

1051

The State of Alabama, } No. 1051.

Baldwin County.

Circuit Court, in Equity

Letha Whitehurst Complainant.

vs.

Louis Whitehurst, Defendant.

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint decree pro confesso and the testimony as noted by the Register; and upon consideration thereof, the Court is of opinion that the Complainant is entitled to the relief prayed for in said bill.

IT IS, THEREFORE, Ordered, adjudged and decreed by the Court, that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and the Complainant is forever divorced from the Defendant.

on account of cruelty.

It further orderd, that the said Letha Whitehurst, be, and she is hererby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Letha Whitehurst, pay the costs herein taxed, for which execution may issue, and if such execution is returned "n property found," then execution for such costs may issue against the said

Letha Whitehurst,

It is further ordered, adjudged and decreed that said Letha Whitehurst, shall not again marry except to said Louis Whitehurst, until sixty days after this date, and that if an appeal is taken within sixty days she shall no marry again except to said Louis Whitehurst,

during the said pendency of appea

This 22nd day of July 1932

Judge of the Circuit Court of Baldwin County.

STATE OF ALABAMA, } Baldwin County.

Circuit Court, in Equity

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

Complainant.

vs.

Defendant.

as appears of record in said Court,

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

Register

1051

The State of Alabama, Baldwin County.

No. 1051.

Circuit Court, in Equity.

Letha Whitehurst

Complainant

vs.

Louis Whitehurst,

Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the testimony as noted by the Register; and upon consideration thereof, the Court is of opinion that the Complainant is entitled to the relief prayed for in said bill.

IT IS, THEREFORE, Ordered, adjudged and decreed by the Court, that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and the Complainant is forever divorced from the Defendant.

on account of cruelty.

It further orderd, that the said Letha Whitehurst, be, and she is hererby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

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

Letha Whitehurst,

It is further ordered, adjudged and decreed that said Letha Whitehurst, shall not again marry except to said Louis Whitehurst, until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said Louis Whitehurst,

during the said pendency of appeal

This 22nd day of

July 1932

J. M. Ware

Judge of the Circuit Court of Baldwin County.

STATE OF ALABAMA, Baldwin County.

Circuit Court, in Equity.

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

Complainant

vs.

Defendant

as appears of record in said Court.

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

day of 192

Register

*original*

Letha Whitehurst, )  
Complainant )  
vs )  
Louis Whitehurst, )  
Respondent .

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

Amendment of Complaint.

Comes now the complainant and amends her Complaint by adding at the end of paragraph 1 of the complaint the following additional words Viz: That at times respondent <sup>Louis Whitehurst</sup> committed acts of actual violence on the person of your Oratrix attended with danger to her life and health and his conduct was such to cause her to have a reasonable apprehension of actual violence on her person attendant with danger to her life and health that for this cause she <sup>was</sup> forced to leave respondent and return to live with her Uncle Edward Faulk at Bay Minette, Alabama, where she has since resided since she ceased to live with the respondent about a year ago.

Complainant amends her complaint by adding the following additional count, viz:

3. Your Oratrix further shows that after she married respondent he became addicted after marriage to your Oratrix to habitual drunkenness.

*S. Jenkins*

Solicitor for Complainant

Foots Note:

The respondent is required to answer the foregoing Bill of Complaint from paragraph one to paragraph three inclusive, but not under oath, oath to the answer being hereby expressly waived .

*S. Jenkins*

Solicitor for Complainant .

*Revised*  
No. 1051.

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY,  
BALDWIN COUNTY, ALA.

*Etha Whitehurst*

vs.

*Louis Whitehurst,*

DECREE OF DIVORCE.

Filed in office this *22nd*

day of *July* 1932 ~~1933~~

*W. H. [Signature]*  
Register.

E. O. M.

Moore Printing Co. .... Bay Minette, Ala.

Letha Whitehurst, Complainant  
vs

Louis Whitehurst, Respondent

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

Comes Louis Whitehurst, the person named as defendant or respondent in the above stated cause, and for answer to the bill of complaint herein, says He denies each and every allegation of the same and therein contained and demands strict proof of the same, except that he admits that he married the complainant, Letha Whitehurst, on February 23rd, 1930 and that they lived as husband and wife in Mobile county and that they separated about one year ago, while they were living in Mobile and admits that they are both residents of the state of Alabama and have so resided for past three years.

