IN ACCOUNT WITH

# BALDWIN COUNTY BANK

BAY MINETTE, ALABAMA

ADA C. WAMBLE GDN. OF JAMES C. WAMBLE
% JOHN CHASON
BAY MINETTE, ALA.

| CHECKS | | DEPOSITS | DATE | | BALANCE |
|---|---|---|---|---|---|
| AMOUNT BROUGHT FORWARD | | 3,433.50+ | JUN 16 '59 | | 3,433.50* |
| 45.40- | | | JUN 23 '59 | 1 | 3,388.10* |
| 45.40+EC | 45.50- | | JUN 23 '59 | 1 | 3,388.00* |
| 36.00- | | | JUN 29 '59 | 2 | 3,352.00* |
| 300.00- | | | JUN 30 '59 | 3 | 3,052.00* |
| 300.00- | | | JUL 3 '59 | 4 | 2,752.00* |
| 2,638.65- | | | JUL 6 '59 | 5 | 113.35* |
| 50.00- | | | JUL 11 '59 | 6 | 63.35* |
| | | 106.00+ | JUL 14 '59 | 6 | 169.35* |
| | | 181.00+ | AUG 7 '59 | 6 | 350.35* |
| | | 106.00+ | SEP 8 '59 | 6 | 456.35* |
| 64.00- | | | SEP 14 '59 | 7 | 392.35* |
| | | 106.00+ | OCT 17 '59 | 7 | 498.35* |
| 152.00- | | | OCT 26 '59 | 8 | 346.35* |

PLEASE EXAMINE THIS STATEMENT AT ONCE AND REPORT ANY ERROR. IF NO ERROR IS REPORTED IN TEN DAYS THE ACCOUNT WILL BE CONSIDERED CORRECT ALL ITEMS INCLUDING CHECKS ON US ARE CREDITED SUBJECT TO FINAL PAYMENT.

THE LAST AMOUNT IN THIS COLUMN IS YOUR BALANCE

4586

**USE THIS FORM TO BALANCE YOUR CHECKBOOK RECORDS WITH THE BANK STATEMENT**

| | CHECKS OUTSTANDING | | | | | | | RECONCILEMENT FORM | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Description Ck.# / Date | AMOUNT ($) | | | Description Ck.# / Date | AMOUNT ($) | | | Balance Shown By Statement at close of Period ( / / ) .... $ | | | |
| | | | | TOTAL brought forward | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | Add Deposits and other Credits made AFTER close of Period ..... $ | | | |
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| | | | | | | | | TOTAL ..... $ | | | |
| | | | | | | | | DEDUCT Total CHECKS OUTSTANDING. . . .$ | | | |
| TOTAL or carried forward | | | | TOTAL | | | | YOUR CHECKBOOK should show THIS LATEST BALANCE $ | | | |

***WHEN BETTER SERVICE IS POSSIBLE – WE WILL PROVIDE IT***

(458)

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

# The State of Alabama, Baldwin County

## CIRCUIT COURT, IN EQUITY

EDITH PAUL, Complainant

vs.

EDGAR L. PAUL, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso or~~ WAIVER AND ANSWER & AGREEMENT 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 EDITH PAUL is forever divorced from the said EDGAR L. PAUL ~~forever on account of~~

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the written agreement with regard to the custody and control of the minor children of this marriage entered into between the parties on the 29th day of May, 1959, and submitted to the Court for its approval, be, and it is hereby approved, and it is, by reference, made a part hereof as though fully set out herein, and both parties are hereby enjoined to keep, and abide by, the terms of said agreement.

It is futher 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 futher 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 futher ordered that EDITH PAUL the Complainant pay the cost herein to be taxed, for which executed may issue.

This 1st day of June 1959

Hubert M. Hall

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.



LITHO IN U.S.A.

No._____ Page_____

THE STATE OF ALABAMA

BALDWIN COUNTY

In Circuit Court, In Equity

_____

_____

Complainant

vs.

_____

_____

Respondent

# DIVORCE DECREE

Demand for Oral Examination. MOORE PRINTING CO., BAY MINETTE, ALA.

# The State of Alabama,
Baldwin County

EDITH PAUL

Complainant

VS.

