SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2140

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Paul W. Mallory

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Paul W. Mallory, Defendant

by _____, Plaintiff

Witness my hand this 14th day of July 1952

Alice J. Peck, Clerk

No. _____ Page _____

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

_____

_____ Plaintiffs

vs.

_____

_____ Defendants

SUMMONS and COMPLAINT

Filed _____, 19 _____

_____, Clerk

_____ Plaintiff's Attorney

_____ Defendant's Attorney

_____

Defendant lives at

_____

RECEIVED IN OFFICE

_____, 19 _____

_____, Sheriff

I have executed this summons

this _____, 19 _____

by leaving a copy with

_____

_____ Sheriff

_____ Deputy Sheriff

FRANCES MALLORY,		
Complainant,		IN THE CIRCUIT COURT OF
-vs-		BALDWIN COUNTY, ALABAMA
PAUL H. MALLORY,		IN EQUITY
, Respondent.		

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:

Your complainant, Frances Mallory, respectfully represents and shows unto your Honor:-

1. That your complainant is over the age of twenty-one years and is a resident of said County and State; that Paul H. Mallory is over the age of twenty-one years and is a resident of Gulf Shores, Baldwin County, Alabama.

2. That your complainant and the respondent were lawfully married on to-wit:- March 9, 1950, and there were no children of this marriage.

3. Complainant further averes and alleges that the Respondent has committed actual violence on her person attended with danger to her life or health.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED: Your Complainant prays that Paul H. Mallory be made a party defendant to this cause by the usual process of this Honorable Court, requiring him to plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the statutes in such cases made and provided; that upon a final hearing of this cause, that your complainant be granted a divorce from said respondent. Should your complainant be mistaken in the relief prayed for that there be granted to her such other, different and general relief to which she may be entitled and as in duty bound she will ever pray.

Solicitor for Complainant

C. G. C.

ORAL DEPOSITION

Printed by the Baldwin Times, Bay Minette, Alabama.

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Frances Mallory Complainant

VS.

Paul H. Mallory Respondent

I, Frances Saffold

as Register and Commissioner in Chancery

have called and caused to come before me Frances Mallory

witness named in the Requirement for Oral Examination, on the 28th day of July 1952, at the office of C.G. Chason

in Foley, Alabama, and having first sworn said Witness to speak the truth, the whole truth, and nothing but the truth, the said Frances Mallory doth depose and say as follows:

My name is Frances Mallory. I am the Frances Mallory who filed a Bill of Complaint for divorce against Paul H. Mallory. On Thursday, July 10, he struck me in the face and committed acts of violence on my persons attended with danger to my life and health, and has on that date and previously threatened me with other and further acts of violence so that I am apprehensive of other and further violence on my person attended with danger to my life or health. He not only has made these threats of doing me other and further harm to me , but several of my friends who have known of his threats have begged me previously to live with him no longer as they were afraid he would kill me or do me serious bodily harm.

Frances Mallory

ORAL EXAMINATION.

I, Frances Saffold, 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 her and she 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 28th day of July, 1952

Frances Saffold (L. S.)

NO. PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Frances Mallory

vs. Complainant

Paul H. Mallory
Respondent.

Oral Deposition

Filed, 194

Register.

Recorded in

Record

Vol. Page

Register.

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2846

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

Paul W. Mallory

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Paul W. Mallory, Defendant

by

Frances Mallory, Plaintiff

Witness my hand this 14th day of July 19 52

Bruce J. Herndon, Clerk

No._____ Page_____

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

_____

_____

Plaintiffs

vs.

_____

_____

Defendants

SUMMONS and COMPLAINT

Filed _____, 19 _____

_____, Clerk

_____

Plaintiff's Attorney

_____

Defendant's Attorney

_____

Defendant lives at

_____

RECEIVED IN OFFICE

_____, 19_____

_____, Sheriff

I have executed this summons

this_____, 19 _____

by leaving a copy with

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____ Sheriff

_____ Deputy Sheriff

FRANCES MALLORY,		
Complainant,		IN THE CIRCUIT COURT OF
-vs-		BALDWIN COUNTY, ALABAMA
PAUL H. MALLORY,		IN EQUITY
, Respondent.		

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:

Your complainant, Frances Mallory, respectfully represents and shows unto your Honor:-

1. That your complainant is over the age of twenty-one years and is a resident of said County and State; that Paul H. Mallory is over the age of twenty-one years and is a resident of Gulf Shores, Baldwin County, Alabama.

2. That your complainant and the respondent were lawfully married on to-wit:- March 9, 1950, and there were no children of this marriage.

3. Complainant further averes and alleges that the Respondent has committed actual violence on her person attended with danger to her life or health.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED: Your Complainant prays that Paul H. Mallory be made a party defendant to this cause by the usual process of this Honorable Court, requiring him to plead, answer or demur within the time and under the penalties prescribed by the rule of this Court and the statutes in such cases made and provided; that upon a final hearing of this cause, that your complainant be granted a divorce from said respondent. Should your complainant be mistaken in the relief prayed for that there be granted to her such other, different and general relief to which she may be entitled and as in duty bound she will ever pray.

