

3842

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

BETTY JOYCE PAUL, Complainant

vs.

HERMAN PAUL, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso on~~ 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 Betty Joyce Paul is forever divorced from the said Herman Paul for and on account of Cruelty.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Complainant, Betty Joyce Paul, shall have the care, custody and control of the minor child, Herman Jerome Paul, age about three years.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent, Herman Paul, shall have reasonable rights of visitation with the said minor child, Herman Jerome Paul, age about three years.

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 Herman Paul the Respondent pay the cost herein to be taxed, for which executed may issue.

This 13th day of August 1956

Hubert M. Steel 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. 3847 Page _____

RECORDED

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

BETTY JOYCE PAUL

Complainant

vs.

HERMAN PAUL

Respondent

DIVORCE DECREE

FILED

AUG 14 1956

ALICE J. DUCK, Register

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 Betty Joyce Paul and James C. Barlow

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

Complainant
and Herman Paul

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 7 day of Aug, 1956

Alice J. Hurst
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

BETTY JOYCE PAUL

Complainant

VS.

HERMAN PAUL

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

LOIS WILSON

FILED
AUG 11 1960

WITNESSES:

BETTY JOYCE PAUL, Register

JAMES C. BARLOW

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BETTY JOYCE PAUL

vs.

HERMAN 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, _____
Testimony of Betty Joyce Paul and James C. Barlow.

and in behalf of Defendant upon Answer and Waiver.

C. Davis Thompson

Wince J. Danch

Register.

RECORDED

No. 3847.....

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

BETTY JOYCE PAUL

vs.

HERMAN PAUL

NOTE OF TESTIMONY

Filed in Open Court this
day of, 194

FILED
AUG 11 1956

WALTER J. DUCK, Register

Register.

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

BETTY JOYCE PAUL

Complainant

VS.

HERMAN PAUL

Respondent

I, Lois Wilson

as Register and Commissioner

have called and caused to come before me Betty Joyce Paul and James C. Barlow

witness^{es} named in the Requirement for Oral Examination, on the 7th day of August 1956, at the office of C. LeNoir Thompson in Bay Minette, Alabama, and having first sworn said Witness^{es} to speak the truth, the whole truth, and nothing but the truth, the said Betty Joyce Paul and James C. Barlow doth depose and say as follows:

That my name is Betty Joyce Paul, I am over the age of 16 and a resident of Baldwin County, Alabama. The Respondent Herman Paul is over the age of 21 and a resident of Baldwin County, Alabama. We were married in Baldwin County on December 29, 1952 and lived together as husband and wife until the time of our separation in Baldwin County on February 20, 1956. At the time of the separation the Respondent became angry with me and jumped on me throwing me down and striking me about the face and head so that I became in fear of my life or health and knew that I could never live with him any more as his wife. We have not lived together since the occasion on February 20th and I know that I can never live with him anymore as his wife. There are two children born as fruits of this marriage and another child will be born on or about the last of September 1956. We have agreed that I am to have the custody of the older child, Herman Jerome Paul, age about three and I ask that a copy of our agreement be made a part of our testimony. We have also agreed that I shall have the care custody and control of the unborn child. The little girl age one year Rhonda Gayle Paul, we permitted and signed papers for the Respondent's brother, Robert Paul and his wife Martha to adopt her and this has been done. I do not ask for any maintenance or support for the children. I have agreed that the Respondent have the right to visit with Herman Jerome and have the little boy to visit with the Respondent at reasonable time and occasions. We have no property to be divided.

Betty Joyce Paul

That my name is James C. Barlow, I know both parties to this cause, they are both residents of Baldwin County, Alabama and have been more than two years next preceeding. Betty Joyce is over the age of 16 and Herman Paul is over the age of 21. They were married in Baldwin County, Alabama on December 29, 1952 and lived together as husband and wife until they separated in Baldwin County on or about February 20, 1956. At the time of the separation there was an altercation and the Complainant was abused so that she became in fear of her life or health. I do not believe they will ever live together again as husband and wife. I donot believe they ~~have~~ lived together since February 20th as husband and wife. There are two children born of this marriage and another will be born sometime in September or shortly thereafter. The older child Herman Jerome age about three is presently with Betty Joyce Paul, the second child Rhonda Gayle Paul has been adopted by Herman's brother Robert Paul and his wife Martha. They have no property to be divided.

James C. Barlow

ORAL EXAMINATION.

I, Lois Wilson, as Register and Commissioner hereby certify that the foregoing deposition s 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 7th day of August, 1956

Lois Wilson (L. S.)

NO	PAGE
THE STATE OF ALABAMA	
BALDWIN COUNTY	
IN CIRCUIT COURT, IN EQUITY	
BETTY JOYCE PAUL	Complainant
vs.	
HERMAN PAUL	Respondent
Oral Deposition	
Filed	195
FILED	
Recorded in	
AUG 11 1956	
Record	Register
Vol.	Page
AUG 1, DUCK, Register	
Register	Register

BETTY JOYCE PAUL,	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT	Ø	BALDWIN COUNTY, ALABAMA
VS	Ø	IN EQUITY.
HERMAN PAUL	Ø	
RESPONDENT	Ø	

Now comes the Respondent and accepted service of the summons and complaint in this cause.

The Respondent admits the allegations as to ages, marriage and residence, but denies all other allegations contained in the bill of complaint, and demands strict proof of the same.

