

4036

MARQUIAN PAUL,
Complainant,
-vs-
RICHMOND PAUL,
Respondent.

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

AMENDED BILL OF COMPLAINT

Comes the Complainant in the above styled cause and files this her Amdnded Bill of Complaint and respectfully shows unto this Honorable Court the following:-

1. That the Complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama, having been such a bona fide resident citizen for more than one year. That Richmond Paul is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

2. That the Complainant and Respondent were lawfully married on, to-wit, July 17, 1948.

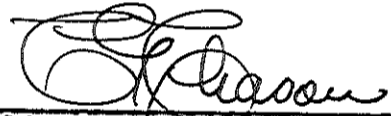
3. Complainant further avers that the Respondent has committed actual violence on her person attended with danger to her life and health, by striking her with his fists, and from his conduct toward her, she is reasonable apprehensive of other and further violence, so much so that she can no longer live with the Respondent; that the Respondent has made numerous threats of doing her other and further 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 that the Respondent has, after their marriage, become addicted to habitual drunkenness, and that the habit continues to this date.

5. Complainant further shows to the Court that there was born of this marriage two (2) children, namely, Patricia Jean Paul, 8 years of age, and James Maxwell Paul, 6 years of age, who are in the care, custody and control of the Complainant.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that Richmond Paul be made a party defendant of this cause by the usual process of this Honorable Court, requiring him to plead, answer or demur within the time and under the panalties prescribed by the Rules 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 Richmond Paul, and that she be granted custody and control of the minor children hereinabove named, and that she be granted such sums for the support of the minor children as the Court believes meet and proper. Should your Complainant be mistaken in the relief prayed for that she be granted such other, further, different and general relief to which she may be entitled and as in duty bound she will ever pray.



Solicitor for Complainant

Filed March 4, 1958

54B

MARQUIAN HOLLOWAY PAUL

COMPLAINANT

VS

EARNEST RICHMAN PAUL

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

Comes the Respondent in the above styled cause and moves to quash the complaint served on him and as grounds for said motion shows unto this Honorable Court as follows:

1.

That said service was had on the Sabbath day, to-wit: Sunday, June 16.

2.

That the record fails to disclose any compliance with Title 7 Section 346 as set out in the 1940 Code of Alabama, hence this motion.

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Attorney for Respondent

MARQUIAN HOLLOWAY PAUL)
Complainant)
VS.)
EARNEST RICHMAN PAUL)
Respondent)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

CASE NO. 4036

The matter of the petition of the complainant in the above stated cause for temporary alimony having been presented to the Court for an order of reference to the Register to ascertain and report the proper amount of temporary maintenance and support for complainant and the minor children of the marriage and solicitor's fees to be paid by the respondent pending the litigation in the above stated cause, and the same being duly considered by the Court, it is,

Ordered, adjudged and decreed by the Court that the Register of this Court be and is hereby ordered to hold a reference in accordance with the prayer of the petition, after giving the respondent as much as three days notice of such reference, and to take testimony as to a proper amount to be allowed to complainant as a temporary support and maintenance pending the litigation. Also a proper amount to be paid by respondent to the complainant's Solicitors of record for their services in said cause, and make a report of her findings, together with the testimony. All other matters are held for further orders and decrees of this Court.

Done this 31st day of July, 1957.

Hubert M. Hall
Judge

MARQUIAN HOLLOWAY PAUL
Complainant
VS
EARNEST RICHMAN PAUL
Respondent

IN CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO: ERNEST RICHMAN PAUL, RESPONDENT

You are hereby notified that on the 13 day of Aug 1957, at 2:00 O'clock P.M., at the office of the Register, I shall proceed to execute ~~xxx~~ the reference, as ordered and directed by the decree rendered in the above cause, at which time and place you are required to attend

Witness my hand this 31st day of July, 1957.

Arice J. Hurch
Register.

Executed by serving a copy of the within on Earnest Richman Paul, Respondent, on this the 31st day of July, 1957.

Sheriff of Baldwin County, Ala.

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 Richman Paul is over the age of twenty-one years and resides in Baldwin County, Alabama.

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

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

4. Your complainant avers and charges that 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 an actual violence upon her person, attended with danger to her life or health.

5. Complainant avers that respondent is employed and making about \$75.00 a week; That the complainant owns no property and has no means of support for herself and minor children; and that said respondent has refused and failed to provide for the support and maintenance of the complainant and said minor children; your complainant further avers that she is without means to pay her solicitor of record for his services rendered and to be rendered in this suit.

The premises considered, your complainant prays that your Honor will order service to be had according to law upon said respondent, commanding him to appear and plead, answer or demur to this bill of complaint within the time required by law and that your Honor will hold a hearing and award the complainant temporary care, control and custody of the said minor children, pending this suit, and that your Honor will order the Register of this Court to hold a reference and report to this Court what would be a reasonable amount to be allowed your complainant as alimony for her support and maintenance of the said minor children, pending this suit, and what would be a reasonable amount to be allowed your complainant's solicitor for his services rendered and to be rendered in this suit, and that upon a final hearing of this cause, that your Honor will render a decree divorcing your complainant from the respondent, granting the complainant permanent care, control and custody of the said minor children, permanent alimony for her support and maintenance and support and maintenance for said minor children, and that your Honor will order, permanent attorney fees for the sum of \$250.00 for her attorney of record; your complainant prays for each other, further or general relief to which she may be entitled.

IN THE CIRCUIT COURT OF
BLADWIN COUNTY, ALABAMA
IN EQUITY

Marquian Paul
COMPLAINANT

VS

Earnest Richman Paul
RESPONDENT

No. 4036

BILL OF COMPLAINT

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALA.

