

The State of Alabama,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity.)

Pearl L. Clark

Complainant.

VS.

Charles T. Clark

Respondent.

T W Richerson

I

as Register and Commissioner

have called and caused to come before me Pearl L. Clark, Charles Thomas Clark Jr
and Elizabeth Mayo

witnesses named in the Requirement for Oral Examination, on the 18 day of Feby. 1926
192, at the office of

in Alabama, and having first sworn said witness to speak the
truth, the whole truth, and nothing but the truth, the said Pearl L. Clark

doth depose and say as follows:

My name is Pearl L. Clark. I am the complainant in the divorce suit
pending in this court against Charles T. Clark, both of us are over
the age of 21 years and are now and have been for more than three
years next immediately preceding the filing of the complaint in this
cause bona fide residents of Baldwin County, Alabama, residing at
Bay Minette, Alabama. I was married to Charles T. Clark during the
year 1911 and lived with him as his wife until December, 1923, when
I was compelled to leave him on account of his cruel treatment. He
committed actual violence on my person by striking me with his fist
in the face. Just before that he slapped me several times. He has
cursed me and abused me besides beating me and has often threatened
to beat me up or strike me. By reason of his conduct and knowing his
uncontrollable temper I was afraid to live with him any longer and
feared danger from him to my life or health. Since being compelled
to leave him I have supported myself and my little son Charles T.
Clark Jr., now 13 years of age. He also works to help support me
and himself. I am dependent upon my own efforts and that of my little
son for my support. Charles T. Clark is not a fit and proper person
to have the custody and control of my little boy, Charles T. Clark,
Jr. I am afraid to go near him on account of his threats and on

ORAL EXAMINATION.

I, J. W. Reiskin, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness u and read over to them and they signed the same in the presense of myself And I am F. S. Stone, Atty for Complainant at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness u or had proof made before me of the identity of said witness u; that I am not of counsel or of 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 18th day of February 1926

J. W. Reiskin (L. S.)

NO. 649 PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Paul J. Clark

vs. Complainant

Clement J. Clark

Respondent.

Oral Deposition

Filed February 18th, 1926

J. W. Reiskin Register.

Recorded in

Record

Vol. Page

, Register

5
No. 629

The State of Alabama

Baldwin County

Circuit Court in Equity

Paul L. Clark

Complainant

vs.

Chas. J. Clark

Respondent

NOTE OF TESTIMONY

Filed 18th day of Feb., 1926

J. W. Williams Register

Record _____ Page _____

NOTE OF TESTIMONY

The State of Alabama,

PEARL L CLARK

Complainant

Vs.

CHARLES T CLARK

Respondent

No. 529.

In Circuit Court,

In Equity

IN THIS CAUSE comes the Complainant Pearl L Clark

by her solicitor and submits the same for Final

decree upon the Original Bill and exhibits thereto

, and upon the following testimony, to-wit:

Bill and Answer -- Testimony of Complainant and Mrs Elizabeth Mayo and

Charles T Clark Jr.

I hereby certify that the above note of Testimony is correct.

This 18th day of Feby. 1926, 19

J. W. Reamer

Register.

No. 549

THE STATE OF ALABAMA,

BALDWIN COUNTY,

CIRCUIT COURT, IN EQUITY.

BALDWIN COUNTY, ALA.

PEARL L. CLARK

vs.

CHARLES T. CLARK

DECREE OF DIVORCE.

Filed in office this

18th

day of

March, 1926

Register

E. O. M.

RECORDED

The State of Alabama, }
Baldwin County.

No. 549 CIRCUIT COURT, IN EQUITY

PEARL L CLARK

Complainant

vs.

CHARLES T CLARK

Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the testimony as noted by the Register; and, upon consideration thereof, the Court is of 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 the Complainant is forever divorced from the Defendant.

AND IS AWARDED THE CUSTODY AND CONTROL OF THE MINOR CHILD CHARLES T CLARK JR

~~AND THE COMPLAINANT IS PERMITTED TO REMARRY UPON PAYMENT OF THE COSTS OF THIS PROCEEDING~~

It is further ordered, that the said PEARL L CLARK

be, and IS he is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said PEARL L CLARK pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found," then execution for such costs may issue against the said PEARL L CLARK

It is further ordered, adjudged and decreed that said PEARL T CLARK shall not again marry except to said CHARLES T CLARK until sixty days after this date, and that if an appeal is taken within sixty days s he shall not marry again except to said CHARLES T CLARK during the pendency of said appeal

This 18th day of Feby. 1926 192

John D. Lugh
Judge of the Circuit Court of Baldwin County.

