

(4126)

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

MARQUIAN PAUL, Complainant

vs.

RICHMOND PAUL, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Personal Service 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

MARQUIAN PAUL is forever divorced from the said RICHMOND PAUL for and on account of

CRUELTY. IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that custody of the two minor children of this marriage, namely, Patricia Jean Paul, 10 years of age, and James Maxwell Paul, 8 years of age, be and the same is hereby reposed in the Complainant, and that she be paid for their support and maintenance by the Respondent, the sum of Thirty Dollars (\$30.00) per month, and that the Respondent be granted rights of reasonable visitation.

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 RICHMOND PAUL the Respondent pay the cost herein to be taxed, for which executed may issue.

This 26 day of February 1966

[Signature] 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.

*M*

No. \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED  
FEB 26 1950  
ALICE J. DICKINSON  
CLERK  
REGISTER

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

MARQUIAN PAUL

Complainant

vs.

RICHMOND PAUL

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Personal Service 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 MARQUIAN PAUL is forever divorced from the said RICHMOND PAUL for and on account of

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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.

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

This day of 19

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. \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,  
Baldwin County.

Circuit Court, Baldwin County

No. ....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

*Richmond 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

*Richmond Paul*

, Defendant

by *Marguerite Paul*

, Plaintiff

Witness my hand this 9 day of Oct 1959

*Archie J. Duck*

Clerk

No. \_\_\_\_\_ Page \_\_\_\_\_

The State of Alabama  
Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed \_\_\_\_\_ 19\_\_\_\_

\_\_\_\_\_ Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

\_\_\_\_\_ 19\_\_\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this \_\_\_\_\_ 19\_\_\_\_

by leaving a copy with

\_\_\_\_\_ Sheriff

\_\_\_\_\_ Deputy Sheriff

MARQUIAN PAUL,	)	
Complainant,	)	IN THE CIRCUIT COURT OF
-vs-	)	BALDWIN COUNTY, ALABAMA
RICHMOND PAUL,	)	IN EQUITY
Respondent.	)	

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA, Sitting in Equity:-

Comes your Complainant, Marquian Paul, in the above styled cause, and files this her Bill of Complaint for divorce against the Respondent, 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 five (5) years. That Richmond Paul is over the age of twenty-one years and a resident citizen of Baldwin County, Alabama, also having been a resident citizen for more than five (5) years.

2. That the Complainant and Respondent were lawfully married on, to-wit, JULY 17, 1948, but because of the matters and facts hereinafter complained of, have lived separate and apart for over four (4) years.

3. Complainant further aversthat the Respondent has committed actual violence on her person attended with danger to her life and health, by striking her with his fists, and committing other acts of violence upon her, and from his conduct toward her, she is reasonably apprehensive of other and further violence, so much so that approximately four (4) years ago she felt it impossible to longer live with the Respondent, and further, 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, should she continue to be his wife.

4. Complainant further shows that the Respondent has, after

their marriage, become addicted to habitual drunkenness, which habit continues to this date.

5. Complainant further shows that there was born of this marriage two (2) children, namely, Patricia Jean Paul, 10 years of age, and James Maxwell Paul, 8 years of age, who are in the care, custody and control of the Complainant, and have been in her care, custody and control for the period of more than four (4) years since her separation from the Respondent.

6. Complainant further shows unto the Court that the Respondent is an able bodied man, and is gainfully employed, and is or should be financially able to furnish support and maintenance to the minor children of this marriage.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that Richmond Paul be made a party defendant to this cause by the usual process of this Honorable Court, requiring him to plead, answer or demur within the time and under the penalties 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 said minor children as to the Court seems 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.

*Filed*  
*10-9-59*

*Ex-10-20-59*

  
Solicitor for Complainant



THE STATE OF ALABAMA, }  
Baldwin County

No. \_\_\_\_\_ Circuit Court, In Equity.

MARQUIAN PAUL

Complainant\_\_\_

Vs.

RICHMOND PAUL

Defendant....

Motion is hereby made for a Decree Pro Confesso against RICHMOND PAUL

Defendant.....

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant ....; and that said summons was duly served according to law, and that said Defendant ... ha s failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 24 day of February 19 68



Solicitor.

No. \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court, In Equity

MARQUAN PAUL

Vs.

RICHMOND PAUL

Motion for Decree Pro Confesso on  
Personal Service

Filed 7-24 19 60

*Alvin J. Muck*  
Register.

Recorded in \_\_\_\_\_ Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

MARQUIAN PAUL  
 Complainant,  
 Vs.  
RICHMOND PAUL  
 Respondent.

In the Circuit Court.  
 In Equity No. \_\_\_\_\_

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent \_\_\_\_\_

RICHMOND PAUL

by the Sheriff of Baldwin County, on the \_\_\_\_\_ day of \_\_\_\_\_

194\_\_\_\_\_

And it further appears to the Register, that that the said \_\_\_\_\_

RICHMOND PAUL

\_\_\_\_\_ the Respondent, having to the date hereof,

failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,

on motion of C. G. CHASON Solicitors

for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,

and it hereby is, in all things taken as confessed against the said \_\_\_\_\_

RICHMOND PAUL

This 24 day of Feb, 1940

  
 \_\_\_\_\_  
 Register.

