

EXHIBIT "A"

3941

IN THE CHANCERY COURT OF THE DANVILLE DISTRICT OF YELL COUNTY
STATE OF ARKANSAS

Clyde K. Bass, Plaintiff,

vs.

No. 3126

Mamie Louise Bass, Defendant.

DECREE OF DIVORCE

Now on this 7th day of August, 1956, the above cause comes on to be heard. The plaintiff is present in person and by his attorney, Mr. J. H. Evans, and the defendant appears not but wholly makes default. The cause is presented to the Court on the complaint of plaintiff, an affidavit for warning order, appointment and acceptance of attorney ad-litem for the non-resident defendant, the publication of warning order for the time and in the manner prescribed by law, oral testimony of witnesses and other matters and things before the Court, from all of which the Court finds:

1. That plaintiff has been a bona fide resident of the Danville District of Yell County, Arkansas, for more than one year last past; that an affidavit for warning order was made by plaintiff in the form and manner prescribed by law stating that defendant was a non-resident of the State of Arkansas and that personal service of summons could not be had on her; that an attorney ad-litem was appointed for the non-resident defendant as required by law; that said attorney ad-litem notified defendant of the pendency of this action and sent her a copy of the complaint all in the form and manner required by law; that said attorney ad-litem filed his report herein showing that defendant received notification of the pendency of this action; that defendant had actual notice of the pendency of this action; that a warning order was published against her for the time and in the manner prescribed by law; that this action was filed and commenced more than 30 days ago; that this Court has jurisdiction of the parties and subject matter

of this action.

2. That the parties hereto were married July 28, 1941; that the defendant's legal name is Mamie Louise Hays and she has gone under this name all during said marriage but that the marriage license was issued under the name of Earma Leslie Hays.

3. That since their marriage on July 28, 1941, the parties hereto lived and cohabited together as husband and wife until they separated on May 16, 1956, because of adultery committed by defendant; that on April 12, 1956, and April 21, 1956, the defendant committed adultery by having sexual intercourse with one Floyd Turley; that plaintiff is therefore entitled to a decree of absolute divorce from defendant; that plaintiff's cause of action for divorce occurred and existed in the State of Arkansas within five years last past.


4. That the following named children were born of this marriage, to-wit: Judson L. Bass, a son, age 14; Marron Grady Bass, a son, age 11; Vonda Velner Bass, a daughter, age 9; Clyde Kermit Bass, Jr., a son, age 6; Riley Bennett Bass, a son, age 4.

5. That defendant has engaged in numerous extra-marital relationships during the past year and has taken the above named children with her on some of these occasions; that she has taken these children with her and roamed the streets and countryside until late at night; that she has not properly cared for said children; that she is an unfit person to have custody of said children and it would be to the best interest of said children to award their permanent custody to the plaintiff; that plaintiff is able to give them a good home and the care and attention which they need.

6. That no property rights are involved between the parties hereto.

It is therefore by the Court considered, ordered and decreed that plaintiff, Clyde K. Bass, be, and he is hereby granted an absolute divorce from defendant, Mamie Louise Bass, and that the bonds of matrimony heretofore existing between the parties hereto are hereby canceled, set aside, and held for naught and the parties restored to all the privileges of single and unmarried persons; it is by the Court further ordered and decreed that plaintiff, Clyde K. Bass, be, and he is hereby awarded permanent custody of Judson L. Bass, Marron Grady Bass, Vonda Velner Bass, Clyde Kermit Bass, Jr., Riley Bennett Bass, all of whom are minor children of the parties hereto.

Witness my hand this 7th day of August, 1956.


Paul X. Williams, Judge

CERTIFICATES OF AUTHENTICATION

STATE OF ARKANSAS }
 County of Yell } ss.

I, Fay Mathis as clerk of the Chancery Court, of Danville District of Yell County, Arkansas, do hereby certify that the foregoing three page 5 of typewritten matter contains a true, perfect, full complete and compared transcript of a decree of divorce of the Chancery Court, in the August, 1956 term of said Chancery Court then pending in said court, styled Clyde K. Bass, plaintiff and Mamie Louise Bass defendant, and duly entered on record in the record book of said court, labeled CHANCERY Record Volume J. at page 344

IN TESTIMONY WHEREOF, I, as such clerk hereunto subscribe my name, and affix the seal of said court, at the City of Danville in said Danville District of Yell County, in the State of Arkansas, this the 15th day of August, A. D., 1956.

Fay Mathis
 Clerk.

STATE OF ARKANSAS }
 County of Yell } ss.

I, Paul X. Williams, the sole Judge of the Chancery Court of Yell County, Danville District in the State of Arkansas, do hereby certify that Fay Mathis whose name is subscribed to the foregoing attestation, was at the time of his making said certificate of authentication, and is now, the duly elected, commissioned, qualified and acting clerk of said court, that as such clerk he is, under the laws of the State of Arkansas, the legal custodian of the records of said court, and the officer authorized by the laws of said State to make the said certificate of authentication; that as such clerk his certificates, attestations, acts and doings are entitled to full faith and credit; and that his foregoing attestation of the transcript is in due form.

IN TESTIMONY WHEREOF, I do hereunto subscribe my name as the Judge of said court, at the City of Danville in the State of Arkansas, this 15th day of August, A. D., 1956.

Paul X Williams

STATE OF ARKANSAS }
 County of Yell } ss.

I, Fay Mathis as clerk of the Chancery Court, of Yell County, the State of Arkansas, Danville District do hereby certify that Paul X. Williams whose name is subscribed to the foregoing certificate, is is the sole Judge of the Chancery Court; and he was such when said certificate was made; and that the signature thereto is his genuine signature.

