

JUNE ANICE PAUL
Complainant
VS
HERMAN PAUL
Respondent

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
)
) IN EQUITY
) NUMBER: 4243

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TO THE HONORABLE HUBERT M. HALL JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, IN SITTING EQUITY:

Comes now Your Complainant, June Anice Paul, and amends her bill of
complaint to read as follows:

I

That your Complainant is over the age of 21 years and is a bona fide
resident of Baldwin County, Alabama, and that Respondent is over 21 years of
age and is a bona fide resident of Baldwin County, Alabama.

II

That Complainant and Respondent were married in Leakesville, Mississippi
on August 19, 1956 and that they lived together as husband and wife until
to-wit, March 16, 1958 and that they have not lived together as husband and
wife since that date.

III

That one child, Darlene Paul, was born during the marriage on to-wit
March 16, 1957 and that Complainant is a fit and proper person to have custody
of said child and that Respondent is not a fit and proper person to have
custody of said child.

IV

That on to-wit: March 16, 1958, and many times prior thereto, and
since said marriage, the said Respondent committed actual violence to her
person attended with danger to her life or health and that from his conduct
and threats toward her at said time there was and is grave danger that he
would commit further violence.

Now therefore, the premises considered, Complainant prays that this
Honorable Court will cause process to issue to the said Respondent, HERMAN
PAUL requiring him to plead, answer or demur to same within the time allowed
by law.

And Complainant further prays that upon final hearing of this cause Your Honor will grant to her an absolute divorce forever barring the bonds of matrimony existing between Complainant and Respondent giving her custody of the said Darlene Paul, and that Your Honor will grant such other, further, different or general relief to which Complainant may be in equity and good conscience entitled.

Solicitor for Complainant

JUNE ANICE PAUL
Complainant,
VS
HERMAN PAUL
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY
NUMBER: _____

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Comes now Respondent in the above styled cause and accept services a copy of the Complainant's bill of complaint ^{amended} and waives further notice and waives all further notices of taking of testimony and submission, and for answer to the bill and each paragraph thereof, says:

1. Respondent admits to the allegations containing in paragraph 1.
2. Respondent admits to the allegations to paragraph 2.
3. Respondent admits to the allegations to paragraph 3.
4. Respondent denies the allegations containing in paragraph 4 and demands strict proof thereof.

Herman Paul

Sworn to and subscribed before me this the 20th day of March, 1957.

W. H. Hay
Notary Public, Baldwin County, Alabama

JUNE ANICE PAUL

Complainant

VS

HERMAN PAUL

Respondent

IN THE CIRCUIT COURT

IN EQUITY

NUMBER:

~~2182~~
4243

ANSWER and WAIVER

STATE OF ALABAMA

COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HERMAN PAUL to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of June Anice Paul.

Witness my hand, this the 16 day of March, 1958.

Anice Paul
CLERK

JUNE ANICE PAUL

Complainant

VS

HERMAN PAUL

Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NUMBER: _____

.....

TO THE HONORABLE HUBERT M. HALL JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN SITTING EQUITY:

Your Complainant, JUNE ANICE PAUL, respectfully represents and shows unto Your Honor and this Honorable Court as follows:

I

That your Complainant is over the age of 21 years and is a bona fide resident of Baldwin County, Alabama, and that Respondent is over 21 years of age and is a bona fide resident of Baldwin County, Alabama.

II

That Complainant and Respondent were married in Leakesville, Mississippi on August 19, 1956 and that they lived together as husband and wife until to-wit, March 16, 1958 and that they have not lived together as husband and wife since that date.

III

That one child, Darlene Paul, was born during the marriage on to-wit March 16, 1957 and that Complainant is a fit and proper person to have custody of said child and that Respondent is not a fit and proper person to have custody of said child.

IV

That on to-wit: 4th day of August 1957, and many times prior thereto, and since said marriage, the said Respondent committed actual violence to her person by striking her with his hand attended with danger to her life or health and that from his conduct and threats toward her at said time there was and is grave danger that he would commit further violence; that complainant left respondent and sued for divorce in this Honorable Court about September 18, 1957; that after she had filed suit and before a final hearing thereon Respondent, by pleas, intreaties and promises not to abuse and strike her any more, persuaded Complainant to return to him and become reconciled, whereupon the said suit was dismissed; that Complainant and Respondent lived together until March 16, 1958 as husband and wife; that on or about October 31, 1957 Respondent beat Complainant by striking her with his hand about the face and body and on several occasions thereafter; that Respondent has on many occasions since that time threatened to beat her, thereby endangering her life and health, and that on March 16, 1958 Respondent did threaten to beat and abuse Complainant so that her life and health are in danger; that Complainant has not lived with Respondent since that time.

V

That it has been necessary that Complainant employ a Solicitor to prosecute this, her cause, that she has so employed Wilson Hayes, a Solicitor to so prosecute her cause, that she is unable to pay her Solicitor's fee.

Now therefore, the premises considered, Complainant prays that this Honorable Court will cause process to issue to the said Respondent, HERMAN PAUL requiring him to plead, answer or demur to same within the time allowed by law.

And Complainant further prays that upon final hearing of this cause Your Honor will grant to her an absolute divorce forever barring the bonds of matrimony existing between Complainant and Respondent giving her custody of the said Darlene Paul allowing her alimony and a reasonable Solicitor's fee, and that Your Honor will grant such other, further, different or general relief to which Complainant may be in equity and good conscience entitled.


Solicitor for Complainant

Received 18 day of Mar. 1958
and on 20 day of Mar. 1958
I served a copy of the within of
Herman Paul
service on _____

TAYLOR WILKINS, Sheriff
By W. A. Talbert D. S.
omi

NO. 4743
June Anice Paul
vs.
Herman Paul

4743

FILED
MAR 18 1958
ALICE J. DUCK, Register