Respondent waives service by the sheriff of subpoena on said bill of complaint filed in said cause, also, a copy of the interrogatories that may be filed in the cause, and waives the right to cross examine the witnesses and waives notice of the time of taking the evidence in the cause either on or examination of witnesses or on interrogatories fixed in the cause and the right to cross said interrogatories that may be filed in the cause and consents that the cause may be submitted to the Circuit Judge for decree in vacation on note of testimony to be taken and made by the Register.

Dated June 11, 1932  
Witnessed A. D. Price (signature) Louis Whitehurst

Tom Reed  
state of Alabama,  
Mobile County

A Notary Public in and for said

Before me \_\_\_\_\_  
County and state, personally appeared Louis Whitehurst, who being by me first duly sworn, on oath says that he signed the foregoing answer to a certain Bill of Complaint, filed on the 4th day of June, 1932, in the Circuit Court of Baldwin County, Alabama, wherein Letha Whitehurst is Complainant and Louis Whitehurst is respondent and the same above is his signature to same and I further certify that said Louis Whitehurst is known to me and that he signed said answer in my presence and on the date therein set out.

Given under my hand and seal this \_\_\_\_\_ day of June 1932.

Notary Public, Mobile County, Alabama.

8550 REQUEST FOR DECREE IN VACATION.

MOORE Ptg CO.

STATE OF ALABAMA,  
Baldwin County.

}

CIRCUIT COURT, IN EQUITY.

No. 1051

Vacation

Term, 1932

Letha Whitehurst, Complainant

vs.

Sarah Catrett, Defendant

To T.W. Richerson, Register :

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having <sup>on original bill as amended</sup> been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by S.C. Jenkins, Esq.,

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

*S. C. Jenkins*  
Solicitor for Complainant.

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 LOUIS WHITEHURST

506 Selma St  
Mobile, Ala

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

LETHA WHITEHURST

against said LOUIS WHITEHURST

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

WITNESS, T. W. Richerson, Register of said Circuit Court, this 4th day of

June 193 2

T. W. Richerson Register.

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

8581 NOTE OF TESTIMONY

Letha Whitehurst

vs.

Louis Whitehurst,

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

This cause is submitted in behalf of Complainant upon the ~~original~~ <sup>as Amended</sup> Bill of Complaint, <sup>and</sup> ~~and~~ service on Defendant, answer of Defendant ~~and~~ testimony of Letha Whitehurst, Sarah Currett and Tom Reed,

and in behalf of Defendant upon

*D. W. Dickerson*  
Register.



The State of Alabama }  
Baldwin County

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

LETHA WHITEHURST COMPLAINANT

vs.

LOUIS WHITEHURST RESPONDENT

I, T. W. RICHMOND

as Register and Commissioner BALDWIN COUNTY, ALABAMA

have called and caused to come before me LETHA WHITEHURST, SARAH CATRETT and  
TOM REED

witness named in the Requirement for Oral Examination, on the 28 day of June

19 32, at the office of REGISTER

in BAY MINETTE, Alabama, and having first sworn said witness<sup>es</sup> to speak the

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

doth depose and say as follows:

My name is Letha Whitehurst; I am a resident of Baldwin County, Alabama. I have been a resident of Baldwin County, State of Alabama, for the past three years before the filing of the bill of complaint in this cause. I am the complainant in said cause and I was married to the Respondent, Louis Whitehurst at Prichard, Alabama, Mobile, County, Alabama, February 22, 1930,. We lived together as husband and wife until June 1, 1931, when I was forced to leave him and returned to live at Bay Minette, Alabama on account of his misconduct and cruel treatment of me; since said time I have lived at Bay Minette with my Uncle, Edward Faulk, except when I am off at work. I am going on 19 years old, and I was seventeen years old when I was married. My husband is upwards of twenty-one years of age, I think he is twenty-one. He is a resident citizen of Baldwin County, Alabama, residing temporarily at 506 Selma St., Mobile, Alabama. Whenever my husband, Louis Whitehurst would get drunk he would treat me most cruelly. We lived at Prichard, Alabama, in Mobile County until June 1, 1931, After we were married my husband became addicted to drunkenness and stayed drunk most of the time. He drank so much and so constantly that he couldn't keep a job, and I suffered at times for want of something to eat. At times when he would get drunk he would tear up the furniture and run me off of the premises. At one time he even whipped me. He became so mean and quarrelsome that I had to leave him for the fear that he would do me great bodily harm and in a fit of temper, even when he would not be drunk he would jump on me and beat me.