EDGAR L. PAUL

Defendant

## CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

**In Equity.**

The complainant requests the oral examination of the following named witnesses, on behalf of the complainant - viz:

EDITH PAUL

said witnesses reside in the County of BALDWIN State of Alabama.

ALICE COX who resides at Bay Minette, Alabama or, The Register of this Court is suggested as a suitable person to be appointed Commissioner to take the deposition of said witness on such oral examination.

Jeffery J. Maddox

Solicitor for Complainant

CIRCUIT COURT OF
Baldwin County, Alabama

IN EQUITY

EDITH PAUL

Complainant

vs.

EDGAR PAUL

Defendant

DEMAND FOR ORAL EXAMINATION

FILED

Filed JUN 1 1959 19

ALICE J. DUCK, CLERK REGISTER

Register.

COMMISSION TO TAKE DEPOSITIONS B.T.-2-49-200

**THE STATE OF ALABAMA**
**Baldwin County**

**Circuit Court**

TO: ALICE COX

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine EDITH PAUL

as witnesses in behalf of EDITH PAUL in a cause pending in our Circuit Court in Baldwin County, of said State, wherein EDITH PAUL

is the , Complainant

and EDGAR L. PAUL

is the Respondent

on oath, to be by you administered, upon her

to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 29th day of May, 1959.

Alice J. Duck
Register.

Commissioner's Fee, $

Witness' Fees, $

No._____

# THE STATE OF ALABAMA
## Baldwin County

## CIRCUIT COURT

EDITH PAUL

Complainant

VS.

EDGAR PAUL

Defendant

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER:

WITNESSES:

FILED

JUN 1 1959

ALICE L. BUCK, CLERK
REGISTER

ORAL DEPOSITION

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

EDITH PAUL
COMPLAINANT

vs.

EDGAR L. PAUL
RESPONDENT

I, ALICE COX

as ~~Register and~~ Commissioner

have called and caused to come before me EDITH PAUL

witness named in the requirement for Oral Examination, on the 29th day of May

1959, at the office of TELFAIR J. MASHBURN, Esq.,

in Bay Minette, Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said EDITH PAUL

doth depose and say as follows: "My name is EDITH PAUL. I am the complainant in this cause and I am over the age of twenty-one years. The respondent, EDGAR L. PAUL, is over the age of twenty-one years and is a resident citizen of Baldwin County, Alabama, residing near Bay Minette, Alabama. We were lawfully married in Bay Minette, Alabama, on the 13th day of March, 1948. I lived with the respondent as his wife until about the 15th day of April, 1958. On or about the 15th day of April, 1958, the respondent left me and has not since that time returned to live with me as his wife, nor has he in any way contributed to my support during that time. We have two children, as a result of this union, RANDALL E. PAUL, age eight years, and RICKEY D. PAUL, age ~~six~~ years. We have entered into a written agreement, a copy of which is submitted herewith for the approval of the Court, with regard to the custody and control of said children. If the Court approves of the agreement between me and my husband, I respectfully request that the Court incorporate said agreement in its decree in this cause. I am convinced that I shall never again beable to live with the respondent as his wife." Further deponent says not.

x Edith L. Paul

ORAL EXAMINATION

I, ALICE COX 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 and read over to her and she signed the same in the presence of myself and Telfair J. Mashburn, Esq.,

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness or had proof made before me of the identity of said witness ; 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 29th day of May , 1959 .

Alice Cox (L. S.)

No. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

EDITH PAUL
COMPLAINANT

vs.

L.
EDGAR/PAUL

RESPONDENT

ORAL DEPOSITION

Filed , 19

, Register.

RECORDED IN

FILED

Record

Vol. JUN 1 1959 Page

ALICE J. DUCK, CLERK ~~REGISTER~~

, Register.

8581—NOTE OF TESTIMONY

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

EDITH PAUL

vs.

EDGAR L. 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, Waiver and Answer of the Respondent, and Testimony of EDITH PAUL, and Separation Agreement between the Parties.

and in behalf of Defendant upon Waiver and Answer and Separation Agreement.

Alice J. Mack
Register.

Delfair J. Marlsbury

No.

# THE STATE OF ALABAMA
## Baldwin County

IN EQUITY

Circuit Court of Baldwin County

EDITH PAUL

VS.

EDGAR PAUL

# Note of Testimony

Filed in Open Court this

FILED

day of , 19

JUN 1 - 59

Register.

