

294

GUDRUN E. ANDERSON,  
Complainant,  
VS.  
PAUL C. ANDERSON,  
Respondent.

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

MOTION FOR DECREE PRO CONFESSO.

Motion is hereby made for a Decree Pro Confesso against the Respondent, Paul C. Anderson, on the ground that a copy of the Bill of Complaint in this cause, together with a summons, was mailed to the Respondent by registered mail, postage prepaid, marked "For Delivery Only to the Person to Whom Addressed. Return Receipt Requested," and more than thirty days have elapsed since the return receipt was received and filed by the Register of this Court, and that he has failed to plead, answer or demur to the Bill of Complaint to the date hereof.

Dated this 8th day of March, 1937.

  
Solicitor for Complainant.

A N S W E R

GUDRUN E. ANDERSON,

Complainant

vs.

PAUL C. ANDERSON,

Respondent.

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

ANSWER OF HENRY WILSON

In the Circuit Court of Baldwin County, Alabama  
in Equity.

Separate answer of HENRY WILSON, one of the  
Garnishees in the Bill of Complaint as above entitled.

Said Garnishee, answering said Garnishment, says:

The said Garnishee, Henry Wilson, denies that he  
is indebted to the said respondent at the time of the service  
of this writ of Garnishment, and further that he will not be  
indebted to the said respondent in the future, by any contract  
now existing, and further that he has not under his possession  
or control any personal, real or thing in action, or property  
of any kind nature or description, which belongs to the said  
Respondent, Paul C. ANDERSON.

Your Garnishee, Henry Wilson, shows unto your  
Honor, that he is indebted to the Silverhill Motor Co. of  
Silverhill, Alabama, in the amount of Thirty-Six Dollars and  
35/100 (\$36.35) ~~the amount shown by the records~~  
of the Silverhill Motor Company; this debt was made between  
your Garnishee and the Respondent in this action, Paul C.  
Anderson, who was then the manager of the Silverhill Motor  
Company and whether or not your Garnishee is indebted to the  
Respondent, Paul C. Anderson or the Silverhill Motor Company  
and who compose this Company he does not know but he is  
indebted to the Silverhill Motor Company in the amount stated  
above.

Your Garnishee, Henry Wilson, is ready and willing  
to comply with any order of the Court, and desires that the  
Court determine to whom this money is owned and to whom it should  
be paid and further shows that his only interest in this cause  
is to protect himself in the premises and asks that this  
Honorable Court allow his costs and a reasonable solicitor's  
fee for the making of this answer and protection of his interest  
herein.

Henry Wilson  
Garnishee.  
Orvis M. Brown  
Solicitor for Henry Wilson

State of Alabama  
Baldwin County.

Personally appeared before me Orvis M. Brown, a  
Notary Public, in and for said County and State, one Henry  
Wilson, who being first duly sworn doth depose and sayeth, that  
the statements as given in the above answer, are the truths, the  
whole truth and nothing but the truth. Sworn to and subscribed to  
before me this 26th day of March, 1937.

GUDRUN E. ANDERSON,

Complainant,

VS.

PAUL C. ANDERSON,

Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY. NO. \_\_\_\_.

ORDER OF REFERENCE.

This matter coming on to be heard on the Bill of Complaint and Answer of the Respondent, and the same having been considered by the Court, it is therefore ORDERED, ADJUDGED AND DECREED by the Court as follows:

1. That this cause and matter be, and the same is hereby referred to the Register of this Court with direction that he hold a reference as provided by law and at said reference he shall hear testimony, ascertain and report to this Court:

(a). What is a reasonable amount to be allowed Complainant as alimony pendente lite.

(b). What is a reasonable amount to allow her attorney for services rendered in this cause.

(c). What is a reasonable amount to be allowed her as permanent alimony.

All other matters are reserved for further and future consideration by the Court.

Dated this 12th day of April, 1937.

*J. W. Hare*

Judge.

GUDRUN E. ANDERSON,  
Complainant,  
VS.  
PAUL C. ANDERSON,  
Respondent.

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

SHERIFF'S GARNISHMENT ON ATTACHMENT.

TO H. EDHEGARD, CHARLES SEIGLER, O. E. F. WINDBERG, HENRY WILSON,  
F. VASCO, BERT SANDELL, JOE DVORACK AND G. HOFF:

WHEREAS, a suit has been commenced by the said Complainant against the said Respondent, in the Circuit Court of Baldwin County, Alabama, in Equity, in which an Equitable Attachment was issued returnable as required by law, which said attachment has been placed in the hands of the undersigned, M.H. Wilkins, Sheriff of Baldwin County, Alabama, for the due execution thereof.

