

(3665)

DIVORCE DECREE

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

MARGARET PAUL, Complainant

vs.

ANGUS M. PAUL, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree XXX XXX XXX~~ 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 MARGARET PAUL is forever divorced from the said ANGUS M. PAUL for and on account of

Cruelty. IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Complainant, Margaret Paul, shall have the care, custody and control of the three minor children of this marriage, namely, James William Paul, Donald Lynn Paul and Margaret Evelyn Paul, with reasonable rights of visitation to the Respondent, and that she shall be paid the sum of Ten Dollars (\$10.00) per week for their maintenance and support.

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 Margaret Paul the Complainant pay the cost herein to be taxed, for which executed may issue.

This 3rd day of December, 1955

J. Hubert M. Hall 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

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

DEC 6 1955

ALICE J. DUCK, Register

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

MARGARET PAUL

Complainant

VS.

ANGUS M. PAUL

Respondent

I, Frances G. Mallory

as Register and Commissioner in Chancery

have called and caused to come before me Margaret Paul and

witnesses named in the Requirement for Oral Examination, on the ___ day of December 195⁵, at the office of C. G. Chason in Foley, Alabama, and having first sworn said Witness es to speak the truth, the whole truth, and nothing but the truth, the said Margaret Paul and ___ doth depose and say as follows:

Testimony of Margaret Paul:

My name is Margaret Paul. I am over the age of twenty-one years and a resident of Baldwin County, Alabama, having been such a resident citizen my entire life. Angus M. Paul is over the age of twenty-one years and is also a resident of Baldwin County, Alabama. We were married on November 12, 1947, and lived together as man and wife until October 28, 1955, when, because of the injury and violence done to me, I was unable longer to live with him as husband and wife. Angus M. Paul beat me with his fist and did other acts of violence on my person attended with danger to my life and health, and has made other and numerous threats of doing me other and further harm and I am convinced that he would do other violence on my person, attended with danger to my life or health should I continue to live with him. We have three children, James William Paul, who is 6 years of age, Donald Lynn Paul, who is 3 years of age and Margaret Evelyn Paul, who is 2 years of age, all of whom are in my custody and control. Angus M. Paul is employed as a mechanic at this time and has an income of approximately \$36.00 per week and I believe that he is financially able to pay the sum of \$10.00 per week for the support and maintenance of these minor children.

Signed: Margaret Paul

Testimony of Varie Morris:

My name is Varie Morris. I am over the age of twenty-one years and a resident citizen of Baldwin County, Alabama. I am personally acquainted with Margaret Paul and Angus M. Paul. They are both residents of Baldwin County, Alabama, and both are over the age of twenty-one years. They were married on November 12, 1947. On several occasions I have known of his striking her, bruising her and committing acts of violence on her person. I have also known of his threatening her that he was going to do other violence on her person, attended with danger to her life or health, and believe that it is reasonable for her to believe that he would do so. They have three children, James William Paul, Donald Lynn Paul and Margaret Evelyn Paul, all of whom are in the care, custody and control of Margaret Paul since the separation in October. Angus M. Paul is presently employed as a mechanic.

Signed: Varie Morris

ORAL EXAMINATION.

I, Frances G. Mallory, 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. G. Chason 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; 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 2nd day of December, 1955.

Frances G. Mallory (S.)

NO. 2665 PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

MARGARET PAUL

vs. Complainant

ANGUS M. PAUL

Respondent.

Oral Deposition

Filed _____, 195

FILED

Register.

Recorded

Record

Vol. _____ Page _____

Register

MARGARET PAUL
Complainant,
-vs-
ANGUS M. PAUL
Respondent.

BOOK 018 PAGE 60

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:

Comes your Complainant, Margaret Paul, and files this her Bill of Complaint for Divorce against Angus M. Paul, and respectfully represents and shows unto your Honor:

1. That Complainant and Respondent are both over the age of twenty-one years, and both bona fide residents of Baldwin County, Alabama, having been such for many years.

2. That your Complainant and the Respondent were lawfully married on, to-wit, November 12, 1947.


3. Complainant further avers that the Respondent has committed actual violence on her person attended with danger to her life and health, and from his conduct she is reasonably apprehensive of other and further violence, so much so that she can no longer live with the Respondent; that the Respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her she is reasonably convinced that he will commit actual violence on her person attended with danger to her life or health.

4. Complainant further shows unto the Court that there has been born of this marriage, three children, namely, James William Paul, six years of age, Donald Lynn Paul, three years of age, and Margaret Evelyn Paul, two years of age, who are in her care, custody, and control. Complainant further shows that Respondent is presently employed at a wage of Thirty-six Dollars (\$36.00) per week, and that he is financially able to pay the sum of Ten Dollars (\$10.00) per week for the support and maintenance of these minor children.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, Your Complainant prays that Angus M. Paul be made a party defendant to this cause by the usual

process of this Honorable Court, requiring him to plead, answer, or demurr within the time and under the penalties prescribed by the laws of this Court and the statutes in such cases made and provided; that upon a final hearing of this cause that she be granted a divorce from the said Respondent, and that she be granted custody and control of the minor children hereinabove named, with Respondent having rights of reasonable visitation. Complainant further prays that the Respondent be required to pay the sum of Ten Dollars (\$10.00) per week as support and maintenance of the minor children hereinabove named. Should your Complainant be mistaken in the relief prayed for that she be granted such other, further and different and general relief to which she may be entitled and as in duty bound she will ever pray.


Solicitor for the Complainant

BOOK 018 PAGE 61

MARGARET PAUL
Complainant,
- vs -
ANGUS M. PAUL
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
INEQUITY

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 contained 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.
4. He admits the allegations contained in Paragraph 4 of said Bill of Complaint.

Angus M. Paul
Respondent

Sworn to and subscribed before me, a Notary Public, on this the 18 day of November, 1955.

Dwain M. Bauer
Notary Public, Baldwin County
State of Alabama



COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: FRANCES G. MALLORY

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 Margaret Paul and Varie Morris

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

_____, Complainant
and Angus M. Paul

_____, Respondent

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

Witness 2nd day of December, 1955

Alice J. Duck
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. 3665

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

MARGARET PAUL

Complainant—

vs.

ANGUS M. PAUL

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

WITNESSES:

MARGARET PAUL

vs.

ANGUS M. PAUL

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 Margaret Paul and Varie Morris

and in behalf of Defendant upon Answer and Waiver

[Signature]
Substitue for Complainant

[Signature]
Register.

No. 3665.....

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

MARGARET PAUL

vs.

ANGUS M. PAUL

NOTE OF TESTIMONY

Filed in Open Court this

day of 194

FILED
DEC 2. 1955

ALICE L. DUCK Register.

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