

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon LAWRENCE E. HOLLINGSWORTH to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, 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 ANNIE HOLLINGSWORTH against LAWRENCE E. HOLLINGSWORTH, and further to do and perform what said Judge shall order and direct in that behalf. And this the said Respondent 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, R. S. DUCK, Register of said Circuit Court, this the 4 day of July, 1942.

R. S. Duck
Register.

ANNIE HOLLINGSWORTH, COMPLAINANT,

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA,

LAWRENCE E. HOLLINGSWORTH, RESPONDENT.

IN EQUITY.

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

Now comes your Complainant, ANNIE HOLLINGSWORTH, and humbly complaining against the Respondent, LAWRENCE E. HOLLINGSWORTH, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Respondent are both over twenty-one years of age, and residents of Baldwin County, Alabama;

2.

That the Complainant and the Respondent were married at Bay Minette, Alabama, on December 16, 1941, and lived together as husband and wife, in Baldwin County, Alabama, until, to-wit: February 25, 1942..

3.

That, on to-wit: February 25, 1942, and at various times prior thereto, the Respondent cursed, threatened and abused the Complainant and threatened to do violence to her person, which would necessarily endanger her life and health; that the conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe, and she did actually believe that if she continued to live with him as his wife, he would do actual violence to her person, which would necessarily endanger her life and health;

Wherefore, the premises considered, your Complainant prays that your Honor will by proper process make the said LAWRENCE E. HOLLINGSWORTH party respondent to this cause of action, requiring him to plead, answer or demur to the

same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing hereof, your Honor will give and grant unto her a divorce decree, forever barring the bonds of matrimony existing between the Complainant and the Respondent; and that your Honor will give and grant unto her such other, further, different and general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

BEEBE & HALL

By:

A. M. Hall

Solicitor For Complainant.

ANNIE HOLLINGSWORTH, COMPLAINANT,

VS.

LAWRENCE E. HOLLINGSWORTH, RESPONDENT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY.

And now comes the Respondent, LAWRENCE E. HOLLINGSWORTH, in his own proper person and accepts service of summons and complaint in the above cause, and denies each and every allegation contained in the Bill of Complaint, and demands strict proof of the same.

The Respondent waives notice of the time of taking testimony on behalf of the Complainant, the right to cross examine the Complainant's witnesses, and agrees that this cause be submitted for final decree, forthwith without further notice.

C. R. Mackley Witness

Lawrence E. Hollingsworth
Respondent.

The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

ANNIE HOLLINGSWORTH

Complainant

VS

LAWRENCE E. HOLLINGSWORTH

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~DECEASED BY COMMISSIONER~~
~~on Answer & Waiver of the Respondent~~ 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 here-
tofore existing between the Complainant and Defendant be, and the same are hereby, dissolved,
and that the said ANNIE HOLLINGSWORTH
is forever divorced from the said

LAWRENCE E. HOLLINGSWORTH

for and on account of

Cruelty

It is further 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 further ordered that the Complainant and the Respondent
be, and ~~they are~~ hereby permitted to again contract marriage upon the payment of the cost of
this suit.

It is further ordered that Annie Hollingsworth
the Complainant pay the cost herein to be taxed, for which execution may issue.

This 17 day of

August

1922

J. W. Stone

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.

RECORDED

No. 854 Page

The State Of Alabama
Baldwin County

In Circuit Court, In Equity

..... ANNETTE HOLLINGSWORTH
vs. Complainant.
.....

..... LAWRENCE E. HOLLINGSWORTH
Respondent.
.....

DIVORCE DECREE

*Filed July 18 1945
J. S. [Signature]*

[Faint, illegible text, likely bleed-through from the reverse side of the document]

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Answer

~~2~~ Aug 14 1948
Randy
Red

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ANNIE HOLLINGSWORTH, COMPLAINANT,

VS.

LAWRENCE E. HOLLINGSWORTH, RESPONDENT.

SUMMONS & COMPLAINT

Filed Aug 17 1942
Beebe & Hall

BEEBE & HALL
BY H. M. Hall

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon LAWRENCE E. HOLLINGSWORTH to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, 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 ANNIE HOLLINGSWORTH against LAWRENCE E. HOLLINGSWORTH, and further to do and perform what said Judge shall order and direct in that behalf. And this the said Respondent 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, R. S. DUCK, Register of said Circuit Court, this the _____ day of _____, 1942.

Register.

ANNIE HOLLINGSWORTH, COMPLAINANT,

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA,

LAWRENCE E. HOLLINGSWORTH, RESPONDENT.

IN EQUITY.

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

Now comes your Complainant, ANNIE HOLLINGSWORTH, and humbly complaining against the Respondent, LAWRENCE E. HOLLINGSWORTH, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Respondent are both over twenty-one years of age, and residents of Baldwin County, Alabama;

2.

That the Complainant and the Respondent were married at Bay Minette, Alabama, on December 16, 1941, and lived together as husband and wife, in Baldwin County, Alabama, until, to-wit: February 25, 1942.

3.