THESE PRESENTS are, therefore, to command you and each of you to personally be and appear before the said Circuit Court to be holden for said County within thirty days from receipt of this writ, then and there to answer on oath, whether you are indebted to said Respondent at the time of the service of this Writ of Garnishment, or at the time of making your answer, and whether you will not be indebted in future to said Respondent, Paul C. Anderson, by a contract now existing, and whether you have in your possession or under your control personal or real property, or things in action, belonging to said Respondent, Paul C. Anderson.

IN WITNESS WHEREOF, I, the said M. H. Wilkins, as Sheriff of Baldwin County, Alabama, have hereunto set my hand on this the 24th day of February, 1937.

  
\_\_\_\_\_  
Sheriff, Baldwin County, Alabama.

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 **Paul. C Anderson.**

of \_\_\_\_\_ 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

**Gudrun. E Anderson.**

against said **Paul C Anderson.**

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, Robert S. Duck, Register of said Circuit Court, this **25th** day of **January** 193 **7**

*Robert S. Duck* Register

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

**CIRCUIT COURT, BALDWIN COUNTY, ALA.  
IN EQUITY**

No. 294

*Hudson E Anderson*  
VS

PLAINTIFF

*Paul C Anderson*

DEFENDANT

**BILL OF COSTS**

FEES OF REGISTER		Dollars	Cents	Brought Forward .....	
Filing each bill and other papers .....	\$ 10		150	For Receiving, keeping and paying out or distributing money, etc.: 1st \$1,000, 1%, all over \$1,000, and not over \$5,000, 3-4 of 1%; all over \$5,000 and not exceeding \$10,000, 1-2 of 1%, all over \$10,000 1-4 of 1%.	\$1500
Issuing each subpoena .....	50		50	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.	
Issuing each copy thereof .....	40		40	Each notice sent by mail to creditor ...	15
Entering each return thereof .....	15			Filing receipting for and docketing each claim, etc. ....	25
For each order of publication .....	1 00			For all entries on subpoena docket, etc.	50
Issuing Writ of injunction .....	1 50			For all entries on commission docket, etc.	50
For each copy thereof .....	50			Making final record, per 100 words .....	15
Entering each return thereof .....	15			Certified copy of decree .....	1 00
Issuing Writ of Attachment .....	1 00		100	Report of divorce to State Health Office (Acts 1915)	50
Entering each return thereof .....	15		100		
Docketing each case .....	1 00			<b>TOTAL FEES OF REGISTER..</b>	
Entering each appearance .....	25			<b>FEES OF SHERIFF</b>	
Issuing each decree pro confesso on per ser.	1 00			Serving and returning subpoena on deft. \$1 50	
Issuing each decree pro confesso on publica	1 00		100	Serving and returning subpoena for witness .....	65
Each order appointing guardian .....	1 00			Levying attachment .....	1 50
Any other order by Register .....	50		50	Entering and returning same .....	25
Issuing Commission to take testimony .....	50			Selling property attached .....	
Receiving and filing .....	10			Impaneling Jury .....	75
Endorsing each package .....	10		20	Executing Writ of possession .....	2 50
Entering order submitting cause .....	50		20	Collecting execution for costs .....	1 50
Entering any other order of court .....	25		50	Serving and returning sci. fa., each .....	65
Noting all testimony .....	50			Serving and returning notice .....	65
Abstract of cause, etc. ....	1 00			Serving and returning writ of injunction	1 50
Entering each decree .....	75		75	Serving and returning writ of exeat .....	1 50
For every 100 words over 500 .....	15		100	Taking and approving bonds, each .....	75
Taking account, etc. ....	3 00			Collecting money on execution .....	
Taking testimony, etc .....	15			Making Deed .....	2 50
Each report, 500 words or less .....	2 50		250	Serving and returning application, etc. ...	1 00
For every 100 words over 500 .....	15			Serving attachment, contempt of court. ...	1 50
Amount claimed less than \$500, etc .....	2 00			<b>TOTAL FEES OF SHERIFF ..</b>	
Issuing each subpoena .....	25			<b>RECAPITULATION</b>	
Witness certificate, each .....	25			Register's Fees .....	
Issuing execution, each .....	75			Sheriff's Fees .....	
Entering each return .....	15			Commissioner's Fees .....	
Taking and approving bond, each .....	1 00			Solicitor's Fees .....	
Making copy of bill, etc .....	15			Witness Fees .....	
Each notice not otherwise provided for ..	50		50	Guardian Ad Litem .....	
Each certificate or affidavit, with seal ..	50			Printer's Fees .....	
Each certificate or affidavit, no seal ..	25			Trial Tax .....	3 00
Hearing and passing on application, etc. ...	3 00			Recording Decree in Probate Court .....	
Each settlement with Receiver, etc. ...	3 00		1500		
Examining each voucher of Receiver, etc ..	10			<b>TOTAL .....</b>	
Examining each answer, etc. ....	3 00				
Recording resignation, etc .....	75				
Entering each certificate to Supreme Court	50				
Taking questions and answers, etc .....	25				
For all other ser relating to such proceedings	1 00				
For services in proceeding to relieve minors, etc., same fee as in similar cases.					
Commission on sales, etc: 1st \$100, 2 per cent: all over \$100 and not exceeding \$1,000, 1 1-2 per cent; all over \$1,000, and not exceeding \$20,000, 1 per ct; all over 20,000, 1-4 of 1 per cent.					
Sub Total Carried Forward .....					