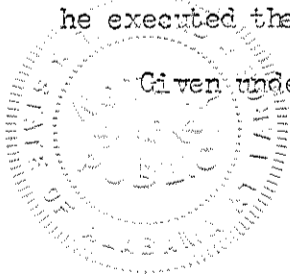
The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross-examine Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

Herman Paul

STATE OF ALABAMA
BALDWIN COUNTY

I, T.C. Hand, A Notary Public, in and for said County, in said State, hereby certify that Herman Paul, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that, being informed of the contents of the conveyance he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 7 day of August, 1956.



T.C. Hand
Notary Public, Baldwin County, Alabama

MY COMMISSION AS A NOTARY PUBLIC
EXPIRES 30. OF Jan 1960.

3847

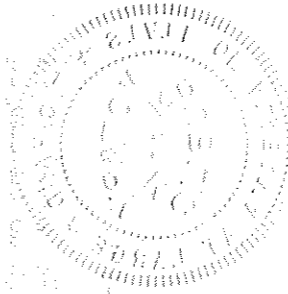
BETTYJOYCE PAUL

COMPLAINANT

VS

HERMAN PAUL

RESPONDENT



ANSWER AND WAIVER

FILED
AUG 11 1966
ALICE H. DUCK, Register

From the law offices of
C. LeNoir Thompson
Bay Minette, Alabama

STATE OF ALABAMA
BALDWIN COUNTY

BE IT HEREBY AND HEREINAFTER AGREED between the parties that having found it impossible to live together and that a divorce being in progress in order to avoid litigation over the custody of the one child remaining at home Herman Jerome Paul, age three years and to further provide for the custody of the unborn child expected the latter part of September, it is agreed that Betty Joyce Paul will have the care, custody and control of these two children, that Herman Paul will have the right to visit them at all reasonable times and have them visit with him when it will not endanger the children or inconvenience their attending school of which they may be a member.

It is further agreed between the parties that no maintenance or support will be required for the children by Betty Joyce Paul from Herman Paul. Both parties agree that they will keep each other informed as to the address and whereabouts of the children at all times.

Herman Paul
Betty Joyce Paul

STATE OF ALABAMA
BALDWIN COUNTY

Before me the undersigned authority personally appeared Herman Paul and Betty Joyce Paul, who being informed of the contents executed the said agreement set out above voluntarily on this the 7th day of August, 1956.

C. L. [Signature]
Notary Public, Baldwin County, Alabama.

3847

BETTY JOYCE PAUL

COMPLAINANT

VS

HERMAN PAUL

RESPONDENT

AGREEMENT

FILED

AUG 11 1956

ANGIE M. DUCK, Register

From the law offices of

C. LeNoir Thompson
Bay Minette, Alabama.

RECEIVED BY CLERK
COURT HOUSE
BAY MINETTE

THIS AGREEMENT WAS MADE AND ENTERED INTO BY AND BETWEEN THE PARTIES HERETO AND IS HEREBY FILED FOR THE RECORD OF THE COURT IN THE ABOVE ENTITLED MATTER.

STATE OF ALABAMA
BALDWIN COUNTY

BOOK 022 PAGE 239

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons HERMAN PAUL, 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 BETTY JOYCE PAUL as Complainant and against HERMAN PAUL, as Respondent.

WITNESS my hand this the _____ day of _____, 1956.

Register.

BETTY JOYCE PAUL
COMPLAINANT
VS
HERMAN PAUL
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.
CASE NO. _____

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

Your Complainant, Betty Joyce Paul, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 18 and is a resident of Baldwin County, Alabama, and has been more than two years next preceeding; the Respondent is over the age of 21 and is a resident of Baldwin County, Alabama, and has been more than two years next preceeding.

2.

That your Complainant and the Respondent married in Baldwin County, Alabama on December 29, 1952 and lived together as husband and wife in Baldwin County, until February 20, 1956.

3.

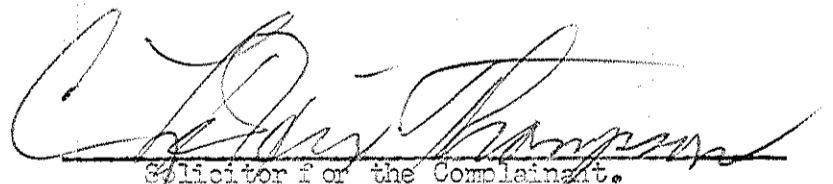
That on February 20, 1956, and on several occasions prior thereto the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health. The conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with him he would carry out his threats and do actual violence to her person, which would necessarily endanger her life and health.

4.

There was born as fruits of this marriage two children Herman Jerome Paul, age about three years, presently in your Petitioners care, custody and control and Rhonda Gayle Paul, age about one year which the parties to this cause have permitted to be adopted by Robert Paul and wife Martha Paul. Your Complainant is presently pregnant with a child of the Respondent which will be born in September. No maintenance or support is requested or desired for these children.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said Herman Paul, 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 both parties an absolute decree of divorce forever barring the bonds of matrimony existing between the Complainant and the Respondent and that a decree be made awarding the Complainant, who now has the care, custody and control of the infant child, Herman Jerome Paul, age about three years, the care, custody and control of said child pending further orders of this Court; and of the child to be born in September; 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.

BETTY JOYCE PAUL

COMPLAINANT

VS

HERMAN PAUL

RESPONDENT

SUMMONS AND COMPLAINT

*Filed 8-11-56
Alice J. Neuch
Reynolds*

From the law offices of

C. LeNoir Thompson
Bay Minette, Alabama

3847