THE STATE OF ALABAMA,

No. 2 140
TERM, 19---

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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| | lead answer or | demur, within | n thirty days from | n the service | hereof, to the | complaint filed in |
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| by Witness my h | nl IV | 14 Th | day of_ | July- | | , Defendant |

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| | Plaintiff's Attorney | | |
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FRANCES MALLORY,

Complainant, I IN THE CI

PACTOR!

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 law-fully 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 of 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.

THE STATE OF ALABAMA Baldwin County.

Circuit Court of Baldwin County, Alabama (In Equity)

| | Frances M | allory | | Complainant | |
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| | Paul H. M | allory | | .Respondent | * |
| I, Frances | Saffold | 4 | | | |
| as Register and Commissioner | in Chancer | 7 | | *** | |
| have called and caused to com | e before me | Frances | | | |
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| witnessnamed in the Rec | | | , on the $\frac{28}{2}$ | it day of | July |
| in Foley | , Alabama, and | d having first | sworn sai | d Witness | to speak the |
| truth, the whole truth, and no | | | | | |
| | doth depose a | nd say as foll | ows: | | - |

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.

| I, Frances Saf | fold | _, as Register ar | nd Commissioner | hereby certify that |
|--|--|--|--|--|
| the foregoing deposition_on | Oral Examination | n was taken do | wn by me in w | riting in the word |
| of the witnessand read | l over to <u>her</u> | _and_she | signed the same | in the presence of |
| myself | | | | |
| at the time and place herein | mentioned; that | I have personal | l knowledge of | personal identity of |
| said witnessor had proom | ı made before me | of the identity o | f said witness | ; that I am not c |
| counsel or of kin to any of the | ne parties to said | cause, or any ma | anner interested | in the result thereo |
| I enclose the said Oral E | xamination in an | envelope to the | Register of said (| Court. |
| Given under my hand and | d seal, this 28t. | day of | July | , 194 <u>5</u> 2 |
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CIRCUIT COURT, BALDWIN COUNTY

No.284()

TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

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| to appear and | plead, answer or demur, | within thirty days | from the service hereof, | to the complaint filed is |
| | ourt of Baldwin County, S | | | |
| | Paul W. | | | , Defendant |
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- averes and alleges that the actual violence on her Complainant ample bondent was committed \$., (b) .51

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BILL OF COMPLAINT

FRANCES MALLORY,

Complainant,

PAUL H. MALLORY,

Respondent.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IN EQUITY.

Filed: This 144day of

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 Commissionerin Chancery | |
| have called and caused to come before meFranc | es Mallorv and |
| Mary Harden | |
| witnesses named in the Requirement for Oral Examination | on the 17thday of July |
| 19\$\overline{\partial} 2 , 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: | ows: |
| | |
| Mr nome is Thomas Mis I I ame | A T 200 2 22 23 2 |

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.

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.

Many a. Harden

Complete Company of the Complete States

| 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 | |
| | have personal knowledge of personal identity of |
| said witness es or had proom made before me of | the identity of said witness_ <u>es</u> ; that I am not of |
| counsel or of l-iv-to | the identity of said witness es; that I am not of |
| | ause, or any manner interested in the result thereof |
| I enclose the said Oral Examination in an er | evelope to the Register of said Court. |
| Given under my hand and seal, this 17th | |
| Company of the Compan | |
| SERVINE CONTRACTOR | Frances Saffeld (L. S.) |
| | (L. S.) |
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| | , Register. | Vol. Page Record | Recorded in | and buch Register | Filed 2-18 104-6 | Oral Deposition | Paul H. Mallory Respondent. | vs. Complainant | Frances Mallory | | IN CIRCUIT COURT, IN EQUITY. | THE STATE OF ALABAMA BALDWIN COUNTY | NO. 2-6 H PAGE |
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THE STATE OF ALABAMA, Baldwin County.

Witness' Fees, \$_

CIRCUIT COURT

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| KNOW | YE: that | we, having | full faith in | your prudence ar | id competency | , have appointed yo |
| Commission | er, and by | these pre | sents do autho | orize you, at such | time and plac | e as you may appoin |
| o call befor | re you and | examine _ | France | es Mallory a | nd Mary F | arden |
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| | | Paul | H. Mallo | ry is | | |
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| | | | | | | Respondent_ |
| on oath, to | be by you | administer | ed, upon | | | |
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| convenient | speed, und | er your na | .aa. | | , | |
| Witness | . 17t | h day of | July | | , _{195_} 2 | |
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| No. 2845 |
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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 Minetee, 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. (a Ellera)

Yours very truly,

CGC:fs

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| No. 2840 | *************************************** | | |
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| THE STATE OF ALAI Baldwin County | ВАМА | | |
| IN EQUITY Circuit Court of Baldwin | County | | |
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| Paul H. Wallory | | | |
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FRANCES MALLORY,

Complainant, 1

IN THE CIRDUIT 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.

Respondent --

Sworn to and subscribed to before me, a Notary Public on

this the

day of Iseles

1952.

Notary Public, Baldwin County State of Alabama

State of Wignama

RECORDED



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

Acres Register