A N S W E R

GUDRUN E. ANDERSON,  
Complainant,

VS.

PAUL C. ANDERSON,  
RESPONDENT.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY. NO. 294.

ANSWER OF BERT SANDELL:

In The Circuit Court of Baldwin County, Alabama in Equity.

Separate answer of BERT SANDELL, one of the Garnishee's to the Bill of Complaint as above entitled.

Said Garnishee, answering said Garnishment, says:

The said Garnishee, Bert Sandell, denies that he is indebted to the said respondent at the time of the service of this writ of Garnishment, and further that he will not be indebted to the said respondent in the future, by any contract now existing, and further that he has not under his possession or control any personal, real or thing in action, or property of any kind nature or description, which belongs to the said Respondent, Paul C. Anderson.

Your Garnishee, Bert Sandell, shows unto your Honor, that he is indebted to the Silverhill Motor Co. of Silverhill, Alabama, in the amount of Eighty Six Dollars and 65/100 (\$86.65) which is half of the amount shown by the records of the Silverhill Motor Company, as this agreement was made between the manager of the Silverhill Motor Company, who was your Respondent and the said Garnishee, Bert Sandell, and further that this account is not at this time due, but is carried on the books of the said Silverhill Motor Company, from time to time.

Your Garnishee Bert Sandell, is ready and willing to comply with any order of the Court, and further shows that his only interest in this cause is to protect himself in the premises, and ask that this Honorable Court allow his costs and a reasonable solicitor's fee for making this answer and protecting his interests herein.

*Bert Sandell*  
Garnishee.

*Orvis M. Brown*  
Solicitor for Bert Sandell

State of Alabama  
County of Baldwin

Personally appeared before me Orvis M. Brown, a Notary Public, in and for said County and State, one Bert Sandell, who being first duly sworn doth depose and sayeth, that the statements as given in the above Answer, are the truth, the whole truth and nothing but the truth.

Sworn to and subscribed to before me this 13th day of March, 1937.

*Orvis M. Brown*  
Notary Public, Baldwin County.

AFFIDAVIT.

My name is W. H. Hawkins. I am a duly licensed and practicing attorney-at-law, under the laws of the State of Alabama, and I have my office in Bay Minette, Baldwin County, Alabama.

I am familiar with the charges and fees of lawyers practicing in Baldwin County, Alabama. I have carefully checked and looked over the Court File in the cause wherein Gudrun E. Anderson is Complainant, and Paul C. Anderson is Respondent, in the Circuit Court of Baldwin County, Alabama, Equity Division; AND I am of the opinion that Seventy Five Dollars (\$75.00), is a very fair and very reasonable attorney's fee, to be charged by Mr. J. B. Blackburn, who is also a duly licensed and practicing attorney, for his services in this cause.

From the court file, it appears that his services not only include obtaining the decree of divorce and the custody of the minor child, mentioned in the Bill of Complaint, but also includes the issuance and prosecuting of a Writ of Equitable Attachment in said cause.

Therefore, I consider a fee of Seventy Five Dollars (\$75.00) a very reasonable fee.

W. H. Hawkins



AFFIDAVIT.

My name is \_\_\_\_\_ . I am a duly licensed and practicing attorney-at-law, under the laws of the State of Alabama, and I have my office in Bay Minette, Baldwin County, Alabama.

I am familiar with the charges and fees of lawyers practicing in Baldwin County, Alabama. I have carefully checked and looked over the Court File in the cause wherein Gudrun E. Anderson is Complainant, and Paul C. Anderson is Respondent, in the Circuit Court of Baldwin County, Alabama, Equity Division; AND I am of the opinion that Seventy Five Dollars (\$75.00), is a very fair and very reasonable attorney's fee, to be charged by Mr. J. B. Blackburn, who is also a duly licensed and practicing attorney, for his services in this cause.

From the court file, it appears that his services not only include obtaining the decree of divorce and the custody of the minor child, mentioned in the Bill of Complaint, but also includes the issuance and prosecuting of a Writ of Equitable Attachment in said cause.

Therefore, I consider a fee of Seventy Five Dollars (\$75.00) a very reasonable fee.

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TESTIMONY OF GUDRUN E. ANDERSON.