IN TESTIMONY WHEREOF, I hereunto subscribe my name as such clerk, and affix the seal of said court at the City of Danville in the State of Arkansas, this 15th day of August, A. D., 1956.

Fay Mathis
 Clerk.

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

January 2, 1957

1957
Mrs. Alice J. Duck
Register in Equity
Circuit Court
Bay Minette, Alabama

RE: Bass v. Hays

Dear Mrs. Duck:

I am enclosing a bill of complaint in the above matter. Since the bill seeks a temporary restraining order, I will appreciate your ascertaining from Judge Hall the amount of bond he will require in order that we can post same and the temporary restraining order can be served.

Thank you.

Sincerely,


JAMES A. BRICE

JAB:ss

SUMMONS

THE STATE OF ALABAMA)	IN THE CIRCUIT COURT OF
BALDWIN COUNTY)	BALDWIN COUNTY, ALABAMA
		IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon Mamie Louise Hays 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 Clyde K. Bass, as Complainant, against Mamie Louise Hays, as Respondent.

Witness my hand this 4 day of Jan, 1957.

Arice L. Duck
Register

CLYDE K. BASS
Complainant
V.
MAMIE LOUISE HAYS
Respondent

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, Clyde K. Bass, and respectfully
shows and represents unto the Court as follows:


1. That your complainant is over twenty-one years of
age, and a bona fide resident citizen of Baldwin County,
Alabama, and has been such since September, 1956; that the
respondent is a resident citizen of Baldwin County, Alabama,
and is over the age of twenty-one years.

2. That prior to your complainant and the respondent
becoming a resident citizens of Baldwin County, Alabama, they
were resident citizens of the Danville District of Yell
County, Arkansas; that while they were such resident citizens
of said District, and while they were subject to the laws of
the State of Arkansas and subject to the jurisdiction of the
Chancery Court of the Danville District Yell County, Arkansas,
your complainant did, on the 7th day of August, 1956, obtain
a decree of divorce from the respondent in said Chancery Court
of the Danville District of Yell County, Arkansas, a certified
copy of which decree is attached hereto and marked "Exhibit A"
and made a part hereof as though fully set forth herein; that
the said decree of divorce was rendered in accordance with the
laws of the forum by a court having jurisdiction of the subject
matter and of the parties, and is entitled to full faith and
credit in this Honorable Court.

3. That under the provisions and terms of the said decree,
your complainant was awarded the permanent custody of the minor

children of the complainant and respondent, namely: Judson L. Bass, Marron Grady Bass, Vonda Velner Bass, Clyde Kermit Bass, Jr., and Riley Bennett Bass; that the respondent has had custody of the said minor children prior to and at all times since the rendition of the aforesaid decree of divorce, and has failed and refused to surrender and deliver up to your complainant the custody and control of the aforesaid minor children; that said minor children are living with the respondent at or near Loxley, Alabama, and are subject to the jurisdiction of this court.

WHEREFORE, THE PREMISES CONSIDERED, your complainant prays that Mamie Louise Hays be made a party respondent to this bill of complaint by due process and that she be required to demur, plead or answer said bill of complaint within the time and in the manner stipulated by law and the rules of this Court. Complainant further prays that a temporary restraining order be granted by this Court restraining the said respondent from removing the said minor children from Baldwin County, Alabama during the pendency of this cause or until the further order of this Court; and that upon a final hearing your Honor will issue a writ of mandatory injunction commanding the respondent to deliver up the custody of the said Judson L. Bass, Marron Grady Bass, Vonda Velner Bass, Clyde Kermit Bass, Jr., and Riley Bennett Bass unto your complainant. And if mistaken in the relief hereinabove prayed for, your complainant prays for such other further, and general relief as to which in equity and good conscience he may be entitled.


Solicitor for Complainant

SUMMONS

THE STATE OF ALABAMA)
BALDWIN COUNTY)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

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Witness my hand this 14 day of June, 1957.

Reverend J. W. White
Register

CLYDE K. BASS

Complainant

V.

MAMIE LOUISE HAYS

Respondent

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, Clyde K. Bass, and respectfully
shows and represents unto the Court as follows:


1. That your complainant is over twenty-one years of
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Alabama, and has been such since September, 1956; that the
respondent is a resident citizen of Baldwin County, Alabama,
and is over the age of twenty-one years.

2. That prior to your complainant and the respondent
becoming a resident citizens of Baldwin County, Alabama, they
were resident citizens of the Danville District of Yell
County, Arkansas; that while they were such resident citizens
of said District, and while they were subject to the laws of
the State of Arkansas and subject to the jurisdiction of the
Chancery Court of the Danville District Yell County, Arkansas,
your complainant did, on the 7th day of August, 1956, obtain
a decree of divorce from the respondent in said Chancery Court
of the Danville District of Yell County, Arkansas, a certified
copy of which decree is attached hereto and marked "Exhibit A"
and made a part hereof as though fully set forth herein; that
the said decree of divorce was rendered in accordance with the
laws of the forum by a court having jurisdiction of the subject
matter and of the parties, and is entitled to full faith and
credit in this Honorable Court.

3. That under the provisions and terms of the said decree,
your complainant was awarded the permanent custody of the minor

children of the complainant and respondent, namely: Judson L. Bass, Marron Grady Bass, Vonda Velner Bass, Clyde Kermit Bass, Jr., and Riley Bennett Bass; that the respondent has had custody of the said minor children prior to and at all times since the rendition of the aforesaid decree of divorce, and has failed and refused to surrender and deliver up to your complainant the custody and control of the aforesaid minor children; that said minor children are living with the respondent at or near Loxley, Alabama, and are subject to the jurisdiction of this court.

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Solicitor for Complainant

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