*Letha Whitehurst*

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 Louis Whitehurst,

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

of ~~of Baldwin~~ Mobile 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 <sup>AMENDED</sup> a Bill of Complaint lately exhibited by Letha Whitehurst,

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

against said Louis Whitehurst,

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

WITNESS, T. W. Richerson, Register of said Circuit Court, this 16th day of July 1932.

T. W. Richerson Register.

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

506. Selma St

Letha Whitehurst, Complainant,  
vs  
Louis Whitehurst, Respondent.

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

Comes the defendant, Louis Whitehurst, for a further answer to the Bill of Complaint as amended and to the Bill of Complaint as heretofore exhibited against him and says:

(1)

He admits the parties were legally married at the time and place alleged in the complaint

(2)

He admits that the residence of the parties is as alleged in the complaint

(3)

He admits that while they were living as husband and wife in Mobile that they separated on towit June 1931 and have not since said separation lived together as husband and wife and that they are now both residents of the state of Alabama and have resided in said state for the past three years.

Defendant or respondent waives service by the sheriff of a subpoena on the amended Bill of complaint filed in the cause and waives the right to cross examine witnesses that may testify in said cause for complainant and waives notice of the time of taking the evidence in the cause either on oral examination of witnesses or on interrogatories filed in the cause and consents that the cause may be submitted to the Circuit judge for degree in vacation on note of testimony to be taken and made by the Register .

Dated 20<sup>th</sup> Day of July 1932

Louis Whitehurst

Witnesses :

Tom Reed  
A D Price

Letha Whitehurst, )  
 Complainant, )  
 VS )  
 Louis Whitehurst, )  
 Respondent

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

To The Honorable Francis W. Hare, Judge of the Twenty First Judicial Circuit of Alabama, which includes Baldwin County :

Your Oratrix, Letha Whitehurst, respectfully represents unto your Honor as follows:

1. Your Oratrix, Letha Whitehurst and Louis Whitehurst were legally married in Mobile, Alabama at Pritchard, Ala. in said county, February 22nd, 1930.

and lived together as husband and wife until June 1st, 1931, when on account of cruelty and bad conduct towards her by respondent, Louis Whitehurst, she was forced to leave him and return to Bay Minette, Alabama where she has since lived with her <sup>uncle</sup> ~~brother~~ Edward Faulk. While she lived with respondent as his wife, he would at times get drunk and beat her and treat her most cruelly and at times she actually suffered from hunger, as he would not work at steady work and times was often <sup>when</sup> he was out of work and did not support her. Since she left respondent in June 1931, she has not lived with said respondent as husband and wife and she has not received any support at all from him.

2. Your Oratrix, Letha Whitehurst and respondent, Louis Whitehurst are both bona fide residents of <sup>Baldwin County</sup> state of Alabama and are both over the age of eighteen years; your Oratrix has for past year been a bona fide resident of Baldwin County, Alabama, residing at Bay Minette, Alabama. Respondent now resides <sup>temporarily</sup> at 506, Selma Street, Mobile, Alabama. Your Oratrix has been for more than the past three years before the filing of the Bill in this cause, a bona fide resident of the state of Alabama.

Wherefore, the premises considered, your Oratrix, prays a subpoena be issued and directed to the said Louis Whitehurst, the respondent in this cause; that he be brought before this honorable court and directed to answer the charges herein made against him under the rules of this Honorable court; that he be made a party defendant or respondent to this Bill of Complaint and that upon a final hearing of the evidence your Honor will order, adjudge, and decree that the bonds of matrimony heretofore existing between your Oratrix and the said Louis Whitehurst be forever dissolved and that your Oratrix be permitted to marry again and that she be granted such other and further relief as may in equity and good conscience may seem proper and meet to your Honor. And your Oratrix will ever pray etc.

Foot Note:  
 The respondent is required to answer each and every paragraph of the foregoing Bill of Complaint, item 1 to 2 inclusive, but his answer under oath is hereby expressly waived  
 B. Jenkins Solicitor for Complainant

The State of Alabama }  
Baldwin County

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

Letha Whitehurst, COMPLAINANT

VS.

