

MARQUIAN HOLLOWAY PAUL)
Complainant)
-vs-)
EARNEST RICHMAN PAUL)
Respondent)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

To the Honorable Judge of the Circuit Court of Baldwin County,
Alabama, Sitting in Equity:

Your complainant Marquian Holloway Paul respectfully
represents and shows unto your Honor:

1. That complainant is over the age of twenty-one
years and is a resident of said State and County, and has been
a bona fide resident of said State for more than five years next
preceding the filing of this bill of complaint; that Earnest Rich-
man Paul is over the age of twenty-one years and resides in Bald-
win County, Alabama.

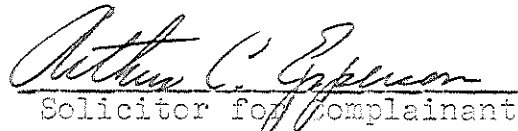
2. That your complainant and respondent were lawfully
married on or about, to-wit, May 17, 1948, at Bay Minette, Ala-
bama, and of this marriage there are two minor children, namely,
Patricia Jean Paul, six years of age, and James Maxwell Paul,
four years of age.

3. Your complainant further avers and alleges that the
said respondent has, since her said marriage with him, become ad-
dicted to habitual drunkenness, and that said habit has continued
to the filing of this bill.

4. That complainant and respondent have entered into
an agreement with reference to the custody and control and the
support and maintenance of the said minor children, a copy of
which is hereto attached as Exhibit A and made a part hereof;
and by the terms of which agreement the complainant shall have
the care, control and custody of the said minor children and the
respondent shall pay to the complainant the sum of Twenty Dollars
a week for the support and maintenance of the said minor children.

Complainant avers that this is a reasonable, just and
proper agreement and prays the court that in the event a decree
of divorce is given in this cause that the court will decree that
the parties keep and abide by the terms of said agreement.

The premises considered, your complainant makes the said
Earnest Richman Paul a party respondent to this bill of complaint,
and in order that complainant may have the relief herein prayed
for, may it please your Honor to cause the State's writ of subpoena
to be issued, directed to the said Earnest Richman Paul, command-
ing him to answer, plead or demur to this bill of complaint, with-
in the time required by law; and that on a final hearing of this
cause, that your Honor will enter a decree divorcing your complain-
ant from said respondent; and that your Honor will grant such other,
further and different relief as unto your Honor may seem just and
proper, and your complainant will ever pray.


Solicitor for Complainant

RESPONDENT' ADDRESS

Earnest Richman Paul
C/o Irwin's Potato Shed
Foley, Alabama

2044 IN THE CIRCUIT COURT OF *

3787 BALDWIN COUNTY, ALABAMA

IN EQUITY

MARQUIAN HOLLOWAY PAUL
Complainant

- VS -

EARNEST RICHMAN PAUL
Respondent

BILL OF COMPLAINT

Received 16 day of May 1956
and on 18 day of May 1956

I served a copy of the within
on Earnest Richman Paul

By service on

TAYLOR WILKINS Sheriff
By *Paul Foley* D. S.

Foley

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20
TAYLOR WILKINS, Sheriff
BY *Chadwell*
DEPUTY SHERIFF

W

*Filed 5/15/56
Alice J. D., Registrar*

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALA.