

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons ANTHONY J. KLUMPP Sr., 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 MINERVA M. KLUMPP, as Complainant and against ANTHONY J. KLUMPP Sr., as Respondent.

WITNESS MY HAND THIS THE 11 day of March, 1958.

Alice J. Duck  
Register

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MINERVA M. KLUMPP	*	IN THE CIRCUIT COURT OF
	*	
COMPLAINANT	*	BALDWIN COUNTY, ALABAMA.
	*	
VS	*	IN EQUITY.
	*	
ANTHONY J. KLUMPP Sr.	*	CASE NO. _____
	*	
RESPONDENT	*	

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

Your Complainant, MINERVA M. KLUMPP, respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 21 and a resident of Baldwin County, Alabama and has been more than two years next preceding; The Respondent is over the age of 21 and a resident of Baldwin County, Alabama and has been more than two years next preceding.

2.

That your Complainant and the Respondent married in Bay Minette, Alabama, on May 16, 1918, and lived together as husband and wife in Baldwin County, Alabama until on to-wit, November 26, 1949.

3.

That on to-wit November 26, 1949, while your Complainant and Respondent were living together as husband and wife in Baldwin County, Alabama, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

4.

There were born as fruits of this marriage between the

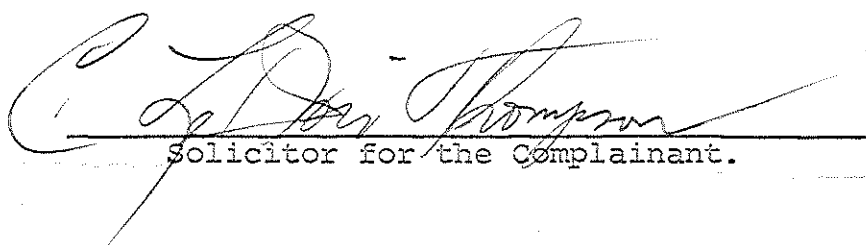
Complainant and the Respondent two children, both having reached maturity.

5.

That in contemplation of litigation in the matter of a divorce the parties hereto through their attorneys have entered into an agreement for a property settlement which agreement has been executed by the Complainant and the Respondent and has been executed by the attorneys for the said Complainant and Respondent and is attached hereto and made a part of this complaint.

WHEREFORE, the premises considered, your Complainant prays that your H<sup>O</sup>nor will by proper procedure make the said Anthony J. Klumpp Sr., party Respondent to this bill of complaint requiring him 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 hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; And that a decree be made setting over to your Complainant herein those properties and monies agreed to by the Respondent herein as noted on the attached agreement to be delivered or paid for in accordance with the terms and provisions of said attached agreement; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

  
Solicitor for the Complainant.

4263

MINERVA M. KLUMPP

COMPLAINANT

VS

ANTHONY J. KLUMPP Sr.

RESPONDENT

\* \* \* \* \*

SUMMONS AND COMPLAINT

\* \* \* \* \*

FILED

APR 11 1958

ALICE J. DUCK, Register

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

MINERVA M. KLUMPP

Complainant

VS.

ANTHONY J. KLUMPP Sr.,

Respondent

I, Lois Wilson

as Register and Commissioner

have called and caused to come before me Minerva M. Klumpp and Nadine McMillan Klumpp

witnesses named in the Requirement for Oral Examination, on the 11th day of April 1958, at the office of C. LeNoir Thompson in Bay Minette, Alabama, and having first sworn said Witnesses to speak the truth, the whole truth, and nothing but the truth, the said Minerva M. Klumpp and Nadine McMillan Klumpp doth depose and say as follows:

That my name is Minerva M. Klumpp, I am the Complainant in this cause. Anthony J. Klumpp Sr., is the Respondent. We are both over the age of 21 and have resided in Baldwin County, Alabama more than two years next preceding. We were married in Bay Minette on May 16, 1918 and lived together as husband and wife in Baldwin County, Alabama until on or about November 26, 1949. On or about November 26, 1949 the Respondent voluntarily abandoned my bed and board and has remained away voluntarily and continuously without fault on my part since that time. There were born as fruits of our marriage two children both of whom are now grown. In contemplation of litigation in the matter of a divorce I have entered into an agreement for a property settlement between the Respondent and me which agreement has also been executed by both of our attorneys. I know we will never live together again as husband and wife and I respectfully ask the court to grant a divorce and to incorporate the terms of the property settlement in the divorce decree.