Since this divorce suit has been started my daughter and I have lived as cheaply as possible and it has cost us at least \$25.00 per month to feed and clothe the two of us. \$25.00 per month is, in my opinion, reasonable alimony pendente lite in this cause.

Gudrun E. Anderson

The State of Alabama }  
Baldwin County

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

GUDRUN E. ANDERSON, \_\_\_\_\_ COMPLAINTANT

VS.

PAUL C. ANDERSON, \_\_\_\_\_ RESPONDENT

I, Robert S. Duck, \_\_\_\_\_

as Register and Commissioner \_\_\_\_\_

have called and caused to come before me Gudrun E. Anderson, Hans G. Erickson

and Taylor Wilkins, \_\_\_\_\_

witnesses named in the requirement for Oral Examination, on the 12th day of April

1937, at the office of J. B. Blackburn, \_\_\_\_\_

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

truth, the whole truth, and nothing but the truth, the said Gudrun E. Anderson, Hans G.

Erickson and Taylor Wilkins doth depose and say as follows:

TESTIMONY OF GUDRUN E. ANDERSON.

I am the Complainant in this suit. I am over twenty-one years of age and reside at Silverhill, in Baldwin County, Alabama. The Respondent, Paul C. Anderson, is over twenty-one years of age and at the time this suit was filed was a non-resident of the State of Alabama, residing in Phoenix, Arizona, but since the suit was commenced he has come to Alabama and located in Mobile.

I was lawfully married to the said Paul C. Anderson at Silverhill, in Baldwin County, on March 8, 1919. We lived together as man and wife in Baldwin County, Alabama, until the time of our separation, which was on September 22, 1936. The two of us are the parents of one child, namely, Alice Christine Anderson, a girl now twelve years of age who has always resided with me and who is now residing with me.

Shortly after July 4, 1936, the Respondent, Paul C. Anderson, left Silverhill, Alabama, and told me that he was going to Mobile to be treated by a doctor and from this time up to the time of our separation he was away from home practically all of the time. After the Respondent remained away from home for this long period of time I commenced checking up on his whereabouts and actions during which time he was away. In making this search I went to Mobile with my father, Mr. Hans G. Erickson, and we found that he had rented a room at 206 Conception Street, in Mobile, Alabama and furnished it with furniture and was living in it with a woman representing her to be his wife. I also found that he had carried a woman to a Mobile doctor and represented her as his wife. When I went to see the doctor he was surprised to learn that I was not the woman that the Respondent, Paul C. Anderson, had brought in and represented to be his wife. I learned that the woman who was living with him in Mobile and who he represented to be his wife is Ruth Lambert. Since the separation I have seen Paul C. Anderson and have discussed his relations with this woman and he admitted to me that he had gone to Phoenix, Arizona and that this woman met him but there and came back to Mobile, Alabama with him. I talked with him last week and at that time he told me that he was crazy about this woman and did not love me.

The Respondent, Paul C. Anderson, has commenced drinking and because of this and the environment in which he lives, he is not a proper person to have the care and custody of the minor child, Alice Christine Anderson. The environment under which he is living would be detrimental to her. I am physically and mentally qualified to raise said child and bring her up in a proper home amid proper surroundings. I have no income or property and am totally dependent for the time being upon my own efforts or what Paul C. Anderson might contribute for the support and maintenance of myself and said child. The said Paul C. Anderson owns property in Baldwin County, Alabama, and there are certain moneys owing to him by parties who live in Baldwin County, Alabama, namely: \$120.00 due him by H. E. Edhegard, which is secured by a note; something is due him by Charles Siegler; \$208.40 is due him by O. F. E. Winberg on an open account; \$36.35 is due him by Henry Wilson on an open account; \$20.99 is due him by F. Vasco on an open account; \$183.25 is due him by Bert Sandell on open account; \$23.44 is due him by Joe Dvorack on open account and \$19.64 is due him by G. Hoff on open account, which sums of money should be applied in paying the expenses of this proceeding and to apply on alimony pendente lite. At the time this suit was commenced I could not obtain personal service on Paul C. Anderson as he was a non-resident of the State of Alabama, and there was no way whereby the above described obligations could be subjected to my claim except by equitable attachment.

I waive any claim to permanent alimony in this suit.

Gudrun E. Anderson

Circuit Court, Baldwin County, Ala.  
In Equity.

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

VS.

# COST BILL

Paid \_\_\_\_\_, 193\_\_\_\_\_

Register.

MOORE PRINTING CO., BAY MINNETTE, ALA.

*Recd*  
*7-16*

Serve on \_\_\_\_\_  
**Circuit Court of Baldwin County**  
**IN EQUITY**

**THE STATE OF ALABAMA,**

**BALDWIN COUNTY**

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

Received in office this \_\_\_\_\_

day of \_\_\_\_\_, 193\_\_\_\_\_

**SUMMONS**

SHERIFF

Executed this \_\_\_\_\_ day of \_\_\_\_\_

by leaving a copy of the within Summons with \_\_\_\_\_

vs.

