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|-------------------|---|----------------------|
| Archie McCullough |) | In the Circuit Court |
| Complainant |) | |
| |) | Baldwin County |
| vs |) | |
| |) | Alabama |
| Rosie McCullough |) | |
| Respondent |) | In Equity |

To the Honorable Frances W. Hare, Judge of said Court, sitting in equity:

Comes Your Complainant, Archie McCullough, and respectfully exhibits this, his Bill of Complaint and shows unto Your Honor as follows:

First: Complainant and Respondent intermarried on February 22nd 1922 at Meadeville, Mississippi, and both parties hereto are past the age of Twenty One Years.

Second: For More than Two Years past, Complainant has been a resident of the State of Alabama, residing presently in Baldwin County therein.

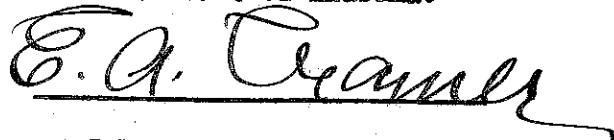
Third: On July 5th 1942, Respondent voluntarily abandoned Complainant without just cause therefore and has continued said abandonment with total neglect of the marital covenant on her part to be performed.

The premises considered, Complainant prays that Your Honor grant all appropriate and legal process and that the same be directed to said Rosie McCullough demanding her to personally appear before this Honorable Court within the time required by law and then and there to answer fully and completely the several paragraphs of this Bill of Complaint and that she be required to abide and obey all decrees and ~~orders~~ orders of this Court which to Your Honor may seem meet and proper.

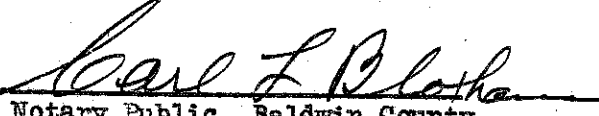
Complainant further prays upon a hearing of this cause that a decree be rendered forever divorcing Complainant from said Rosie McCullough and granting Complainant such other, further and different relief as may be or appear proper in the premises.


 Solicitor for Complainant.

State of Alabama, Baldwin County,
 Personally appeared E. A. Cramer, who, being duly sworn, deposes and says:
 That he is attorney for Archie McCullough in a suit of divorce against Rosie McCullough; that he believes, upon information and investigation, that said Rosie McCullough is past the age of Twenty One Years and that said Rosie McCullough is presently a non-resident of the State of Alabama.



Subscribed and sworn to this 11th day of July, A. D. 1944.


 Notary Public, Baldwin County
 Alabama.

Seal

PINKIE E. WHITE,

Complainant,

VS.

WILLIS L. WHITE,

Respondent.

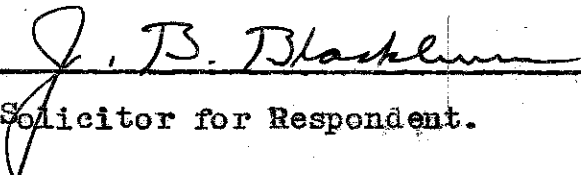
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY.

ANSWER

Now comes the Respondent and for answer to the original and amended Bills of Complaint filed against him in this cause says:

1. He consents and agrees that a Commissioner be appointed, testimony taken and this cause submitted for Final Decree without notice to him, which notice is hereby expressly waived.

2. Respondent denies each and all of the other allegations of the original and amended Bills of Complaint and demands strict proof of same.


Solicitor for Respondent.

PINKIE E. WHITE,
Complainant,

Vs.

WILLIS J. WHITE,
Respondent.

)
) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA.
)
) IN EQUITY.
)

TO THE HONORABLE THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY, AND THE HON. F. W. HARE, JUDGE THEREOF:-

Comes Your Complainant, Pinkie E. White, and amends her Bill of Complaint heretofore filed in said cause by withdrawing said Complaint and substituting in lieu thereof, the following Complaint, viz:-

FIRST:

That Both the Complainant and the Respondent are over the age of twenty-one years and are resident citizens of Baldwin County, Alabama, residing at Fairhope, Alabama, and have been such residents for more than ten years last past.

