

2833

PALMER E. PROFFITT,	X	
Complainant,	X	IN THE CIRCUIT COURT OF
Vs.	X	BALDWIN COUNTY, ALABAMA
PAULINE WILLIAMS PROFFITT,	X	IN EQUITY
Respondent.	X	CASE NO. 2833

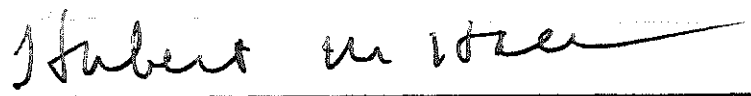
MODIFIED DECREE

This cause coming on to be heard was submitted upon the Petition of the Complainant for a modification of a decree of divorce heretofore granted on the 14th day of August, 1952, decree pro confesso on service by Registered Mail and testimony of the Complainant taken ore tenus, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for.

It is therefore, ORDERED, ADJUDGED and DECREED by the Court that the Decree of Divorce heretofore granted in this cause on the 14th day of August, 1952, be, and the same is, hereby further amended and modified so as to reduce the amount of support and maintenance paid to the Respondent for the support and maintenance of the said minor children from \$37.00 every two weeks to \$25.00 every two weeks.

It is further ORDERED that Palmer E. Proffitt, the Complainant, pay the cost herein to be taxed, for which execution may issue.

This the 17th day of December, 1962.

  
Hubert M. Hall, Circuit Judge

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Pauline Williams Proffitt to appear and plead, answer or demur within thirty days from the service hereof to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by Palmer E. Proffitt as Complainant, and against Pauline Williams Proffitt, as Respondent.

Witness my hand this 25 day of July, 1962.

Alice L. Duck R.  
Register

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PALMER E. PROFFITT,	X	
Complainant,	X	IN THE CIRCUIT COURT OF
Vs.	X	BALDWIN COUNTY, ALABAMA
PAULINE WILLIAMS PROFFITT,	X	IN EQUITY
Respondent.	X	CASE NO. 2833

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE 28TH JUDICIAL CIRCUIT OF THE STATE OF ALABAMA, SITTING IN EQUITY:

Comes now your Complainant in the above styled cause, Palmer E. Proffitt, and respectfully shows and represents unto Your Honor as follows:

1.

That your Complainant is over the age of twenty-one years and that he is a resident of the State of Alabama and has been for the past ten years next preceeding the filing of this Petition; that the Respondent, Pauline Williams Proffitt, is over the age of twenty-one years and that she is a resident of 211 West Pine Street, Johnson City, Tennessee.

2.

That your Complainant and the Respondent were permanently divorced from the bonds of matrimony by a decree granted by this Honorable Court on the 14th day of August, 1952; that the said decree awarded the care, custody and control of the minor children Beryl Proffitt, Linda Proffitt and Sharon Proffitt to the Respondent; that said decree further ordered your Complainant to pay to

the Respondent Fifty-five Dollars (\$55.00) every two weeks for the support and maintenance of said minor children.

3.

That on the 23rd day of May, 1956, Your Honor entered a decree modifying the previous decree granted on the 14th day of August, 1952, by reducing the amount of support and maintenance for the minor children to Thirty-seven Dollars (\$37.00) every two weeks. This decree was the result of a Petition filed by Your Complainant alleging that one of the minor children, Beryl Proffitt, had married and was no longer living with the Respondent.

4.

That since the granting of the decree of modification of support and maintenance, Linda Proffitt, one of the said minor children, has reached her majority and is now residing with your Complainant and has been for the past two years.

WHEREFORE, Premises considered, your Complainant prays that Your Honor will, by proper process, make the said Pauline Williams Proffitt party Respondent to this Petition of Modification, requiring her to plead, answer or demur to the same within the time and under the penalty prescribed by law and the practice of this Honorable Court.

Your Petitioner further prays that Your Honor will enter an order modifying the decree entered by this Honorable Court on the 14th day of August, 1952, and the decree modifying support and maintenance by this Court on the 23rd day of May, 1956, by reducing the amount of support and maintenance required to be paid by your Petitioner to the Respondent; Your Petitioner prays for such other, further or general relief as he may be in equity entitled.

WILTERS & BRANTLEY

BY: 

Attorney for the Complainant

Defendants Address:

211 W. Pine Street  
Johnson City, Tennessee

FILED  
JUL 25 1956  
CLERK  
REC'D

The first part of the paper is devoted to the study of the asymptotic behavior of the solutions of the system (1.1) as  $t \rightarrow \infty$ . In the second part, we study the asymptotic behavior of the solutions of the system (1.1) as  $t \rightarrow 0$ . In the third part, we study the asymptotic behavior of the solutions of the system (1.1) as  $t \rightarrow \infty$  for the case of a non-constant  $\alpha$ . In the fourth part, we study the asymptotic behavior of the solutions of the system (1.1) as  $t \rightarrow 0$  for the case of a non-constant  $\alpha$ . In the fifth part, we study the asymptotic behavior of the solutions of the system (1.1) as  $t \rightarrow \infty$  for the case of a non-constant  $\alpha$  and a non-constant  $\beta$ . In the sixth part, we study the asymptotic behavior of the solutions of the system (1.1) as  $t \rightarrow 0$  for the case of a non-constant  $\alpha$  and a non-constant  $\beta$ . In the seventh part, we study the asymptotic behavior of the solutions of the system (1.1) as  $t \rightarrow \infty$  for the case of a non-constant  $\alpha$  and a non-constant  $\beta$  and a non-constant  $\gamma$ . In the eighth part, we study the asymptotic behavior of the solutions of the system (1.1) as  $t \rightarrow 0$  for the case of a non-constant  $\alpha$  and a non-constant  $\beta$  and a non-constant  $\gamma$ . In the ninth part, we study the asymptotic behavior of the solutions of the system (1.1) as  $t \rightarrow \infty$  for the case of a non-constant  $\alpha$  and a non-constant  $\beta$  and a non-constant  $\gamma$  and a non-constant  $\delta$ . In the tenth part, we study the asymptotic behavior of the solutions of the system (1.1) as  $t \rightarrow 0$  for the case of a non-constant  $\alpha$  and a non-constant  $\beta$  and a non-constant  $\gamma$  and a non-constant  $\delta$ .