Defendant

Sheriff

By \_\_\_\_\_

Deputy Sheriff

*Paul E. Anderson*

Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

ORAL EXAMINATION

I, Robert S. Duck 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 witnesses and read over to them and they signed the same in the presence of myself ~~and~~, J. B. Blackburn and Ora Sirmon, 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 12th day of April 1937.

Robert S. Duck (L. S.)

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Sumner S. Anderson

COMPLAINANT

VS.

Paul S. Anderson

RESPONDENT

ORAL DEPOSITION

Filed April 12, 1937

Robert S. Duck, Register.

RECORDED IN

Record \_\_\_\_\_

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

\_\_\_\_\_, Register

GUDRUN E. ANDERSON,  
Complainant,  
VS.  
PAUL C. ANDERSON,  
Respondent.

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

ANSWER OF CHARLES SIEGLER.

Now comes Charles Siegler and for answer to the garnishment served upon him in said cause says: That he was indebted to Paul C. Anderson in the sum of Eight Dollars (\$8.00) at the time the Writ of Garnishment in said cause was served upon him and that he is not indebted to Paul C. Anderson in any other way and will not be indebted to him in the future in any other way or manner. Said Garnishee hereby pays said sum of money into the registry of this Court to await its further orders.

Having fully answered, said garnishment and paid into Court the full amount due the said Respondent, Paul C. Anderson, Garnishee respectfully prays that he be discharged with his reasonable costs in this behalf expended.

Charles Siegler

Sworn to and subscribed before me on  
this the 3rd day of April, 1937.

Ora Simon

Notary Public, Baldwin County, Alabama.



GUDRUN E. ANDERSON,  
Complainant,  
VS.  
PAUL C. ANDERSON,  
Respondent.

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

DECREE PRO CONFESSO.

In this cause it being made to appear to the Register that a copy of the Bill of Complaint in this cause, together with a summons requiring him to plead, answer or demur to the said Bill of Complaint within thirty days from the service thereof, was mailed to the Respondent by registered mail, postage prepaid, marked "For Delivery Only to the Person to Whom Addressed. Return Receipt Requested", and that said return receipt was received and filed by me on February 4th, 1937, and said Respondent having failed to plead, answer or demur to the said Bill of Complaint to the date hereof; it is now, therefore, on motion of the Complainant, ORDERED AND DECREED that the Bill of Complaint in this cause be, and it hereby is, in all things taken as confessed against the said Paul C. Anderson, Respondent aforesaid.

Witness my hand this 8th day of March, 1937.

*R. S. Duck*

Register.

GUDRUN E. ANDERSON,  
Complainant,  
VS.  
PAUL C. ANDERSON,  
Respondent.

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

ANSWER.

Now comes Paul C. Anderson, the Respondent in the above entitled cause and for answer to the Bill of Complaint filed therein says:

I, Paul C. Anderson, being the identical person named in the Bill of Complaint do hereby accept service in the above matter, a copy of said Bill of Complaint having been delivered to me and do hereby waive any and all service which may be required or provided by the laws of the State of Alabama.

I admit that I formerly did business as the Silverhill Motor Company and was the sole owner of said business and also admit that any money due the Silverhill Motor Company by H. Edhegard, Charles Siegler, O. F. E. Winberg, F. Vasco, Bert Sandell, Joe Dvorack and G. Hoff is my sole property and as such is subject to future orders of this Court in this proceeding.

I further waive any notice of the reference to be held in this cause and also waive any notice as to the taking of testimony in said cause, and that Complainant may take testimony whenever she desires without my being present.

I further agree that said cause may be submitted at any time which suits the convenience of the Complainant without further notice to me and that this Court may enter Decree in said cause at any time it is submitted to it for such Decree, it being my intent to waive all of the former notices and requisites of the law as to submitting said cause, as to answering said cause and as to taking of the depositions of the witnesses in said cause but insist that the Complainant be required to prove the material allegations of her Bill of Complaint.

I deny each and every allegation of the Bill of Complaint which has not been hereinabove specifically answered and require that strict proof be made of said allegations.

Paul C. Anderson

Respondent.

STATE OF ALABAMA |

BALDWIN COUNTY |

I, Mary Lou Fertenberry, a Notary Public, within and for said County in said State, hereby certify that Paul C. Anderson, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of the instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and official seal on this the 7<sup>th</sup> day of April, 1937.

Mary Lou Fertenberry  
Notary Public, Baldwin County, Alabama.

GUDRUN E. ANDERSON,

Complainant,

VS.

PAUL C. ANDERSON,

Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY. NO. 294.