Minerva M. Klumpp

That my name is Nadine McMillan Klumpp, I know both parties to this cause. They are both over the age of 21 and have resided in Baldwin County more than two years next preceding. They were married in Bay Minette on May 16, 1918 and lived together as husband and wife in Baldwin County, Alabama until on or about November 26, 1949 at which time the respondent voluntarily abandoned the Complainant so far as I know without fault on her part. They have not lived together as husband and wife since that time and I do not believe they will ever live together again as husband and wife.

Nadine McMillan Klumpp

ORAL EXAMINATION.

I, Lois Wilson, 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 C. LeNoir Thompson 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 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 11th day of April, 1958

Lois Wilson (L. S.)

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

MINERVA M. KLUMPP

vs. Complainant

ANTHONYUT, KLUMPP Sr.,

Respondent.

Oral Deposition

FILED

Filed APR 11 1958, 195

Alice J. Duck, Register  
Recorded in \_\_\_\_\_, Register.

Record

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

Register

MINERVA M. KLUMPP

COMPLAINANT

VS

ANTHONY J. KLUMPP, Sr.,

RESPONDENT

\* IN THE CIRCUIT COURT OF  
\*  
\* BALDWIN COUNTY, ALABAMA.  
\*  
\* IN EQUITY.  
\*  
\* CASE NO. \_\_\_\_\_  
\*  
\*

DIVORCE DECREE

This cause coming on to be heard was submitted upon Bill of Complaint, Answer and Waiver, and Property Settlement Agreement and deposition of COMPLAINANT 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 RESPONDENT be, and the same are hereby dissolved, and that the said MINERVA M. KLUMPP, COMPLAINANT is forever divorced from the said ANTHONY J. KLUMPP, Sr., RESPONDENT, for voluntary abandonment and that under the property settlement filed herewith the said RESPONDENT has delivered to the COMPLAINANT:

FIRST: The Deed to the old home place.

SECOND: The Deed to the beach property.

THIRD: And has relinquished all his rights to the household furnishing now in the COMPLAINANT'S dwelling.

FOURTH: Has transferred by property indorsement the Cleverdon Note to COMPLAINANT.

FIFTH: Has delivered to COMPLAINANT \$1000.00 the first payment on the \$66,115.00 provided for in said agreement and has delivered a mortgage on certain real property as noted in the agreement securing the balance of said payments.

It is therefore ordered, adjudged and decreed that the RESPONDENT, ANTHONY J. KLUMPP, Sr., shall comply with the agreement make the payments of the \$66,115.00 with interest at 3 per cent per annum as called for under said agreement, and transfer all property called for being transferred under said agreement and that all of said transfers and payments being a settlement of all property rights and alimony between the parties hereto and that this decree is not a lien on any other property of ANTHONY J. KLUMPP, Sr., except on the property pledged to secure payments above mentioned unless and until default is shown to this Court to have been made in the payments ordered.

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 payment of the cost of this suit.

It is further ordered that ANTHONY J. KLUMPP, Sr., The RESPONDENT pay the cost herein to be taxed, for which executed may issue.

THIS 11<sup>th</sup> day of April, 1958.

J. Hubert M. Hall  
H. M. HALL, CIRCUIT JUDGE.

I, ALICE DUCK, 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 the file and enrolled in my office.

WITNESS my hand and seal this the \_\_\_\_\_ day of April,  
1958.

ALICE DUCK, REGISTER OF CIRCUIT COURT IN EQUITY.



FILED

APR 11 1958

ALICE J. DUCK, Register

STATE OF ALABAMA

BALDWIN COUNTY

PROPERTY SETTLEMENT

Anthony J. Klumpp, Sr. and Minerva M. Klumpp desire to settle all their property rights which may otherwise come up in the divorce action which is coming up between the parties.

Now therefore in settlement, adjustment, and in compromise of all the property questions and rights, subject to the approval of the court, Anthony J. Klumpp, Sr. agrees that on a divorce being granted to Minerva M. Klumpp on the grounds of voluntary abandonment to convey to her by warranty deed the following property:

1. The Old Home Place in the City of Fairhope.
2. The Beach Property at Point Clear.
3. To relinquish all his rights to all of the household furnishings now in her dwelling.

And to transfer and assign to Minerva Klumpp the Leroy Cleverdon note in the sum of \$36,885.00 and Anthony J. Klumpp, Sr. shall endorse said note.

And to pay the sum of \$66,115.00, with interest at 3% per annum, from the date of the divorce decree at the rate of \$1000.00 per month beginning on the date of decree and continuing for six months and the balance at the rate of \$500.00 per month thereafter until the whole sum is paid in full.

The balance may be paid in accelerated payments at the option of Anthony J. Klumpp, Sr.

The payments of both of these sums are to be secured by the

1. The Leroy Cleverdon Vendors Lien Deed or Mortgage.
2. Dairyland of 276 acres with right to substitute land of equal or better land should this property sell. Value to be determined by appraisers selected by parties.