ALICE

FILED  
JUL 25 1962  
ALICE J. DUCK, CLERK  
REGISTER

$$\begin{array}{r} 2833 \\ \hline \end{array}$$
[illegible]
$$\begin{array}{l} \mathcal{D} = \{x \in \mathbb{R}^n : x = \sum_{i=1}^n \alpha_i v_i, \alpha_i \geq 0, \sum_{i=1}^n \alpha_i = 1\} \\ \mathcal{D}^* = \{x \in \mathbb{R}^n : x = \sum_{i=1}^n \beta_i w_i, \beta_i \geq 0, \sum_{i=1}^n \beta_i = 1\} \\ \mathcal{D} \cap \mathcal{D}^* = \{x \in \mathbb{R}^n : x = \sum_{i=1}^n \gamma_i v_i, \gamma_i \geq 0, \sum_{i=1}^n \gamma_i = 1\} \end{array}$$
[illegible]

35

PALMER E. PROFFITT

COMPLAINANT

VS

PAULINE WILLIAMS PROFFITT

RESPONDENT

IN THE CIRCUIT COURT OF

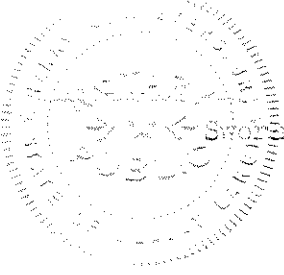
BALDWIN COUNTY, ALABAMA,

IN EQUITY

CASE NO. 2833

## AFFIDAVIT OF NON-RESIDENCE

Personally appeared before me Harry J. Wilters Jr., Notary Public, in and for the State of Alabama, Palmer E. Proffitt, the Complainant in the above styled cause, who being duly sworn, deposes and says that he is informed and verily believes that Pauline Williams Proffitt, Respondent in the above styled cause, is a non-residence of the State of Alabama, and whose residence and Post Office address is 307½ East Watauga Avenue, Johnson City, Tennessee, and that the said respondent is in the belief of the affiant over twenty-one years of age. Further that the last address in which he communicated with the respondent was the same above given.



*Palmer E. Proffitt*

Sworn to and subscribed before me this 22 day of February, 1956.

*Harry J. Wilters Jr.*  
Notary Public,

PALMER E. PROFFITT

COMPLAINANT

VS

PAULINE WILLIAMS PROFFITT

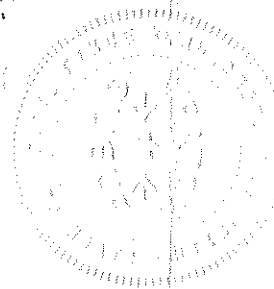
RESPONDENT

AFFIDAVIT OF NON-RESIDENCE

FILED

FEB 24 1956

ALICE J. DUCK, Register



BOOK 021 PAGE 230

PALMER E. PROFFITT  
COMPLAINANT  
VS  
PAULINE WILLIAMS PROFFITT  
RESPONDENT  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

KNOW ALL MEN BY THESE PRESENTS that WHEREAS the Complainant and the Respondent married at Johnson City, Tennessee, in September of 1938, and

WHEREAS the parties have three children: Beryl Proffitt, a girl, now thirteen years of age; Linda Proffitt, a girl, now nine years of age; and Sharon Proffitt, a girl, now five years of age; and

WHEREAS the parties have decided and concluded that it is impossible for them to longer live together as husband and wife; and

WHEREAS in November of 1948, they separated and have since that time lived separate and apart; and

WHEREAS the parties have reached a full and complete agreement as to the custody, maintenance and support of the minor children: Beryl Proffitt, Linda Proffitt, and Sharon Proffitt.

NOW THEREFORE, it is hereby expressly agreed by and between the parties hereto as follows:

1. That the Respondent, Pauline Williams Proffitt, shall have the custody, care, and control of the minor children: Beryl Proffitt, Linda Proffitt, and Sharon Proffitt;
2. That the Complainant will pay \$55.00 every two weeks to the Respondent for the support and maintenance of the children.
3. That the Respondent will allow the Complainant the right to visit the said minor children.

IN WITNESS WHEREOF, the parties hereto have hereunto set their hands and seals, in duplicate, on this the 5 day of AUGUST, 1952.

B E Proffitt (SEAL)

Pauline Williams Proffitt (SEAL)

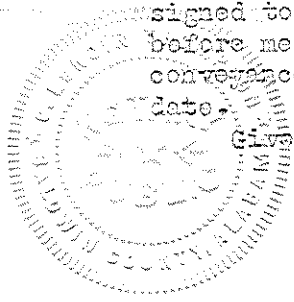
BOOK 021 PAGE 201

STATE OF ALABAMA

BALDWIN COUNTY

I, C. LeNoir Thompson, a Notary Public, in and for said county, in said state, hereby certify that Palmer E. Proffitt, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of said conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 5th day of August, 1952.