Solicitor for Complainant

FILED
Feb 9 1971
Mrs. Ella Mae Lowery
Clerk
BALDWIN COUNTY, ALABAMA
FILED IN CIRCUIT COURT TO
Feb 9 1971
Mrs. Ella Mae Lowery
Clerk
BALDWIN COUNTY, ALABAMA
FILED IN CIRCUIT COURT TO
Feb 9 1971
Mrs. Ella Mae Lowery
Clerk
BALDWIN COUNTY, ALABAMA
FILED IN CIRCUIT COURT TO
Feb 9 1971
Mrs. Ella Mae Lowery
Clerk
BALDWIN COUNTY, ALABAMA

202840

BILL OF COMPLAINT

FRANCES MALLORY,

Complainant,

-vs-

PAUL H. MALLORY,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

Filed: This 14 day of July, 1952.

Register

ORAL DEPOSITION

Printed by the Baldwin Times, Bay Minette, Alabama.

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Frances Mallory Complainant

VS.

Paul H. Mallory Respondent

I, Frances Saffold

as Register and Commissioner in Chancery

have called and caused to come before me Frances Mallory and Mary Harden

witnesses named in the Requirement for Oral Examination, on the 17th day of July 1952, at the office of C. G. Chason in Foley, Alabama, and having first sworn said Witnesses to speak the truth, the whole truth, and nothing but the truth, the said Frances Mallory and Mary Harden doth depose and say as follows:

My name is Frances Mallory and I am over the age of twenty-one years and a resident of Gulf Shores, Baldwin County, Alabama and have been such a resident for over one year. Paul H. Mallory is over the age of twenty-one years and is also a resident of Gulf Shores, Baldwin County, Alabama and has been for over one year. We were married on March 9, 1950 and there are no children of this marriage. We have been having trouble for some time and on many occassions, particularly when under the influence of intoxicating beverages. He gets mean and abusive. The last time was on Thursday, July 10 at which time he struck me in the fact. We have not lived together as man and wife since that time.

Frances Mallory

My name is Mary Harden. I am over the age of twenty-one years and a resident of Gulf Shores, Baldwin County, Alabama. I am personally acquainted with Frances Mallory and Paul H. Mallory who have been residents of Gulf Shores for over a year. For a part of this time Frances Mallory was employed at my place of business. To my knowledge Paul H. Mallory has committed actual violence on the person of Frances Mallory attended with danger to her life or health.

Mary C. Harden

ORAL EXAMINATION.

I, Frances Saffold, 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 each other 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 17th day of July, 1952.

Frances Saffold (L. S.)

NO. 2-6 4 10 PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Frances Mallory
vs. Complainant

Paul H. Mallory
Respondent.

Oral Deposition

Filed 7-18, 1952
Alice J. Rhodes, Register.

Recorded in
Record
Vol. Page
Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Frances Saffold

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 Frances Mallory and Mary Harden

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

, Complainant

and Paul H. Mallory is

Respondent

on oath, to be by you administered, upon

to take and certify the deposition of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 17th day of July, 1952.

Register.

Commissioner's Fee, $

Witness' Fees, $

No. 2845

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Frances Mallory

Complainant—

vs.

Paul H. Mallory

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

Frances Saffold

WITNESSES:

Frances Mallory
Mary Harden

CECIL G. CHASON
ATTORNEY AT LAW
FOLEY, ALABAMA

17 July, 1952

Mrs. Alice J. Duck
Register in Chancery
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith are the necessary papers for closing the Mallory divorce except the decree. I am sending only one decree, this being all I have on hand, and request that you make additional copies so that I may have two copies returned to me. I am also enclosing my check for costs.

There is also enclosed a Bill of Complaint for Lois Merritt. He is a resident of Foley. (or Elberta)

Yours very truly,

Cecil

C. G. Chason

CGC:fs

Enclos. 3

8531. NOTE OF TESTIMONY 1M-7-46 Printed By The Baldwin Times

Frances Mallory

vs.

Paul H. Mallory

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, and testimony of Frances Mallory and Mary Harden.

and in behalf of Defendant upon answer and waiver.

Solicitor for Complainant

Register.

M

No. 2840

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Frances Mallory

vs.

Paul H. Mallory

NOTE OF TESTIMONY

Filed in Open Court this 7-18-52

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

Register.

Printed By The Baldwin Times

FRANCES MALLORY,		
Complainant,		IN THE CIRCUIT COURT OF
-vs-		BALDWIN COUNTY, ALABAMA
PAUL H. MALLORY,		IN EQUITY
Respondent.		

Comes the Respondent in the above-styled cause and accepts service of a Bill of Complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree.

And for answer to the Bill of Complaint heretofore filed in this cause, Respondent says:

1. He admits the allegations containd in paragraph 1 of said Bill of Complaint.

2. He admits the allegations contained in paragraph 2 of said Bill of Complaint.

3. He denies each and every allegation contained in paragraph 3 of said Bill of Complaint and demands strict proof thereof.

Paul H. Mallory
Respondent.

Sworn to and subscribed to before me, a Notary Public on this the 16th day of July, 1952.

Notary Public, Baldwin County
State of Alabama

My Commission Expires September 9, 1953

RECORDED

280

Filed: This the 16th day of July, 1952.

Register