WRIT OF EQUITABLE ATTACHMENT.

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

WHEREAS, Gudrun E. Anderson has exhibited in the Circuit Court of Baldwin County, Alabama, in Equity, her Bill of Complaint against Paul C. Anderson, and has obtained thereon an order for the issuance of a Writ of Attachment against the property of the said Paul C. Anderson as hereinafter mentioned:

NOW THEREFORE, you are hereby commanded to attach without delay the property of the said Paul C. Anderson, to-wit: \$120.00 due him by H. Edhegard on a note dated September 14, 1936, and due January 1, 1937; \$48.06 due him by Charles Seigler on a note dated May 21, 1934, and due August 4, 1934; \$208.40 due him by O. E. F. Windberg on open account; \$36.35 due him by Henry Wilson on open account; \$20.99 due him by F. Vasco on open account; \$183.25 due him by Bert Sandell on open account; \$23.44 due him by Joe Dvorack on open account; \$19.64 due him by G. Hoff on open account and household goods, and said property you will hold subject to the further orders and decrees of said Court, and this writ with your proper indorsement thereon you will return to the said Circuit Court of Baldwin County, Alabama, in Equity on or before the 25th day of February, 1937.

IN WITNESS WHEREOF, I have hereunto set my hand as Register and affixed the seal of the Court on this the 25th day of January, 1937.

*RS Duck*

Register.

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Your Oratrix, Gudrun E. Anderson, presents this Bill of Complaint against Paul C. Anderson, and thereupon your Oratrix complains and shows unto the Court and your Honor as follows:

1. Your Oratrix is over twenty-one years of age and a resident of Silverhill, in Baldwin County, Alabama, and the Respondent, Paul C. Anderson, is over twenty-one years of age and a non-resident of the State of Alabama, whose residence and post office address is General Delivery, Phoenix, Arizona.

2. Your Oratrix and the said Paul C. Anderson were lawfully married at Silverhill, in Baldwin County, Alabama, on March 8, 1919, and lived together as man and wife, in Baldwin County, Alabama, until they separated on September 22, 1936; that out of said wedlock there was born one child, namely: Alice Christine Anderson, a girl now twelve years of age, who has always resided with your Oratrix and who is now residing with her.

3. Your Oratrix further avers that the said Paul C. Anderson has committed adultery and/or lived in adultery immediately before and since the date of their said separation and that he is now living separate and apart from your Oratrix and has lived separate and apart from her continuously since September 22, 1936.

4. Your Oratrix further avers that the said Paul C. Anderson is not a proper person to have the care and custody of said child and the environment under which he is living would be detrimental to her, and your Oratrix is physically and mentally qualified to raise the said child and bring her up in a proper home and environment. Your Oratrix is a woman of good character and has no income or property from which she can derive an income and she is totally dependent upon her own efforts or what the said Paul C. Anderson might contribute for the support of herself and said child. The said Paul C. Anderson owns property within the jurisdiction of this Honorable Court and there are certain moneys owing him by

parties within the jurisdiction of this Honorable Court, namely: \$120.00 due him by H. Edhegard on a note dated September 14, 1936, and due January 1, 1937; \$48.06 due him by Charles Seigler on a note dated May 21, 1934 and due August 4, 1934; \$208.40 due him by O. F. E. Windberg on open account; \$36.35 due him by Henry Wilson on open account; \$20.99 due him by F. Vasco on open account; \$183.25 due him by Bert Sandell on open account; \$23.44 due by Joe Dvorack on open account; \$19.64 due him by G. Hoff on open account, and household goods, all of which should be applied in caring for your Oratrix and her said child, and to pay her solicitor's fee in this cause incurred which she is not able to pay, and as the said Paul C. Anderson is a non-resident of the State of Alabama, she cannot obtain personal service upon him so that a valid personal judgment can be rendered against him and there is no way whereby the above described money or property can be subjected to the claim of your Oratrix except by equitable attachment, in which attachment your Oratrix has elected not to give a bond as the Respondent is a non-resident of the State of Alabama.

PRAYER FOR PROCESS.

Your Oratrix prays that the said Paul C. Anderson be made a party respondent to this Bill of Complaint and that the usual process of this Honorable Court do forthwith issue to him.

PRAYER FOR RELIEF.

Your Oratrix prays that an equitable attachment be immediately issued attaching all of the above described property and any other property of the Respondent, Paul C. Anderson, that can be found within the jurisdiction of this Court; that your Honor will enter a decree ordering the Register of this Court to hold a reference to ascertain what would be a reasonable amount to be allowed your Oratrix as alimony pendente lite and also what would be a reasonable amount to allow her as solicitor's fees in this cause incurred; that after such report is made by such Register your Honor will enter a decree requiring the said Respondent to pay such alimony and solicitor's

says: That she is the Complainant in the above entitled cause; that she has read over the foregoing Bill of Complaint and that the allegations contained therein are true.