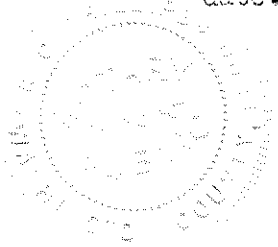
*C. LeNoir Thompson*  
Notary Public, Baldwin County, Ala.

*my Comm. Exp. 8/11/52*

STATE OF *Iowa*  
COUNTY OF *Washington*

I, *R. C. Phelps*, a Notary Public, in and for said county, in said state, hereby certify that Pauline Williams Proffitt, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of said conveyance, she executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the *1* day of *Aug.*, 1952.

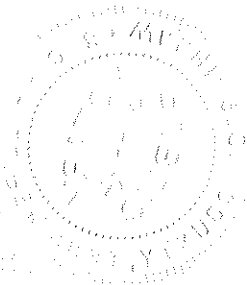


*R. C. Phelps*  
Notary Public





**RECORDED**



Palmer E. Proffitt

COMPLAINANT

VS

PAULINE WILLIAMS PROFFITT

RESPONDENT

AGREEMENT

**FILED**

**AUG 12 1952**

ALICE L. DUCK, Register

8601. Motion For Decree Pro Confesso on Publication.

B.T.-10-46-200

THE STATE OF ALABAMA, }

Baldwin County

CIRCUIT COURT, IN EQUITY

No. \_\_\_\_\_, Term, 19\_\_\_\_

Palmer E. Proffitt

Complainant

Vs.

Pauline Williams Proffitt

Defendant

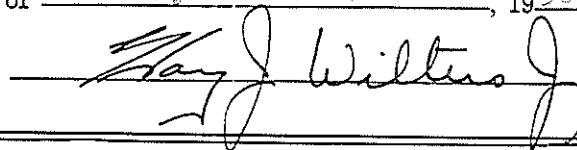
Motion is hereby made for a Decree Pro Confesso against ~~Pauline Williams Proffitt~~

Defendant

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 18 day of May, 1956.

746 Code



Solicitor.

No. \_\_\_\_\_ Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT, IN EQUITY**

Palmer E. Proffitt

Complainant \_\_\_\_\_

**Vs.**

Pauline Williams Proffitt

Defendant \_\_\_\_\_

**Motion for Decree Pro Confesso**  
**On Publication**

Filed May 18, 1956

Archie J. Duck  
Register.

Recorded in \_\_\_\_\_ Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

Decree Pro Confesso of Publication.

MPCO

THE STATE OF ALABAMA, }  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

No. \_\_\_\_\_, Term, 19\_\_\_\_

Palmer E. Proffitt

Complainant

Vs.

Pauline Williams Proffitt

Defendant

In this cause it appears to the Register Alice J. Duck that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 1st day of March, 1956, in the Baldwin Times a newspaper published in Bay Minette, Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the 1st day of March, 1956 and \_\_\_\_\_

And it now further appearing to the Register Alice J. Duck that the said

Pauline Williams Proffitt

having, to the date hereof, failed to demur, plead to, or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant\_\_\_\_\_, ordered and decreed by the Register Alice J. Duck \_\_\_\_\_ that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said Pauline Williams Proffitt

This 19 day of Mar, 1956

Alice J. Duck Register.

No. \_\_\_\_\_ Page \_\_\_\_\_

The State of Alabama,  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

Palmer E. Proffitt

Vs.

Pauline Williams Proffitt

Decree Pro Confesso of Publication

Issued May 19 1956

Register.

Recorded in \_\_\_\_\_ Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

## PETITION FOR MODIFICATION

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons PAULINE WILLIAMS PROFFITT to appear and plead, answer or demur within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by Palmer E. Proffitt as Complainant and against Pauline Williams Proffitt, as Respondent.

WITNESS my hand this the 28 day of Jan, 1956.

*W. J. Duck*  
Register

PALMER E. PROFFITT

COMPLAINANT

VS

PAULINE WILLIAMS PROFFITT

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 2833

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE TWENTY EIGHTH JUDICIAL CIRCUIT OF THE STATE OF ALABAMA, IN EQUITY SITTING;

Comes your Complainant in the above styled cause, Palmer E. Proffitt, and respectfully shows and represents unto Your Honor as follows:

1.

That your Complainant is over the age of twenty-one years and that he is a bona fide resident of Mobile County, Alabama, and has been for more than one year next preceding the filing of this petition; that the Respondent, Pauline Williams Proffitt, is over the age of twenty-one years and she is a resident of Johnson City, Tennessee, and whose address is 307 1/2 East Watauga Avenue, Johnson City, Tennessee.

2.

That your Complainant and the Respondent were permanently divorced from the bonds of matrimony by a decree granted by this Honorable Court, on the 14th day of August, 1952; that said decree awarded the care, custody and control of the minor children, Beryl Proffitt, Linda Proffitt and Sharon Proffitt, to the Respondent; that said decree further ordered your Complainant to pay to the Respondent \$57.00 every two weeks for the support and maintenance of said minor children.

That since this decree was granted, Beryl Proffitt, one of the said minor children, has married and is no longer living with her mother, the Respondent. Further that the said Beryl Proffitt was married on October 12, 1955, and is now residing in the State of Alabama.

WHEREFORE, the premises considered, Your Complainant prays that your Honor will by proper process make the said Pauline Williams Proffitt party respondent to this petition of modification requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Petitioner further prays that Your Honor will enter an order modifying the decree entered by this Honorable Court on the 11th day of August, 1952, by reducing the amount of support and maintenance required to be paid by your petitioner to the Respondent; your petitioner prays for such further or general relief as he may in equity be entitled.