Louis Whitehurst, RESPONDENT

I, T.W. Richerson,

of Baldwin Co, Ala,  
as Register and Commissioner

have called and caused to come before me Letha Whitehurst, and Sarah Catrett,

witness named in the requirement for Oral Examination, on the \_\_\_\_\_ day of \_\_\_\_\_

193\_\_\_\_, at the office of Register,

in Bay Minette, Alabama, and having first sworn said witness<sup>es</sup> to speak the

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

doth depose and say as follows:

Letha Whitehurst deposes and Says:-I am the complainant in this cause, I am a bon a fide resident of Baldwin County, Alabama and am 19 years years of age and have been a resident of this County all my life except for a time when I lived with my husband Louis Whitehurst from Feb 22,nd 1930,until June 1st 1931 where I lived with at Prichard ~~Mobile~~ County, at which I forced to leave him and returned to live at Bay Minette on account of his mis conduct and cruel treatment of me, and since that time I have lived with my Uncle Edward Faulk at Bay Minette, except when I am off at work,my husband is a resident citizen of Baldwin County, Alabama, except when he is off at work, He is now temporarily at work in Mobile Alabama,After we were married ~~to~~ Feb 22nd 1930, Louis Whitehurst my husband,became addicted to habitual drunkenness, he continued to drink habitually until the time I left him June the 1st 1931, at times I lived with him I suffered for the lack of something to eat at time when he would get drunk he would tear up the furniture in the house and run me off the premises,Just before I left him to wit: June 1st 1931, he drew a knife on me and threatened to kill me or otherwise do me great bodily harm at another time he choked me and struck me in the side with his fist,at another time he beat me with a st stick and the signs of the lick made scars on my arm which I have to this day, this violence by my husband upon my person was attended with danger of my life and health and for this cause I left him, I had also reasonable apprehension that he would continue this violence upon my person,as he had drawn a knife upon me a number of times,

Letha Whitehurst

Letter Christmast

as

Letter Christmast

Amendment to Engraving

Printed July 16th 1832  
J. P. H. [unclear]  
[unclear]

No.1051.....

Page.....

THE STATE OF ALABAMA  
BALDWIN COUNTY  
CIRCUIT COURT, IN EQUITY

Letha Whitehurst

vs.

Sarah Catrett,

REQUEST FOR DECREE IN  
VACATION

FILED July 21st, 1932 192

*DW Ruler*

Register

RECORDED IN ..... RECORD

VOL. .... PAGE.....

Register

RECORDED

Letter Whitcomb

no  
Louis Whitcomb

Filed June 21, 1932

J. P. Richardson  
Register



1937  
Adkins  
40  
(original)

Serve on \_\_\_\_\_  
Circuit Court of Baldwin County  
In Equity.

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

**SUMMONS**

LEENA WHITEHURST  
VS.

LOUIS WHITEHURST

~~Toward in my County after this last search and inquiry~~  
~~W. H. JACKSON, Jr., Sheriff~~

~~W. H. JACKSON, Jr., Sheriff~~  
S. C. JENKINS  
Solicitor for Complainant.

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

506 Selma St,  
Moriae, Ala

**The State of Alabama,  
BALDWIN COUNTY.**

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

day of \_\_\_\_\_ 1937

Sheriff.

Executed this 18 day of

June 1937

by leaving a copy of the within Summons with

Louis Whitehurst

Defendant.

W. H. JACKSON, Jr., Sheriff.

By A. O. Jenkins  
Deputy Sheriff.

No. 1051.

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

Letha Whitehurst

VS

Louis Whitehurst

NOTE OF TESTIMONY

Filed in Open Court this 21st  
day of July 1932. 192

*[Handwritten Signature]*

Register

*W*  
*Original*

Serve on \_\_\_\_\_

Circuit Court of Baldwin County  
In Equity.

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

**SUMMONS**

ON AMENDED COMPLAINT.

Letha Whitehurst

vs.

Louis Whitehurst,

506 Selma St

Mobile Alabama.

S.O. Jenkins,

Solicitor for Complainant.

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

The State of Alabama,  
BALDWIN COUNTY.

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

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

Sheriff.

Executed this 19 day of

July 1932

by leaving a copy of the within Summons with

*Louis Whitehurst*  
Defendant.

*A. D. Williams, Jr.*  
Sheriff.

By *A. D. Farmer*  
Deputy Sheriff.

John Brewster

05-

David Brewster

Answer of Dgt

Recd Aug 21/88  
D. Brewster  
Brewster

BILL OF COMPLAINT.