Yudrum E. Anderson

Sworn to and subscribed before me  
on this the 14<sup>th</sup> day of January, 1937.

J. B. T. Stachman

Notary Public, Baldwin County, Alabama.

It appearing to the undersigned as Register of the Circuit Court of Baldwin County, Alabama, in Equity, from the foregoing Bill of Complaint that the Respondent, Paul C. Anderson, is a non-resident of the State of Alabama, therefore, let an attachment issue without bond according to the prayer in the Bill.

Dated this 25 day of January, 1937.

R. S. Duck

Register.

GUDRUN E. ANDERSON, Complainant.

vs.

Paul C. Anderson, Respondent.

REGISTER'S REPORT ON REFERENCE.


Under and by virtue of an order of reference in this cause, issued by the Hon. F. W. Hare, Judge of the Circuit Court of Baldwin County, Alabama, in Equity, dated the 12th day of April, 1937, the Register begs leave to report as follows:-

A. That a reference was held at Bay Minette, Alabama, on the 10th day of July, 1937, and said Register finds that a reasonable amount to be allowed Complainant as alimony pende<sup>n</sup>te lite, should be Twenty-Five Dollars (\$25.00).

B. That the Register finds that a reasonable fee to be allowed Solicitor for Complainant should be Seventy-Five Dollars, (\$75.00).

C. That a reasonable amount to be allowed Complainant as permanent alimony should be

Given under my hand and seal this the 27th day of July ,  
1937.

  
\_\_\_\_\_  
Register of Circuit Court of  
Baldwin County, Alabama.



GUDRUN E. ANDERSON,  
Complainant,  
VS.  
PAUL C. ANDERSON,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY. NO. 294.

DECREE OF DIVORCE.

This cause coming on to be heard was submitted upon the Bill of Complaint, Decree Pro Confesso on service by registered mail, Register's report of reference, 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 her said Bill.

It is, therefore, Ordered, Adjudged and Decreed by the Court, that the bonds of matrimony heretofore existing between the Complainant and Respondent be, and the same are hereby dissolved and the said Gudrun E. Anderson is forever divorced from the said Paul C. Anderson for and on account of the grounds alleged in said Bill of Complaint.

It is further Ordered, Adjudged and Decreed that the Complainant pay to J. B. Blackburn, her solicitor in this cause, the sum of \$75.00, the Register's report being hereby in all things ratified and confirmed so far as affects said solicitor's fee.

It is further Ordered, Adjudged and Decreed by the Court that the said Gudrun E. Anderson be, and she is hereby granted the custody of her minor child, Alice Christine Anderson.

✓ It is further Ordered that the said Gudrun E. Anderson be and she is hereby permitted to again contract marriage but shall not again marry except to the said Paul C. Anderson, until sixty days after this date, and if an appeal is taken within sixty days, she shall not marry again except to the said Paul C. Anderson during the pendency of said appeal.

Done this 2<sup>nd</sup> day of Aug, 1937.

*J. M. Hare*  
Judge of the Circuit Court.

RECORDED

*Duck*

7-77

Filed April 1, 1937.  
R. S. Duck, Register

IN THE CIRCUIT COURT OF  
BALTIMORE COUNTY, MARYLAND  
IN AND FOR THE CITY OF BALTIMORE

WILLIAM H. HARRISON,  
Complainant,  
vs.  
PAUL G. ANDERSON,  
Respondent.

DECREE

RECORDED  
2-29-34

*Wessel*

*Filed Aug. 7, 1934  
Robert S. Dwyer, Register*

This case comes on for hearing on the Bill of Complaint, together with the answer thereto, and the report of the referee, and the report of the court in the matter of the Bill of Complaint, and on consideration thereof, the court is of the opinion that the Respondent is entitled to relief prayed for in her said Bill.

It is therefore, ordered, adjudged and decreed by the court, that the Board of Machinery Erectors existing between the Complainant and Respondent be, and the same are hereby dissolved and the said Board is forever dissolved from this date.

Paul G. Anderson for and on account of the goods alleged in said Bill of Complaint.

It is further ordered, adjudged and decreed that the Complainant pay to the Respondent, for solicitor in this cause, the sum of \$28.00, the Respondent's report being hereby in all things verified and confirmed so far as respects said solicitor's fee.

It is further ordered, adjudged and decreed by the court that the said Paul G. Anderson do, and he is hereby granted the custody of her minor child, Alice Kristine Anderson.

It is further ordered that the said Paul G. Anderson be and he is hereby permitted to retain control and possession of all and every thing except to the said Paul G. Anderson, until sixty days after this date, and if at the expiration of said sixty days, the said Paul G. Anderson again except to the said Paul G. Anderson, the custody of said child, Alice Kristine Anderson.