Winters & Brantley

BY: 

Solicitors for the Complainant

2833

PALMER E. PROFFITT

COMPLAINANT

VS

PHULINE WILLIAMS PROFFITT

RESPONDENT

PETITION FOR MODIFICATION

FILED

JAN 28 1956

ALICE L. DUCK, *Register*



PALMER E. PROFFITT

COMPLAINANT

VS

PAULINE WILLIAMS PROFFITT

RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 2833

MODIFIED DECREE

This cause coming on to be heard was submitted upon the Petition of the Complainant for a modification of a decree of divorce heretofore granted on the 11th day of August, 1952, decree pro confesso on service by publication, and testimony as noted by the Register and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED, by the Court, that the decree of divorce heretofore granted in this cause, on the 11th day of August, 1952, be and the same is hereby amended and modified so as to reduce the amount of Support and maintenance paid to the Respondent for the Support and maintenance of the said minor children from \$55.00 every two weeks to \$ 37<sup>00</sup> every two weeks.

IT IS FURTHER ORDERED that Palmer E. Proffitt, the Complainant, pay the cost herein to be taxed, for which execution may issue.

This 23 day of May, 1956.

Hubert M. Hall  
JUDGE, CIRCUIT COURT, IN EQUITY

RECORDED

PALMER E. PROFFITT

COMPLAINANT

VS

PAULINE WILLIAMS PROFFITT

DEFENDANT

MODIFIED DECREE

Filed 6-23-56  
Clerk of Court  
Register

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons PAULINE WILLIAMS PROFFITT to appear and plead, answer or demur within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by PALMER E. PROFFITT as Complainant and against PAULINE WILLIAMS PROFFITT, as Respondent.

WITNESS my hand this the 8<sup>th</sup> day of July, 1952.

*Alice French*  
Register

PALMER E. PROFFITT	§	
	§	IN THE CIRCUIT COURT OF
COMPLAINANT	§	BALDWIN COUNTY, ALABAMA,
VS	§	IN EQUITY
PAULINE WILLIAMS PROFFITT	§	
RESPONDENT	§	

TO HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT  
OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Your Complainant, Palmer E. Proffitt, respectfully represents  
unto Your Honor and this Honorable Court as follows:

1.

That your Complainant, Palmer E. Proffitt, is over twenty-one years of age; a bona fide resident of Mobile, Alabama, and has been for more than two years next preceding the filing of this bill of complaint; that the Respondent, Pauline Williams Proffitt, is over twenty-one years of age and a non-resident of the State of Alabama, her address being: 818 Polk Avenue, Johnson City, Tennessee.

2.

That your Complainant and the Respondent were married at Johnson City, Tennessee, in September of 1938, and lived together as husband and wife until November of 1948.

3.

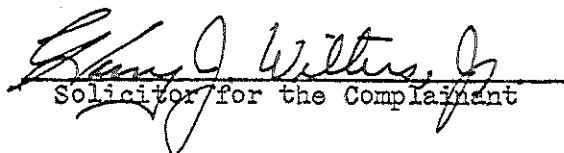
That on to-wit, November of 1948, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that date.

4.

That there was born to the marriage between your Complainant and the Respondent three children: Beryl Proffitt, a girl, now 13 years of age; Linda Proffitt, a girl, now 9 years of age; Sharon Proffitt, a girl, now 5 years of age; that they are now and have been all of their lives living with the Respondent.

WHEREOF, the premises considered, your Complainant prays that your Honor will by proper process make the said Pauline Williams Proffitt party respondent to this bill of complaint requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a final Hearing hereof, Your Honor will enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent. Your Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive.

  
Solicitor for the Complainant

no 2833

RECORDED

FILED

JUL 8 1952

ALICE J. DUCK, Register

Palmer E. Proffitt

vs.

Pauline Williams Proffitt

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, \_\_\_\_\_

answer and waiver of respondent and testimony of Palmer E. Proffitt  
and Neal A. McDonald

and in behalf of Defendant upon \_\_\_\_\_

*Tom J. Wilkins Jr.*

*Archie J. Jones*

Register.

No. ....

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
**Circuit Court of Baldwin County**

Palmer E. Proffitt

vs.

Pauline Williams Proffitt

**NOTE OF TESTIMONY**

Filed in Open Court this .....

day of ....., 194.....

Register

Printed By The Baldwin Times

**THE STATE OF ALABAMA**  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

Palmer E. Proffitt

Complainant

VS.

Pauline Williams Proffitt

Respondent

I, Joan Wilters

as ~~Register and~~ Commissioner

have called and caused to come before me Palmer E. Proffitt and Neal A. McDonald

witness es named in the Requirement for Oral Examination, on the 8th day of August  
1945, at the office of Harry J. Wilters Jr.

in Bay Minette, Alabama, and having first sworn said Witness es to speak the  
truth, the whole truth, and nothing but the truth, the said Palmer E. Proffitt and Neal A.  
McDonald doth depose and say as follows:

My name is Palmer E. Proffitt. I am over twenty-one years of age and a resident of the State of Alabama, and have been for more than two years next preceding the filing of the bill of complaint in this cause. The Respondent, Pauline Williams Proffitt, is over twenty-one years of age, and a non-resident of the state of Alabama, she is a resident of the State of Tennessee in Johnson City. Her address being 818 Polk Avenue.