That, on to-wit: February 25, 1942, and at various times prior thereto, the Respondent cursed, threatened and abused the Complainant and threatened to do violence to her person, which would necessarily endanger her life and health; that the conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe, and she did actually believe that if she continued to live with him as his wife, he would do actual violence to her person, which would necessarily endanger her life and health;

Wherefore, the premises considered, your Complainant prays that your Honor will by proper process make the said LAWRENCE E. HOLLINGSWORTH party respondent to this cause of action, requiring him to plead, answer or demur to the

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same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing hereof, your Honor will give and grant unto her a divorce decree, forever barring the bonds of matrimony existing between the Complainant and the Respondent; and that your Honor will give and grant unto her such other, further, different and general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

BA H. W. HETT
BANKER & AVITT

Handwritten signature

SAINTONE V. VID COMBET

BRENN & HALL

By: *H. M. Hall*

Solicitor for Complainant.

IVALENCE
WVWIE HOI
COMBET

ANNIE HOLLINGSWORTH, COMPLAINANT,

VS.

LAWRENCE HOLLINGSWORTH, RESPONDENT.

BY: *[Signature]*
BEEBE & HALL

SUMMONS AND COMPLAINT

BEEBE & HALL
BY H. M. Hall

[Handwritten signature]
Oct 1 1902

IN CASE OF THE ABOVE NAMED PARTIES.
The Court of said County do hereby certify that the within and foregoing is a true and correct copy of the original thereof as the same appears from the records of said Court.
Witness my hand and seal of office at the County Seat of said County, this 1st day of October, 1902.

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THE STATE OF ALABAMA }
Baldwin County }

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

ANNIE HOLLINGSWORTH

COMPLAINANT

VS.

LAWRENCE E. HOLLINGSWORTH

RESPONDENT

I, Frances Brantley

as Register and Commissioner

have called and caused to come before me Annie Hollingsworth and Ada White

witnesses named in the Requirement for Oral Examination, on the 11th day of August

19 42, at the office of BEER & HALL

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

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

Annie Hollingsworth doth depose and say as follows:

My name is Annie Hollingsworth. I live at Dyas, in Baldwin County, Alabama, and I am over twenty-one years of age. Lawrence E. Hollingsworth, the Respondent, also lives at Dyas, in Baldwin County, Alabama, and is over twenty-one years of age. The Respondent and I were married at Bay Minette, in Baldwin County, Alabama, on December 16, 1941. We lived together as husband and wife in Baldwin County, Alabama, until on, to-wit: February 25, 1942.

The Respondent is a man of high and ungovernable temper and often while we were living together threatened and abused me. His conduct toward me grew worse from time to time until it finally got to the point where it was absolutely impossible for me to live with him.

His conduct was such as to give me every reasonable apprehension to believe, and I did actually believe that if I continued to live with him he would carry out his threats and do violence to my person which would necessarily endanger my life and health.

I am thoroughly convinced that it is absolutely impossible for us to live together as husband and wife. We have no children.

Annie Hollingsworth

ADA WHITE, A WITNESS FOR THE COMPLAINANT, HAVING BEEN FIRST DULY SWORN, DEPOSES AND SAYS:

My name is Ada White. I live at Bay Minette, in Baldwin County, Alabama. I am personally acquainted with the Complainant, Annie Hollingsworth and the Respondent Lawrence E. Hollingsworth. I remember about the time that they were married at Bay Minette. I have often heard the Complainant complain about the conduct of the Respondent. The conduct of the Respondent was such that the Complainant was unable to live with him as his wife. From my own personal knowledge, and from information that I have I know that the Complainant and the Respondent cannot live together as husband and wife.

Ada White

ORAL EXAMINATION

I, Frances Brantley, as Register and Commissioner hereby certify that the foregoing depositions 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 H. M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witnesses or had proof made before me of the identity of said witnesses; 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 13th day of August, 1942.

Frances Brantley

(L. S.)

No. 864 Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

ANNIE HOLLINGSWORTH Complainant

Vs.

LAWRENCE E. HOLLINGSWORTH Respondent

ORAL DEPOSITION

Filed Aug 14, 1942
Frances Brantley, Register

RECORDED IN _____ Record

Vol. _____ Page _____ Register _____

ANNIE HOLLINGSWORTH, COMPLAINANT

VS.

LAWRENCE E. HOLLINGSWORTH, 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, _____

Answer and Waiver of the Respondent, and testimony of Annie Hollingsworth _____

and Ada White _____

and in behalf of Defendant upon _____

R. Deuch

Register.

RECORDED

No. 854

The State of Alabama,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

ANNIE HOLLINGSWORTH, COMPLAINANT,
VS.

LAWRENCE E. HOLLINGSWORTH, RESPONDENT

NOTE OF TESTIMONY

Filed in Open Court this 14
day of July 1942
Robert
Register.

REQUEST FOR DECREE IN VACATION

Printed by The Baldwin Times

State of Alabama,
Baldwin County.

} NO. _____ TERM, 194 _____

ANNIE HOLLINGSWORTH, Complainant.

VS.

LAWRENCE E. HOLLINGSWORTH
Respondent.

TO R. S. DUCK, REGISTER:

In the above stated cause a n Answer and Waiver _____
having been _____ filed by _____ the Respondent—,
and evidence having been taken, and the cause being ready for submission for final decree, and
no defense having been interposed, the complainant—, by BEEBE & HALL,
Solicitor^s 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.

Beebe & Hall
Solicitor— for Complainant—.

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NO. 854

ANNIE HOLLINGSWORTH

Complainant—

VS.

LAWRENCE E. HOLLINGSWORTH

Respondent—

Request For Decree In Vacation

Filed Aug 14, 1942

R. Duch

Register.