ALICE J. DUCK CLERK REGISTER

MOORE PRINTING CO., BAY MINETTE, ALA.

SEPARATION AGREEMENT

THIS AGREEMENT, Made and entered into on this the 29th day of May, 1959, by and between EDITH PAUL, hereinafter referred to as the party of the first part, and EDGAR L. PAUL, hereinafter referred to as the party of the second part:

WITNESSETH:

WHEREAS, the parties hereto have been husband and wife for a period of more than eleven years, and as a result of said union have two children, RANDALL E. PAUL, age eight years, and RICKEY D. PAUL, age ~~two~~ six years; and,

WHEREAS, the parties hereto have been separated for more than twelve months and have definitely concluded that under conditions now existing it is impracticable for them to live together as man and wife.

NOW, THEREFORE, IN CONSIDERATION THEREOF, and of the mutual agreements hereinafter made, they have mutually agreed to a complete separation under the following express terms and conditions:

1. The said parties shall continue to live separate and apart, and neither party hereafter shall in any way harass, threaten, intimidate, or otherwise act in any way so as to embarrass or humiliate the other party.

2. The party of the first part shall have the custody and control of the children, RANDALL E. PAUL AND RICKEY D. PAUL, FOR nine months of each year, beginning, on or about, the 1st day of September, or when schools open, of each year, and expiring, on or about, the 1st day of June, or when schools close, of each year; and the party of the second part shall have the custody and control of said children for three months of each year, beginning, on or about, the 1st day of June of each year, or when schools have closed, and expiring on or about the 1st day of September of each year, the care and custody of the party of the second part of said children being expressly contingent upon his having a proper home in which to keep said children. It is understood and agreed, however, during the period of time that the children are in the custody and control of one of said parties, the other party shall have the right at convenient times of access and visitation of the children, such access and visitation to be exercised in a proper and reason-

able manner and at such times as may be convenient to and consented to by the party who has the custody of the said children.

It is understood and agreed that during the time the children are in the custody and control of one of said parties, the other party shall have the right to have the children visit and stay with him at least two week-ends per month, if he desires.

3. It is understood and agreed that the maintenance and support of said children is the joint responsibility of the parties hereto, as long as the party of the first part continues to work and make a reasonable salary; and that, without fixing a definite sum, both parties hereto, will jointly and severally undertake to maintain and support said children with all of the reasonable necessities of life.

4. It is further understood and agreed that, in the event the party of the first part insists on her express determination to file a suit for divorce against the party of the second part, the party of the second part denies and expects to continue to deny that she is in any way entitled to a divorce. However, should the Court decide that the party of the first part is entitled to a divorce, then it is agreed and understood that this agreement shall be submitted to the Court for its approval, and, upon approval by the Court, it shall be incorporated in, and become a part of, the final decree in said cause.

THIS AGREEMENT has been made and executed by the parties hereto on the day and date hereinabove first set forth, in good faith, with full understanding of all of its provisions, and with the mutual promise on the part of each to comply therewith faithfully and completely.

Edith S. Paul (SEAL)

Edgar L. Paul (SEAL)

EXECUTED IN THE PRESENCE OF:

Alice Cox

Alice Cox

Delfair J. Marlborough

FILED

JUN 1 1959

ALICE J. DUCK, CLERK REGISTER

STATE OF ALABAMA, | TO ANY SHERIFF OF THE STATE OF ALABAMA:
COUNTY OF BALDWIN. |

You are hereby commanded to summon EDGAR L. PAUL to appear and demur, plead to or answer within thirty days from the service hereof to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, against EDGAR L. PAUL, by EDITH PAUL.

A copy of the bill of complaint is hereto attached.

WITNESS my hand this the 23 day of May, 1959.