The Respondent and I were married in Johnson City, Tennessee, in September, 1936, and we lived together as husband and wife until November of 1946.

The Respondent voluntarily abandoned my bed and board and she has remained away voluntarily and continuously since that time.

The Respondent and I have three children: Beryl Proffitt, age thirteen; Linda Proffitt, age nine; and Sharon Proffitt, age five. I agree to pay \$55.00 every two weeks for the support and maintenance of the children.

B E Proffitt



ORAL EXAMINATION.

I, \_\_\_\_\_, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness \_\_\_\_\_ and read over to \_\_\_\_\_ and \_\_\_\_\_ signed the same in the presence of myself \_\_\_\_\_

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness \_\_\_\_\_ or had proom made before me of the identity of said witness \_\_\_\_\_; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this \_\_\_\_\_ day of \_\_\_\_\_, 194\_\_\_\_\_

\_\_\_\_\_  
(L. S.)

NO. \_\_\_\_\_ PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY  
IN CIRCUIT COURT, IN EQUITY.

vs. Complainant

Respondent.

Oral Deposition

Filed \_\_\_\_\_, 194\_\_\_\_\_

Register.

Recorded in

Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

**THE STATE OF ALABAMA**  
Baldwin County.Circuit Court of Baldwin County, Alabama  
(In Equity)

Complainant

VS.

Respondent

I, \_\_\_\_\_

as Register and Commissioner \_\_\_\_\_

have called and caused to come before me \_\_\_\_\_

witness \_\_\_\_\_ named in the Requirement for Oral Examination, on the \_\_\_\_\_ day of \_\_\_\_\_  
194\_\_\_\_, at the office of \_\_\_\_\_  
in \_\_\_\_\_, Alabama, and having first sworn said Witness \_\_\_\_\_ to speak the  
truth, the whole truth, and nothing but the truth, the said \_\_\_\_\_  
\_\_\_\_\_ doth depose and say as follows:

Neal A. McDonald, a witness for the Complainant being first duly sworn,  
deposes and says:

The Complainant in the above styled cause has been my friend for the  
past two years preceding the filing of this complaint and we have worked  
together within the same building for said period. I know that he and the  
Respondent, Pauline Williams Proffitt, have not lived together as husband  
and wife for more than two years prior to the filing of the bill of com-  
plaint in this cause.



ORAL EXAMINATION.

I, Joan Wilters, as ~~Register~~ and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness es and read over to them and they signed the same in the presence of myself and Harry J. Wilters Jr. at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom made before me of the identity of said witness es; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 8th day of August, 1945

Joan Wilters (L. S.)

NO. \_\_\_\_\_ PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Palmer E. Proffitt

vs. Complainant

Pauline M. Proffitt

Respondent.

## Oral Deposition

Filed 8-17, 1945

Lucifore, Register.  
Recorded in \_\_\_\_\_

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

# NOTICE TO NON-RESIDENT

The Baldwin Times, Bay Minette, Alabama

Palmer E. Proffitt		The State of Alabama,
Complainant		
No.		Baldwin County.
vs.		
Pauline Williams Proffitt		Circuit Court, in Equity
Respondent		This the 24 <sup>th</sup> day of
		February, 1945

In this cause it being made to appear to the Clerk of this Court by the affidavit of  
 Palmer E. Proffitt  
 that the ~~Defendant~~ Respondent, Pauline Williams Proffitt

is a non-resident of the State of Alabama her last known address being 307 1/2 East  
 Watauga Avenue, Johnson City, Tennessee,

Respondent  
 and further, that, in the belief of said Affiant the ~~Defendant~~ is over the age of 21  
 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper pub-  
 lished in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring  
 Pauline Williams Proffitt the said Respondent

to answer or demur to the Bill of Complaint in this cause by the 31st day of  
 March 1945 or after thirty days therefrom a decree Pro Confesso may be  
 taken against her

Walters & Brantley

By: Solicitors for the Complainant

*Allice J. Luck*  
 Register.

THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO: Evelyn Watts

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine Palmer E. Proffitt and Margaret T. Proffitt

a witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

Palmer E. Proffitt

is \_\_\_\_\_, Complainant  
and Pauline Williams Proffitt

\_\_\_\_\_ Respondent  
on oath, to be by you administered, upon \_\_\_\_\_ witnesses  
to take and certify the deposition \_\_\_\_\_ of the witness \_\_\_\_\_ and return the same to our Court, with all convenient speed, under your hand.

Witness 19 day of May, 195 5

Burice J. Black  
Register.

Commissioner's Fee, \$ \_\_\_\_\_

Witness' Fees, \$ \_\_\_\_\_

No. \_\_\_\_\_

**THE STATE OF ALABAMA**  
**Baldwin County**

**CIRCUIT COURT**

Palmer E. Proffitt

Complainant

VS.

Pauline Williams Proffitt

Defendant

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER:

Evelyn Watts

WITNESSES:

Palmer E. Proffitt

Margaret T. Proffitt

Witness, Pauline Williams Proffitt

Commissioner, Evelyn Watts

Witness, Palmer E. Proffitt

Witness, Margaret T. Proffitt

Witness, Evelyn Watts

Witness, Pauline Williams Proffitt

Witness, Palmer E. Proffitt

Witness, Margaret T. Proffitt

Witness, Evelyn Watts

Witness, Pauline Williams Proffitt

Witness, Palmer E. Proffitt

Witness, Margaret T. Proffitt

Witness, Evelyn Watts

Witness, Pauline Williams Proffitt

The State of Alabama, Baldwin County

Circuit Court, In Equity

Palmer E. Proffitt, Complainant  
vs.