No. 4726

CIRCUIT COURT OF  
BALDWIN COUNTY,  
ALABAMA.  
IN EQUITY

MARQUIAN PAUL

Complainant,

Vs.

RICHMOND PAUL

Respondent.

DECREE PRO CONFESSO ON  
PERSONAL SERVICE.

Issued this \_\_\_\_\_ day of \_\_\_\_\_  
194\_\_\_\_\_.

Register.

MARQUIAN PAUL

vs.

RICHMOND PAUL

THE STATE OF ALABAMA  
Baldwin County

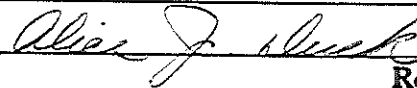
IN EQUITY  
Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,  
Motion for Decree Pro Confesso on Personal Service, Decree Pro  
Confesso on Personal Service and Testimony of Marquian Paul and  
Louise Norris

and in behalf of Defendant upon



Solicitor for Complainant



Register.

M

No. -----

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

**IN EQUITY**  
**Circuit Court of Baldwin County**

MARQUIAN PAUL

VS.

RICHMOND PAUL

**Note of Testimony**

Filed in Open Court this -----

day of -----, 19-----

Register.

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

MARQUIAN PAUL

COMPLAINANT

vs.

RICHMOND PAUL

RESPONDENT

I, Frances G. Mallory

as Register and Commissioner in Chancery

have called and caused to come before me Marquian Paul and Louise Norris

witnesses named in the requirement for Oral Examination, on the 26th day of February  
1960, at the office of C. G. Chason

in Foley, Alabama, and having first sworn said witnesses to speak the

truth, the whole truth, and nothing but the truth, the said Marquian Paul and

doth depose and say as follows:

Testimony of Marquian Paul:

My name is Marquian Paul. I am over the age of twenty-one years and a bona fide resident citizen of Baldwin County, Alabama, having been such a resident citizen for more than five years. Richmond Paul is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama, and has been for more than five years. We were married on July 17, 1948, and have lived separate and apart for over four (4) years. On many occasions prior to our separation, he beat me with his fist and belts, doing actual violence on my person attended with danger to my life and health, to such an extent that it was impossible for me to live with him. He has also made numerous threats of doing me other and further violence attended with danger to my life or health, and I am convinced that he would have done so had I continued to live with him. He also has, since marriage, become addicted to habitual drunkenness, which habit continues to this date. There was born of this marriage two children, namely, Patricia Jean Paul, 10 years of age, and James Maxwell Paul, who is 8 years of age. These children are in my care and custody, and have been with me since my separation. I am a fit and proper person to have their custody reposed in me, which I believe to be to their best interest. Richmond Paul is regularly employed and I am informed that he makes a salary of \$35.00 per week, plus tips, that his room, board and uniforms are furnished, which I consider to be equal to a salary of \$65.00 to \$75.00 per week. I believe him to be financially able to pay to me a sum for support and maintenance of the minor children.

Signed: Marquian Paul

ORAL EXAMINATION

I, Frances G. Mallory 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 es and read over to them and they signed the same in the presence of myself and C. G. Chason

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof made before me of the identity of said witness es ; 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 26th day of February, 19 60 .

*Frances G. Mallory*

No. \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

MARQUIAN PAUL

COMPLAINANT

vs.

RICHMOND PAUL

RESPONDENT

ORAL DEPOSITION

FILED

Filed Feb 26, 1960, 19

MADE A TRUE COPY  
RECORDED IN

Register.  
Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.



COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: FRANCES G. MALLORY

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 Marquian Paul and Louise Norris

a witness in behalf of Marquian Paul in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein

Marquian Paul

, Complainant

and

Richmond Paul

Respondent

on oath, to be by you administered, upon them  
to take and certify the depositions of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 25th day of

February

, 195 60

*Alice J. Luck*  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

MARQUIAN PAUL

VS. Complainant

RICHMOND PAUL

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

CECIL G. CHASON

ATTORNEY-AT-LAW  
FOLEY, ALABAMA

February 23, 1960

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

Dear Mrs. Duck:

Enclosed herewith is Motion for Decree Pro Confesso on  
Personal Service, and a suggested Decree on Personal  
Service.

I do not seem to have my card showing date of service in  
my file, however, am informed by Carlisle Childress,  
Deputy Sheriff, that it was served several months ago.

Please verify, and if this is correct, issue the Decree  
Pro Confesso.

Yours very truly,

  
C. G. Chason

CGC:fm

encls. 2

CECIL G. CHASON

ATTORNEY-AT-LAW  
FOLEY, ALABAMA

March 3, 1958

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

Dear Mrs. Duck:

I am enclosing herewith an Amended Bill of Complaint in the Divorce action of Marquian Paul -vs- Richmond Paul.

The original Complaint was filed by Mr. Epperson, however, he now informs me that he is no longer handling her case, and therefore, was perfectly agreeable to my entering this matter as her attorney.

I understand that there is some question as to whether the original service was properly made, therefore, have a copy of this Amended Complaint served on Richmond Paul by the Sheriff, rather than sending the copy to his attorney.

Yours very truly,



C. G. Chason

CGC:fm

encls. 2

cc: Hon. H. M. Hall  
Circuit Judge  
Bay Minette, Alabama

cc: Mr. Arthur Epperson  
Attorney at Law  
Foley, Alabama