Alice J. Buck
REGISTER

**************************************

| | |
|---|---|
| EDITH PAUL, | IN THE CIRCUIT COURT OF |
| Complainant, | BALDWIN COUNTY, ALABAMA. |
| VS. | IN EQUITY. NO. _____ |
| EDGAR L. PAUL, | |
| Respondent. | |

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

Your complainant, EDITH PAUL, respectfully represents unto your Honor as follows:

1. That your complainant is over the age of twenty-one years and is a bona fide resident citizen of said State and County and has been for more than the last past two years; that the respondent, EDGAR L. PAUL, is over the age of twenty-one years and resides in said State and County, living about three miles North of Bay Minette, on the Stockton Highway;

2. That your complainant and the respondent were lawfully married, on or about, to-wit: the 13th day of March, 1948, in Bay Minette, Alabama; and that they lived together as husband and wife in Baldwin County, Alabama, until, to-wit: the 15th day of April, 1958;

3. That the said respondent voluntarily abandoned the bed and board of complainant more than one year next preceding the filing of this bill of complaint, since which time complainant and respondent have not lived together nor in any way recognized each other as husband and wife;

4. That there was born to the marriage between your complainant

and the respondent two children, RANDALL E. PAUL, age eight years, and RICKEY D. PAUL, age two years; that your complainant is a fit and proper person to have the care, custody and control of said children; and that the respondent is not a fit and proper person to have the care, custody and control of said children; and that it would be to the best interest of said children to remain in the care, custody and control of said complainant, where they have been since the separation of your complainant and the respondent;

5. That the respondent is well, strong and able-bodied and has a good job with the Chemstrand Corporation, where he earns more than $350.00 per month; that he is well able to support his said children; and that, while your complainant does work, she is not able to earn enough to support herself and the children;

6. That your complainant is not able to pay her Solicitor for his services rendered and to be rendered in this cause, because it has taken all that she could earn to support herself and her children over the last past twelve months, and that she has employed Telfair J. Mashburn, Esq., as her Solicitor in this cause.

7. That since their separation, the respondent has contributed less than $500.00 toward the support and maintenance of your complainant and their children.

PRAYER FOR PROCESS

WHEREFORE, THE PREMISES CONSIDERED, Your complainant makes the said EDGAR L. PAUL a party respondent to this her bill of complaint, and, in order that complainant may have the relief hereinafter prayed for, may it please your Honor to cause the State's Writ of Subpoena to be issued, directed to the said EDGAR L. PAUL, commanding him to plead, answer or demur to this bill of complaint within the time required by law.

PRAYER FOR RELIEF

Your complainant prays that on a final hearing of this cause, your Honor will make and enter a decree granting her the following separate and several relief:

1. Forever divorcing her from said respondent;

2. Giving her the care, cusotdy and control of their minor children, named in paragraph 4 of this bill of complaint;

3. Fixing a reasonable sum for the respondent to pay to your

complainant monthly, or every fifteen days, as alimony and for the support and maintenance of their minor children.

4. Fixing a reasonable sum for the respondent to pay to complainant's Solicitor, Telfair J. Mashburn, for his service in this cause.

And if your complainant be mistaken in the relief to which she is entitled, then she prays for such other, further, different or general relief as in equity and good conscience she may be entitled to receive, and, as in duty bound, she will ever pray, etc.

FILED
MAY 23 1959
ALICE J. DUCK, Register

Telfair J. Mashburn
SOLICITOR FOR COMPLAINANT

Served May 27, 1959
~~[illegible]~~
W. A. Tolbert, D.S.
Gaylon Wilkins, Sheriff

| | |
|---|---|
| EDITH PAUL,<br>Complainant,<br>VS.<br>EDGAR PAUL,<br>Respondent, | IN THE CIRCUIT COURT OF<br>BALDWIN COUNTY, ALABAMA.<br>IN EQUITY. NO._____. |

Comes the respondent in the above-styled cause and accepts service of a bill of complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause and consents that the same may be taken and the cause submitted for final decree.

And for answer to the bill of complaint heretofore filed in this cause, respondent says:

1. He admits the allegations contained in paragraph 1 of said bill of complaint.

2. He admits the allegations contained in paragraph 2 of said bill of complaint.

3. He denies each and every allegation contained in paragraph 3 of said bill of complaint and demands strict proof thereof.

4. He admits the allegations contained in paragraph 4 of said bill of complaint.

5. He denies each and every allegation contained in paragraph 5 of said bill of complaint.

6. He denies each and every allegation contained in paragraph 6.of said bill of complaint.

7. He denies each and every allegation contained in paragraph 7 of said bill of complaint.

Edgar L. Paul,
RESPONDENT.

Witness:
Alice Cox

FILED
JUN 1 1959
ALICE I. DUCK, CLERK REGISTER