Pauline Williams Proffitt, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on Answer and waiver and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and that the said Palmer E. Proffitt is forever divorced from the said Pauline Williams Proffitt for and on account of Voluntary Abandonment. IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court that the Respondent be and she is hereby awarded the care, custody and control of the minor children, Beryl Proffitt, Linda Proffitt and Sharon Proffitt, WITH the right of the Complainant to visit them.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court, that the Complainant will pay to the Respondent \$55.00 every two weeks for the support and maintenance of said minor children.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Palmer E. Proffitt the Complainant pay the cost herein to be taxed, for which execution may issue.

This 14<sup>th</sup> day of August, 1952.

*Isaiah J. Marshall*  
Judge Circuit Court, In Equity.

I, \_\_\_\_\_ Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

Register of Circuit Court, In Equity.

No. \_\_\_\_\_ Page \_\_\_\_\_

The State of Alabama  
BALDWIN COUNTY

In Circuit Court, In Equity

Palmer E. Proffitt

Complainant

vs.

Pauline Williams Proffitt

Respondent

**DIVORCE DECREE**

**FILED**

**AUG 14 1952**

**ALICE J. DUCK, Register**



COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT

TO: Joan Wilters

KNOW YE: that we, having full faith in your prudence and competency, have appointed you  
Commissioner, and by these presents do authorize you, at such time and place as you may appoint,  
to call before you and examine Palmer E. Proffitt and Neal A. McDonald

as witnesses in behalf of Complainant in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein Palmer E. Proffitt

Pauline Williams Proffitt, Complainant  
and Pauline Williams Proffitt

Respondent  
on oath, to be by you administered, upon Palmer E. Proffitt and Neal A. McDonald  
to take and certify the deposition of the witness and return the same to our Court, with all  
convenient speed, under your hand.

Witness 8th day of Aug, 1952

Alfred J. Venable  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. \_\_\_\_\_

**THE STATE OF ALABAMA**  
**Baldwin County**

**CIRCUIT COURT**

Palmer E. Proffitt

Complainant—

**vs.**

Pauline Williams Proffitt

Defendant—

**COMMISSION TO TAKE DEPOSITION**

**COMMISSIONER**

Joan Wilfers

**WITNESSES:**

Palmer E. Proffitt

Neal A. McDonald

Palmer E. Proffitt

vs.

Pauline Williams Proffitt

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, \_\_\_\_\_

decree pro confesso on publication, testimony of Palmer E. Proffitt and \_\_\_\_\_

Margaret T. Proffitt

and in behalf of Defendant upon \_\_\_\_\_

Walter & Brantly  
by Mary J. Walter

\_\_\_\_\_  
Register.

No. ....

**THE STATE OF ALABAMA**

**Baldwin County**

**IN EQUITY**

**Circuit Court of Baldwin County**

Palmer E. Proffitt

vs.

Pauline W. Proffitt

**NOTE OF TESTIMONY**

Filed in Open Court this 19

day of May, 1956

Register.

The State of Alabama, {  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

Palmer E. Proffitt Complainant

VS.

Pauline Williams Proffitt Respondent

I, Evelyn Watts

as Register and Commissioner

have called and caused to come before me Palmer E. Proffitt and Margaret T. Proffitt

witnesses named in the Requirement for Oral Examination, on the 19 day of May

1956, at the office of Wilters & Brantley

in Bay Minette, Alabama, and having first sworn said Witnesses to speak the truth, the whole truth, and nothing but the truth, the said witnesses

doth depose and say as follows:

My name is Palmer E. Proffitt. I am the Complainant in this cause and over the age of twenty-one years. I have been a resident of Mobile, Alabama, for seven years. The Respondent, Pauline Proffitt is over twenty-one years, and the last that I knew of her she was a resident of Johnson City, Tennessee. The last address which I received mail from her was 307 1/2 E. Watauga Avenue, Johnson City, Tennessee. This is also the address which I generally send her checks for support and maintenance for my children. I and the Respondent were permanently divorced by a decree granted by this Honorable Court on the 11th day of August, 1952. The decree awarded the care, custody and control of the minor children, Beryl Proffitt, Linda Proffitt and Sharon Proffitt to the Respondent; that said decree further ordered me to pay the Respondent \$55.00 every two weeks for the support and maintenance of my children. That since the decree was granted Beryl Proffitt, one of my children, has married, and is no longer with her mother. Beryl married on the 12 day of November, 1955, and is now residing in Mobile, Alabama.

I am desirous of having the decree of this court modified by reducing the amount of maintenance and support payable to Pauline Proffitt for my three minor children proportionately, that is, I would like to have it reduced one-third, because she is no longer caring for Beryl.

*Palmer E. Proffitt*

My name is Margaret Proffitt. I am now the wife of Palmer E. Proffitt. I know his daughter Beryl Proffitt Perry. I know that she was married on the 12th day of November, 1955. I know that she and her husband moved to Mobile around the last part of November, 1955, and have resided there since that time.

*Margaret L. Proffitt*

\$18.00

ORAL EXAMINATION

I, Evelyn Watts, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness es and read over to them and they signed the same in the presence of myself and Harry J. Wilters Jr.

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom made before me of the identity of said witness es; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 19th day of May, 1956

Evelyn Watts (L. S.)