The consideration for this transfer is Minerva M. Klumpp's proceeding at once for an absolute divorce on the grounds of voluntary abandonment and discharging Anthony J. Klumpp, Sr. for all obligations

of support and from all other claims, rights and duties arising out of their marital relations, including costs of the divorce proceedings.

Both parties agree that ~~neither~~ party will molest, interfere or annoy the other party.

And that this agreement may be used in said divorce proceedings and the court may make an award accordingly but that the decree of the court will not be a lien on any other property of Anthony J. Klumpp, Sr. except the property pledged to secure the payments above mentioned unless default is made in the payments hereunder.

In witness the parties have hereunto set their hands and seals this the 22nd day of March, 1958.

Anthony J. Klumpp, Sr.  
Minerva M. Klumpp

Edgar E. Eckhardt

Attorney for Anthony J. Klumpp, Sr.

Edgar E. Eckhardt

Attorney for Minerva M. Klumpp

Property Settlement

FILED

APR 11 1958

ALICE J. DUCK, Register

ALICE J. DUCK

On this day of April 1958, I, ALICE J. DUCK, Register of the County of ... State of ... do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the records of the County of ... State of ...

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: LOIS WILSON

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 Minerva M. Klumpp and Nadine McMillan Klumpp

a witness in behalf of Minerva M. Klumpp in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein Minerva M. Klumpp

, Complainant

and Anthony J. Klumpp Sr.,

Respondent

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

Witness day of

, 195

*Alice J. Bluck*

Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

MINERVA M. KLUMPP

Complainant

VS.

ANTHONY J. KLUMPP Sr.

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

LOIS WILSON

WITNESSES:

MINERVA M. KLUMPP

NADINE MCMILLAN KLUMPP

FILED

APR 11 1958

ALICE J. DUCK, Register

MINERVA M. KLUMPP

vs.

ANTHONY J. KLUMPP SR.

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, \_\_\_\_\_  
 Testimony of Minerva M. Klumpp and Nadine McMillan Klumpp

and in behalf of Defendant upon Answer and Waiver

*C. L. Davis*

*Alice J. Duck*

Register.

No. ....

**THE STATE OF ALABAMA**

**Baldwin County**

**IN EQUITY**

**Circuit Court of Baldwin County**

MINERVA M. KLUMPP

vs.

ANTHONY J. KLUMPP Sr.,

**NOTE OF TESTIMONY**

Filed in Open Court this

day of 15, 194

APR 11 1958

ALICE J. DUCK, Register  
Register.

Printed by the Baldwin Times



MINERVA M. KLUMPP

COMPLAINANT

VS

ANTHONY J. KLUMPP

RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

CASE NO. \_\_\_\_\_

A N S W E R & W A I V E R

Comes ANTHONY J. KLUMPP, SR., THE RESPONDENT, in the above styled cause, and for answer to the foregoing Bill of Complaint says:

Respondent admits the allegation of paragraphs "One" and "Two", of the bill.

Respondent neither admits nor denies allegation in paragraph "Three".


Respondent admits the allegations of paragraph "Four".

Respondent admits the allegation in paragraph "Five".

Respondent hereby waives notice of the taking of testimony issuance of commissions and consents that the testimony of the complainant be taken to the original bill without further notice to him.

Respondent herewith tenders deeds and security called for in the instruments, together with first payment called for and pray that upon a hearing, this cause be decided.

  
ANTHONY J. KLUMPP, SR.  
RESPONDENT

  
E. G. RICKARBY  
ATTORNEY FOR RESPONDENT

4263

TO THE HONORABLE  
SPEAKER OF THE HOUSE  
OF REPRESENTATIVES  
WASHINGTON, D. C.

DEAR MR. SPEAKER:

I am writing you today to express my sincere appreciation for the many ways in which you and the House have supported the work of the National Aeronautics and Space Administration.

As you know, the Administration has been very fortunate in having you as its leader. Your leadership and the support of the House have been instrumental in the success of the Administration's program.

Very truly yours,

WILLIAM J. DUCK, Director, National Aeronautics and Space Administration

Enclosed for the House are two copies of the report of the Administration on the progress of the work of the Administration during the past year.

I am sure that you will find this report of interest and that it will show the progress of the Administration's program.

Very truly yours,

WILLIAM J. DUCK, Director, National Aeronautics and Space Administration

cc: Bureau of Aeronautics, Department of Defense

cc: Office of the Secretary of Defense

cc: Office of the Assistant Secretary of Defense for Research and Development

FILED  
APR 11 1958

ALICE J. DUCK, Register

cc: Office of the Assistant Secretary of Defense for Research and Development

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