SECOND:

Your Complainant further shows unto your Honor that she married the Respondent on October 29, 1922 and lived with him as his wife until on account of the matters and facts herein set out she was compelled to leave him and live separate and apart from him; that on to-wit, June 12, 1944 the conduct of the Respondent, Willis L. White, was such as to cause her to believe and she does believe that if she continued to live with him that he would commit actual violence on her person attended with danger to her life or health. Your Complainant is afraid of the Respondent, Willis L. White, and has reasonable apprehension from his conduct that he will commit actual violence on her person attended with danger to her life or health. On account of such belief your Complainant left the Respondent on June 12, 1944 and has not lived with him as man and wife since that time.

PRAYER FOR PROCESS AND RELIEF.

The premises considered the Complainant prays that your Honor will cause the usual writ of process to issue to the said Willis L. White, making him a party defendant to this Bill of Com-

plaint and requiring him to plead, answer or demur to the same within the time prescribed by law and the rules of this Honorable Court and that upon a final hearing of said cause that your Honor will decree that the bonds of matrimony heretofore existing between your Complainant and the Respondent be dissolved. Your Complainant prays for such other, further and different and general relief as in Equity may seem just and meet and your Complainant will ever pray.

Purkie E. White
Complainant

HYBART & CHASON
Solicitors for Complainant.

TESTIMONY OF MARGARET CROZIER

My name is Margaret Crozier ; I am 17 years of age and a resident citizen of Fairhope in Baldwin County, Alabama; I am personally acquainted with Pinkie E. White who is Complainant, and Willis L. White, who is Respondent in that suit for divorce filed in the Circuit Court of Baldwin County, Alabama, in Equity; Both the Complainant and the Respondent are over twenty-one years of age and are resident citizens of Fairhope in Baldwin County, Alabama, and both of them have resided there for more than ten years last past. I do not remember exactly when they married but they have been married for many years. I have visited in the home with them quite a bit and have had an opportunity to observe the conduct of Willis L. White. His conduct was such as to cause Pinkie E. White to believe that if she continued to live with him that he would commit actual violence on her person attended with danger to her life or health. I think that she was entirely justified in leaving him and living separate and apart from him.

Margaret Crozier

TESTIMONY OF PINKIE E. WHITE.

My name is Pinkie E. White; I am over the age of twenty-one years and am a resident citizen of Fairhope in Baldwin County, Alabama, and have been such a resident citizen for more than ten years last past. I am the Complainant in that suit for divorce brought in the Circuit Court of Baldwin County, Alabama, in Equity, in which Willis L. White is Respondent. The said Willis L. White is a resident citizen of Fairhope, Alabama, and has resided there for more than ten years last past. I married the said Willis L. White on October 29, 1922 and lived with him as his wife until I was compelled to leave him and live separate and apart from ~~him~~ ^{him} on to-wit, June 12, 1944 the conduct of the said Willis L. White was such as to cause me to believe and I do believe that if I had continued to live with him as his wife, that he would commit actual violence on my person attended with danger to my life or health. I am afraid of the said Willis L. White and have reasonable apprehension from his conduct that he will commit actual violence on my person attended with danger to my life or health. I have not lived with him as his wife since June 12, 1944.

Pinkie E. White

THE STATE OF ALABAMA }
Baldwin County

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

PINKIE E. WHITE, COMPLAINANT

vs.

WILLIS L. WHITE, RESPONDENT

I, ERIN S. MONTGOMERY

as ~~Register and~~ Commissioner

have called and caused to come before me Margaret Crozier

and

Pinkie E. White

witness ~~es~~ named in the requirement for Oral Examination, on the 26th day of July

1944, at the office of HYBART & CHASON

in Ray Minette, Alabama, and having first sworn said witness ~~es~~ to speak the

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

and Pinkie E. White doth depose and say as follows:

PINKIE E. WHITE,

Complainant,

VS.

WILLIS L. WHITE,

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, _____

Waiver and Testimony of Margaret Crozier and Pinkie E. White

and in behalf of Defendant upon Answer

Robert Thayer
Register.
Robert Thayer
Declarator for Complainant

RECORDED

No. _____

The State of Alabama,
BALDWIN COUNTY

IN EQUITY
CIRCUIT COURT OF BALDWIN COUNTY

PINKIE E. WHITE,

Complainant,

VS.

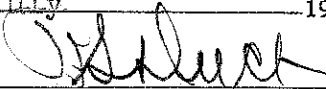
WILLIS L. WHITE,

Respondent.

NOTE OF TESTIMONY

Filed in Open Court this 26th

day of July 1944.



Register.