THE STATE OF ALABAMA, }
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

I, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the day of 192, in the cause of Complainant

vs.

Defendant

as appears of record in said Court.

Witness my hand and the seal of said Court, this the day of 192

Register.

plainant be again permitted to contract the marriage relation should she so desire.

In duty bound, she will ever pray etc.,

Pearl L. Clark
Complainant.

Stone & Stone
Stone & Stone,
Solicitors for Complainant.

FOOTNOTE:

The Defendant, Charles T. Clark is required to answer each and every paragraph of the foregoing Bill of Complaint from First to Third both inclusive, but answer under oath is hereby expressly waived.

Stone & Stone
Stone & Stone,
Solicitors for Complainant.

IN THE CIRCUIT COURT,
EQUITY SIDE,
STATE OF ALABAMA, BALDWIN
COUNTY.

TO THE HONORABLE, THE CIRCUIT COURT, EQUITY SIDE, STATE
OF ALABAMA, BALDWIN COUNTY, AND THE HONORABLE JOHN
D. LEIGH, JUDGE THEREOF, SITTING IN EQUITY:

Comes your Complainant, Pearl L. Clark, and exhibits this, her Bill of Complaint for divorce against the Defendant, Charles T. Clark, and for ground thereof shows unto your Honor and unto this Court as follows:-

FIRST: That both your Complainant and the Defendant are over the age of twenty-one years and are bona fide residents of Bay Minette, Alabama, where they have resided for more than ten years past.

SECOND: That your Complainant and the Defendant were heretofore duly married during the year 1911 and lived together as man and wife until to-wit: about two years ago when, on account of the matters hereinafter shown, your Complainant was compelled to live separate and apart from the Respondent.

THIRD: That the Respondent has committed actual violence on Complainant attended with danger to life or health; that his conduct has been such that she has had reason to apprehend the commission of actual violence on her person attended with danger to life or health; that he has threatened to strike; that he has abused her; and that he has struck your Complainant.

PRAYER FOR PROCESS AND RELIEF:

THE PREMISES CONSIDERED, the Complainant prays that your Honor will issue or cause to be issued all notices and subpoenas necessary to make the said Charles T. Clark party Defendant, requiring him to appear and plea, answer or demur within the time required by law under pains and penalties of this Honorable Court.

That upon the final hearing of this cause, that your Honor will render adjudged and decreed that the bonds of matrimony heretofore existing between your Complainant, Pearl L. Clark and the Defendant, Charles T. Clark, be forever dissolved and that your Com-

Original 2

Serve on _____

Circuit Court of Baldwin County
In Equity

SUMMONS

vs. L. Clark,

vs.

Charles T. Clark

Stone & Stone .

Solicitor for Complainant.

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this

day of

1925

Sheriff.

Executed this

day of

1925

by leaving a copy of the within summons with

Defendant.

Sheriff.

By

Deputy Sheriff.

GO OUT &
in no way
sing for

WIT

M. B. - V.

The State of Alabama }

BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Charles T. Clark

of Baldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Pearl L. Clark,

against said

Charles T. Clark,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 16th day of December,

192 5.

T. W. Richerson
Register.

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

PEARL L. CLARK
Complainant.

-vs-

CHARLES T. CLARK.
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

Comes the defendant and denies each and every allegation contained
in the bill of complaint filed against him and demands strict proof thereof.

C. T. Clark Deft.

Class 88 Class

Answer

Filed Dec 18/925.
T. W. Beaman
Register

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTG CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. In Vacation Term, 192

PEARL K CLARK , Complainant

VS.

CHARLES T CLARK , Defendant

To T W Richerson , Register :

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by Stone & Stone

..... Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

STONE & STONE

Frank W. Stone
Solicitor for Complainant.

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Pearl F. Clark

VS.

Wm. F. Clark

REQUEST FOR DECREE IN
VACATION

FILED

Feb 18

1926

J. W. McIlwain

Register

RECORDED IN _____ RECORD

VOL. _____ PAGE _____

Register