No. _____	Page _____
The State of Alabama	
Baldwin County.	
In Circuit Court, In Equity	
Palmer E. Profitte	
vs.	Complainant
Pauline Williams Profitte	
	Respondent
Oral Deposition	
Filed <u>FILED</u>	Register
MAY 23 1956	Recorded in
MAY 23 1956	Record
Vol. _____	Page _____
	Register

JIMMY FAULKNER  
PUBLISHER

# THE BALDWIN TIMES

## BALDWIN COUNTY

Alabama's Best County's Best Newspaper

BAY MINETTE, ALABAMA

The State of Alabama, Baldwin County, In Circuit Court, in Equity.

This the 24th day of February, 1956.

Palmer E. Proffitt, Complainant vs. Pauline Williams Proffitt, Respondent.

In this cause it being made to appear to the Clerk of this Court by the affidavit of Palmer E. Proffitt that the Respondent, Pauline Williams Proffitt is a non-resident of the State of Alabama her last known address being 307 1/2 East Watauga Avenue, Johnson City, Tennessee, and further, that, in the belief of said Affiant the Respondent is over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette Baldwin County, Alabama, once a week for four consecutive weeks requiring Pauline Williams Proffitt the said Respondent to answer or demur to the Bill of Complaint in this cause by the 31st day of March, 1956, or after thirty days therefrom a decree Pro Confesso may be taken against her.

ALICE J. DUCK

Register.

Wilters & Brantley,  
Solicitors for the Complainant.

7-4tc

### AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,  
BALDWIN COUNTY.

E. R. Morrisette, Jr. being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Palmer E. Proffitt.

#### COST STATEMENT

195 WORDS @ 6 1/2 cents — — — \$ 12 67

I hereby certify this it correct, due and unpaid (paid).

E. R. Morrisette Jr.  
Editor-Publisher.

was published in said newspaper for 4 consecutive weeks in the following issues:

Date of 1st publication March 1, 1956 Vol. 67 No. 7

Date of 2nd publication March 8, 1956 Vol. 67 No. 8

Date of 3rd publication March 15, 1956 Vol. 67 No. 9

Date of 4th publication March 22, 1956 Vol. 67 No. 10

Subscribed and sworn before the undersigned this 26 day of Mar, 1956

Dorothy Martin  
Notary Public, Baldwin County.

E. R. Morrisette Jr.  
Editor-Publisher.

PETITION FOR MODIFICATION

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons PAULINE WILLIAMS PROFFITT to appear and plead, answer or demur within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by Palmer E. Proffitt as Complainant and against Pauline Williams Proffitt, as Respondent.

WITNESS my hand this the 28 day of Jan, 1956.

W. J. Lusk  
Register

PALMER E. PROFFITT

COMPLAINANT

VS

PAULINE WILLIAMS PROFFITT

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 2833

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE TWENTY EIGHTH JUDICIAL CIRCUIT OF THE STATE OF ALABAMA, IN EQUITY SITTING:

Comes your Complainant in the above styled cause, Palmer E. Proffitt, and respectfully shows and represents unto Your Honor as follows:

1.

That your Complainant is over the age of twenty-one years and that he is a bona fide resident of Mobile County, Alabama, and has been for more than one year next preceding the filing of this petition; that the Respondent, Pauline Williams Proffitt, is over the age of twenty-one years and she is a resident of Johnson City, Tennessee, and whose address is 307½ East Watauga Avenue, Johnson City, Tennessee.

2.

That your Complainant and the Respondent were permanently divorced from the bonds of matrimony by a decree granted by this Honorable Court, on the 14th day of August, 1952; that said decree awarded the care, custody and control of the minor children, Beryl Proffitt, Linda Proffitt and Sharon Proffitt, to the Respondent; that said decree further ordered your Complainant to pay to the Respondent \$55.00 every two weeks for the support and maintenance of said minor children.



3.

That since this decree was granted Beryl Proffitt, one of the said minor children, has married and is no longer living with her mother, the Respondent. Further that the said Beryl Proffitt was married on October 12, 1955, and is now residing in the State of Alabama.

WHEREFORE, the premises considered, Your Complainant prays that your Honor will by proper process make the said Pauline Williams Proffitt party respondent to this petition of modification requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Petitioner further prays that Your Honor will enter an order modifying the decree entered by this Honorable Court on the 11th day of August, 1952, by reducing the amount of support and maintenance required to be paid by your petitioner to the Respondent; your petitioner prays for such further or general relief as he may in equity be entitled.

Wilters & Brantley

BY:

Ray J. Wilters  
Solicitors for the Complainant

BY: *[Signature]*  
Writers & Bramley

*[Stamp: 30-1-1956]*  
30-1-1956

such further or general relief as he may in equity be entitled.

to be paid by the petitioner to the respondent; Your petitioner prays for  
August 1955, by reducing the amount of support and maintenance required  
modifying the decree entered by this Honorable Court on the 11th day of  
Your petitioner further prays that Your Honor will enter an order  
law and the practice of this Honorable Court.

as given to the same within the time and under the penalties prescribed by  
respondent to this petition of modification requiring her to obey, answer

Honor will be proper process with the said Justice William Proffitt both

WHEREFORE, the premises considered, Your Complainant prays that Your  
is now residing in the State of Arizona.

Further that the said Betty Proffitt was married on October 15, 1955, and  
children, was married and is no longer living with her mother, the respondent.

That since this decree was granted Betty Proffitt, one of the said minor

PALMER E. PROFFITT

COMPLAINANT,

VS

PAULINE WILLIAMS PROFFITT

RESPONDENT.