RECORDED

*Duck*  
7-259

Filed 29<sup>th</sup> day of July,  
1937.

*N. S. Duck, Register*

RECORDED  
*Duck*  
7-82

ANSWER OF PAUL C. ANDERSON

GUDRUN E. ANDERSON,

Complainant,

VS.

PAUL C. ANDERSON,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY. NO. 294.

Filed on the 7th day of  
April, 1937.

*P. S. Duck*

Register.

RECORDED  
INDEXED  
7-2-36

DECREE PRO CONFESSO.

GUDRUN E. ANDERSON,

Complainant,

VS.

PAUL C. ANDERSON,

Respondent.

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

*Filed March 8<sup>th</sup> 1937.  
O. S. Duck's Register.*

RECORDED  
INDEXED  
7-78

Filed 10/13/37  
R. S. Dyer  
Birmingham

IN THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT OF ALABAMA

WILLIAM W. BROWN, Plaintiff,

vs.  
THE ALABAMA POWER CO., Defendant.

WITNESSETH that the above named parties have entered into the following stipulation:

That the parties hereto have agreed to submit to the arbitration of the Alabama Power Company the following issues:

1. The amount of damages to be paid by the Alabama Power Company to the Plaintiff for the loss of his property.

GUDREN E. ANDERSON

Complainant

vs.

PAUL C. ANDERSON,

Respondent,

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, \_\_\_\_\_

DECREE PRO CONFESSO, TESTIMONY OF GUDREN E. ANDERSON, HANS ERICKSON,  
TAYLOR WILKINS; and W. H. HAWKINS:

and in behalf of Defendant upon \_\_\_\_\_ ANSWER AND WAIVER OF PAUL C. ANDERSON \_\_\_\_\_

*R. E. Duck*

Register.

FOR

DOLLARS

\$

PAY TO THE  
ORDER OF

193

MONROEVILLE, ALA.

MEMBER OF THE FEDERAL RESERVE SYSTEM

**THE FIRST NATIONAL BANK**



COUNTER CHECK



*Duck*  
RECORDED  
2-293

No. 294

The State of Alabama  
BALDWIN COUNTY

IN EQUITY  
Circuit Court of Baldwin County

GUDDREN E. ANDERSON

vs.

PAUL C. ANDERSON

NOTE OF TESTIMONY

Filed in Open Court this 31st

day of July 1937

*Paul C. Anderson*

REGISTER

MOORE PRINTING CO., 515 BIRMINGHAM, ALA.

Dear Duck;  
Nothing in Decree about  
alimony - Suppose Blackburn has  
abandoned this - Had up filing the  
Decree if any chance to get anything  
Regards - F.W. Hare

Post Office Department

OFFICIAL BUSINESS

REGISTERED ARTICLE

No. 477

INSURED PARCEL

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

Return to

R. X. Decker, Clerk

Street and Number

or Post Office Box

Post Office at

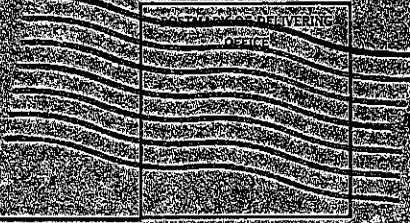
Day Minette, Ala.

Rev. 3-24

5-5116

State \_\_\_\_\_

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE \$300



RECEIPT FOR REGISTERED ARTICLE No. \_\_\_\_\_

10 fee paid. 1 class postage paid. 1-25-, 1937

Declared value, \$ Legal Document Surcharges paid, \_\_\_\_\_

From R. S. French Co. (Sender)

Addressed to Paul D. Anderson (Post office and State)

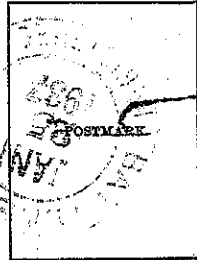
Ken Del Phoenix, Ariz (Address) (Post office and State)

Accepting employee will place initials in space below, indicating restricted delivery

Return receipt fee 3 in person \_\_\_\_\_ or order \_\_\_\_\_ Special delivery fee \_\_\_\_\_

Delivery restricted to addressee \_\_\_\_\_ Fee paid 10 Postmaster, per \_\_\_\_\_

5-686v



# RETURN RECEIPT

Received from the Postmaster the Return of Insured Article, the original  
order of which appears on the face of this Card.

*Paul C. Anderson*

(Signature of Insured or Successor)

(Signature of Postmaster's Agent)

POSTMASTER: RETURN TO THE POST OFFICE AT THE ADDRESS OF THE POSTMASTER GENERAL, WASHINGTON, D. C.

U.S. POSTAGE  
FIRST CLASS  
NOV 19 1944  
U.S. POSTAL SERVICE