ORIGINAL.

LETHA WHITEHURST,


Complainant,

vs.

LOUIS WHITEHURST,

Respondent.

FILED June 4, 1932.

  
REGISTER.

S. C. JENKINS,

Solicitor for com-  
plainant.

SARAH CATRETT, WHO HAVING BEEN DULY SWORN, DOTH DEPOSE AND

SAY AS FOLLOWS:-

My name is Sarah Catrett. I know Louis Whitehurst and Letha

Whitehurst. I have known Letha Whitehurst all of her life. She

is my daughter. They were legally married at Prichard, Alabama,

Mobile County, on February 22, 1930 and they lived together as

husband and wife until June 1, 1931, when on account of cruelty

and bad conduct she had to leave him and went to Bay Minette

where she has since lived with her brother, Edward Faulk, where

she has since resided, except when she was off working for her

living. While Letha Whitehurst and Louis Whitehurst were living

as husband and wife I visited them often and was in their home,

and at times, when he was drunk, he would beat her, and he stayed

most of the time when I was there, and I have seen him beat her

and mistreat her most cruelly. He would not work at steady work

and when at not at work he did not support his wife and there were

times when she actually suffered for want of something to eat and

he has not supported her in any way, shape or form since June,

1931. They are both residents of the State of Alabama, and both

are over the age of eighteen years. Louis Whitehurst resides at

Mobile, Alabama, temporarily at this time, living at 506 Selma St., and Letha

Whitehurst is now and has been for the past three years a resident

of Baldwin County, Alabama, except when she went to live with her

husband in Mobile County, Alabama. After she left her husband

in June, 1931, she has resided in Bay Minette, Alabama and claims

that as her home except when she is off working for her living.

TOM REED, WHO HAVING BEEN DULY SWORN, DOTH DEPOSE AND SAY

AS FOLLOWS:-

My name is Tom Reed. I live in Pensacola, Florida. I know

Louis Whitehurst and Letha Whitehurst. I have known Louis White-

hurst for about fifteen years. I know when he married, about

February, 1930 and I knew him while he was married and since he

has been married. I have worked and lived at Prichard, Alabama.

I was living there about June 1, 1931. I was often in their home

and while there I have seen him drunk and I have seen him a num-

ber of times beat his wife, Letha Whitehurst, and he would curse

and beat her also when he was drunk. He never would work steady

and would not keep a job when he could get it, and he became

*Letha Whitehurst*

addicted to the habit of staying drunk most of the time. I have seen him at times give her whippings and beat her most cruelly. Most of the time when he whipped her and beat her he would be drunk. I know that on about June 1, 1931 that his conduct and treatment of his wife, Letha Whitehurst, was so mean and cruel, that she had to leave him, and went to Bay Minette to live with her uncle, Edward Faulk, where she has resided ever since except when she is off to work. They are both over the age of eighteen years and both residents of the State of Alabama; both residing in Alabama, all of their lives.

Tom Reed

Sarah Catrett deposes and says:

My name is Sarah Catrett, I am the mother of the Complainant Letha Whitehurst, I was present at the time in Prichard, Ala when Louis Whitehurst drew his knife on Letha Whitehurst and threatened to kill her this was prior to the time his wife left him and went to live with her Uncle in Bay Minette Ala this was prior to June 1st 1931,

I know of my own knowledge that Louis Whitehurst made actual violence on the person of Letha Whitehurst I saw him choke her at one time and again I saw him beat her with a stick, doing her great bodily harm to the extent of endangering her life and health, After my daughter married ~~my daughter~~ Louis Whitehurst and while they lived at Prichard Ala I visited them often sometime twice a week .

After he married my daughter he became addicted to habitual drunkenness, and when he got drunk he would treat ~~her~~ most shamefully and cruelly by choking her and striking her with his fist I have seen him do these things several times, the acts of actual violence upon the person of his wife Letha Whitehurst endangered both her life and her health, ~~this~~ his mis-conduct and cruelty forced her to leave him ~~in~~ this was about June 1st 1931, at which time she returned to Bay Minette and resided with her Uncle Edward Faulk.

Both Letha Whitehurst and Louis Whitehurst were raised in Baldwin County, and bon a fide residents of Baldwin County except when they both went away to get work Louis Whitehurst is in Prichard at work now he is 21 years of age and Letha Whitehurst is 19 years of age ,

*Sarah Catrett*