I

I

I

I

I

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Comes now the Respondent, Pauline Williams Proffitt, and  
for answer to the Bill of Complaint heretofore filed against  
her in said cause says as follows:

1. That she denies each and every allegation of the said  
Bill of Complaint and demands strict proof thereof.

And for further answer to said Bill of Complaint, the  
Respondent hereby accepts service of a copy and notice of the  
filing of the said Complaint and hereby waives any further  
notice to her of the day set for hearing, taking of testimony  
or the submission for final decree of the above styled cause  
and does here consent that the same may be submitted and  
testimony taken without further notice to her.

*Pauline Williams Proffitt*  
Pauline Williams Proffitt

Sworn to and subscribed before  
me this 6 day of Aug, 1952.

*[Signature]*  
Notary Public

PAULINE M. PROFFITT

COMPLAINANT

VS

PAULINE M. PROFFITT

DEFENDANT

IN EQUITY

BRIDGES COUNTY, VIRGINIA

IN EQUITY

Complaint

Complaint

for answer to the Bill of Complaint heretofore filed against

her in said cause as follows:

PAULINE M. PROFFITT

PAULINE M. PROFFITT

PAULINE M. PROFFITT

PAULINE M. PROFFITT

PAULINE M. PROFFITT

PAULINE M. PROFFITT

PAULINE M. PROFFITT

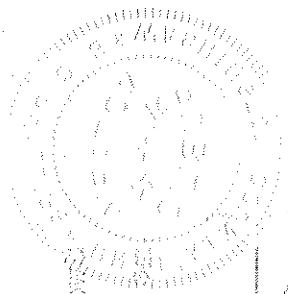
PAULINE M. PROFFITT

PAULINE M. PROFFITT

PAULINE M. PROFFITT

testimony taken without further notice to her.

PAULINE M. PROFFITT



PAULINE M. PROFFITT

PAULINE M. PROFFITT

PAULINE M. PROFFITT

FILED  
AUG 12 1952  
ALICE J. DUCK, Register

RECORDED

#1-INSTRUCTIONS TO DELIVERING EMPLOYEE



Deliver *ONLY* to addressee



Show address where delivered

(Additional charges required for these services)

RETURN RECEIPT

Received the numbered article described on other side.

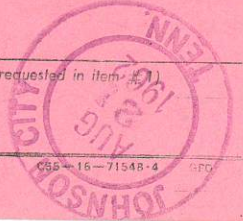
SIGNATURE OR NAME OF ADDRESSEE (must always be filled in)

*X Pauline W Proffitt*

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

DATE DELIVERED

ADDRESS WHERE DELIVERED (only if requested in item #1)



CS-16-71548-4

POST OFFICE DEPARTMENT  
OFFICIAL BUSINESS

2833

PENALTY FOR PRIVATE USE TO AVOID  
PAYMENT OF POSTAGE, \$300

POSTMARK OF  
DELIVERING OFFICE



INSTRUCTIONS: Fill in items below and complete #1 on other side, when applicable. Moisten gummed ends and attach to back of article. Print on front of article RETURN RECEIPT REQUESTED.

RETURN

TO

REGISTER

REGISTERED NO.

NAME OF SENDER

Alice J. Duck, Register

CERTIFIED NO.

STREET AND NO. OR P. O. BOX

931037

P.O. Box 239

INSURED NO.

CITY, ZONE AND STATE

Bay Minette, Alabama

POD Form 3811 Jan. 1958

C55-16-21546-4

2833

## RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

1

*Pauline [illegible]*

(Signature or name of addressee)

2

(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery

*7-17*

19

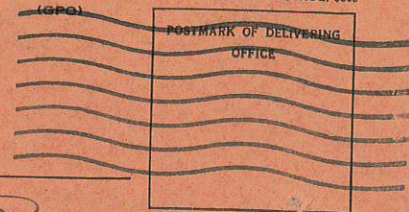
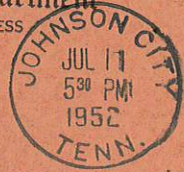
*52*

FILE 1. DM. Register  
JULY 14 1952  
FILED



Post Office Department  
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300



Return to Alice J. Winkler, Registrar  
(NAME OF SENDER)

Street and Number, }  
or Post Office Box, } Box 239

REGISTERED ARTICLE

No. 14

Post Office Bay Minette,

INSURED PARCEL

No. \_\_\_\_\_

16-12421

State Ala.



RECEIPT FOR REGISTERED ARTICLE No.

Fee paid 40 1-28-56 (Date) 19

Class postage paid 1.25 Return receipt fee 7  
Declared value, \$ 2.00 Special delivery fee 20

Surcharge paid, \$ \_\_\_\_\_ Restricted delivery (Accepting employee will place initials in proper space) ☒ in person 20  
☐ or order \_\_\_\_\_  
Fee paid \_\_\_\_\_

From Allice J. Smith (Sender)

13.20 (Post office and State)

Addressed to Pauline Wilcox Pruitt Johnson City (Addressee)  
307 1/2 East Watanga Ave. (Street and number)



Postmaster, per jm

ALICE J. DUCK, Circuit Clerk

*Baldwin County*

BAY MINETTE, ALA.



REASON CHECKED  
Returned to Writer  
Unclaimed.....Refused  
For better address.....  
Moved, Left no address.....  
No such office in state.....

Second Notice. No Reply  
To First Notice Mailed

*Notice left  
11/31/56  
AKS*

Pauline Williams Praffit,  
307½ East Watauga Avenue,  
Johnson City, Tennessee

REGISTERED  
NO. 254

Registered

For Delivery Only To Person  
To Whom Addressed

Return Receipt Requested

RETURN RECEIPT REQUESTED

Deliver to Addressee Only