FILED

MAY 17 1957

ALICE L. WICK, Register

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No. 4036

..... TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ERNEST RICHMAN PAUL

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

ERNEST RICHMAN PAUL....., Defendant.....

by MARQUAIN PAUL....., Plaintiff.....

Witness my hand this.....17th.....day of.....May.....19-57

Alice J. Smith....., Clerk

Executed June 15, 1957

No. 4036

Page

The State of Alabama

Baldwin County

CIRCUIT COURT

MARQUAIN PAUL

Plaintiffs

vs.

ERNEST RICHMAN PAUL

Defendants

Summons and Complaint

Filed

5/17/57

19

Alice J. Duck

Clerk

Blue Ford 57

Front Beard

Tail down Feb 57

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19

Sheriff

I have executed this summons

this June 15 1957

by leaving a copy with

Ernest Richman Paul

Sheriff claims 70 miles at

Ten Cents per Mile 7.00

TAYLOR WILKINS, Sheriff

BY

Ernest Richman Paul
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Ernest Richman Paul Deputy Sheriff

Vernon Paul

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 Richman Paul is over the age of twenty-one years and
resides in Baldwin County, Alabama.

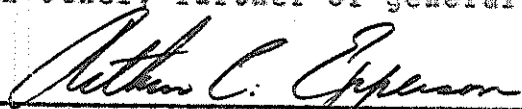
2. That your complainant and respondent were lawfully
married on or about, to-wit, May 17, 1948, at Bay Minette, Ala-
bama, and of this marriage there are two minor children, namely,
Patrica Jean Paul, seven years of age, and James Maxwell Paul,
five years of age.

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

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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 an actual violence upon her person, attended
with danger to her life or health.

5. Complainant avers that respondent is employed and
making about \$75.00 a week; That the complainant owns no property
and has no means of support for herself and minor children; and
that said respondent has refused and failed to provide for the
support and maintenance of the complainant and said minor child-
ren; your complainant further avers that she is without means
to pay her solicitor of record for his services rendered and
to be rendered in this suit.

The premises considered, your complainant prays that
your Honor will order service to be had according to law upon
said respondent, commanding him to appear and plead, answer
or demur to this bill of complaint within the time required
by law and that your Honor will hold a hearing and award the
complainant temporary care, control and custody of the said
minor children, pending this suit, and that your Honor will
order the Register of this Court to hold a reference and report
to this Court what would be a reasonable amount to be allowed
your complainant as alimony for her support and maintenance
of the said minor children, pending this suit, and what would
be a reasonable amount to be allowed your complainant's
solicitor for his services rendered and to be rendered in this
suit, and that upon a final hearing of this cause, that your
Honor will render a decree divorcing your complainant from the
respondent, granting the complainant permanent care, control
and custody of the said minor children, permanent alimony for
her support and maintenance and support and maintenance for said
minor children, and that your Honor will order, permanent
attorney fees for the sum of \$250.00 for her attorney of record;
your complainant prays for each other, further or general relief
to which she may be entitled.


SOLICITOR FOR COMPLAINANT

CECIL G. CHASON

ATTORNEY-AT-LAW
FOLEY, ALABAMA

May 6, 1958

Mrs. Alice J. Duck, Register
Bay Minette, Alabama

Re: Marquian Paul -vs- Richmond Paul

Dear Mrs. Duck:

Marquian Paul has very wisely decided that she needs support for her children much more than she needs a divorce, therefore, please again mark her divorce proceeding dismissed.

Yours very truly,



C. G. Chason

CGC:fm

MARQUIAN HOLLOWAY PAUL)
Complainant)
VS.)
EARNEST RICHMAN PAUL)
Respondent)

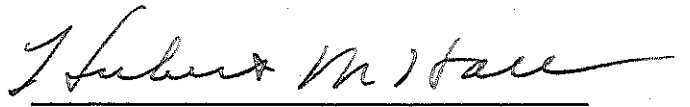
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

CASE NO. _____

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Ordered, adjudged and decreed by the Court that the Register of this Court be and is hereby ordered to hold a reference in accordance with the prayer of the petition, after giving the respondent as much as three days notice of such reference, and to take testimony as to a proper amount to be allowed to complainant as a temporary support and maintenance pending the litigation. Also a proper amount to be paid by respondent to the complainant's Solicitors of record for their services in said cause, and make a report of her findings, together with the testimony. All other matters are held for further orders and decrees of this Court.

Done this 31st day of July, 1957.



Judge

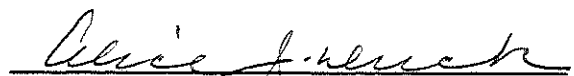
MARQUIAN HOLLOWAY PAUL
Complainant
VS
EARNEST RICHMAN PAUL
Respondent

IN CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO: ERNEST RICHMAN PAUL, RESPONDENT

You are hereby notified that on the 13 day of Aug 1957, at 2:00 O'clock P.M., at the office of the Register, I shall proceed to execute ~~xxx~~ the reference, as ordered and directed by the decree rendered in the above cause, at which time and place you are required to attend

Witness my hand this 31st day of July, 1957.



Register.

Executed by serving a copy of the within on Earnest Richman Paul, Respondent, on this the 31st day of July, 1957.

Sheriff of Baldwin County, Ala.

4036

Received 1 day of Aug 1957

and on _____ day of _____ 19____

I served a copy of the within Process

in Earnest Richard Paul

by service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

Marquian J. Paul

vs.

Earnest R. Paul

FILED

AUG 1 1957

ALICE J. DUCK, Register