

herein prayed for, may it please your Honor to cause the State's writ of subpoena to be issued, directed to the said William L. Holloway, commanding him to answer, plead or demur to this bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from said respondent, granting the complainant the right to remarry, and granting the complainant the right to resume her maiden name; and that your Honor will grant such other, further and different relief as unto your Honor may seem just and proper, and your complainant will ever pray.

Arthur C. Epperson
Solicitor for Complainant.

MARIE HOLLOWAY
Complainant.

VS.

WILLIAM L. HOLLOWAY
Respondent.

CIRCUIT COURT IN EQUITY

BALDWIN COUNTY

ALABAMA

To the Honorable ^{Referee} J. Mashburn Jr., Judge of the Circuit
Court of Baldwin County,

Sitting in Equity:

Your complainant MARIE HOLLOWAY, respectfully represents
and shows unto your Honor:

1. That complainant is a married woman over the age of
eighteen years and is a resident of said State and County and
has been a bona fide resident of said State for more than two
years next preceding the filing of this bill of complaint; that
WILLIAM L. HOLLOWAY is over the age of twenty-one years and a
non-resident of the State of Alabama, his last known address
being, 8287 S.U. Hdg. & Hdg. Bldg., A.C.F. Envestok Atoll, A.P.O.
#187 1/2 Postmaster, San Francisco, Calif.

2. That your complainant and respondent were lawfully
married on or about, to-wit, January 21, 1947, at Lucedale, Miss.

3. Your complainant further avers and alleges that said
respondent has been guilty of adultery with divers parties and
persons whose names to your complainant are unknown.

4. Your complainant avers and charges that the said res-
pondent did on or about the 4th day of April, 1947, and many
times subsequent thereto assault, beat, hit and strike complain-
ant; that said respondent has committed actual violence on her
person attended with danger to her health or life; complainant
avers and charges that respondent has made numerous threats of
doing her physical harm and from his manner and conduct toward
her, she is reasonably convinced that he will commit an actual
violence upon her person, attended with danger to her life or
health.

The premises considered, your complainant makes the said
WILLIAM L. HOLLOWAY a party respondent to this bill of com-
plaint, and in order that complainant may have the relief

heresin prayed for, may it please your Honor to cause the State's writ of subpoena to be issued, directed to the said William L. Holloway, commanding him to answer, plead or demur to this bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from said respondent, granting the complainant the right to remarry, and granting the complainant the right to resume her maiden name; and that your Honor will grant such other, further and different relief as unto your Honor may seem just and proper, and your complainant will ever pray.

Arthur C. Epperson
Solicitor for Complainant.

MARIE HOLLOWAY
Complainant.

VS.

WILLIAM L. HOLLOWAY
Respondent.

CIRCUIT COURT IN EQUITY

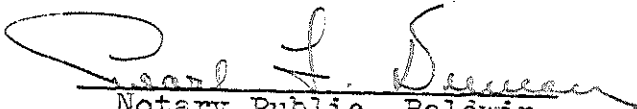
BALDWIN COUNTY

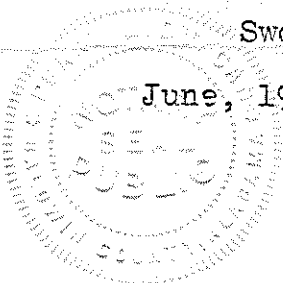
ALABAMA

Personally appeared before me, Pearl Duncan, Notary Public, Arthur C. Epperson, solicitor of record for complainant in the above entitled cause, who being duly sworn, deposes and says that he is informed and verily believes that William L. Holloway, the respondent in the above styled cause, is a nonresident of Alabama, and whose residence and post office address is, 8287 S.U. Hdq. & Hdq. Det., A.G.F. Eniveetok Atoll, A.P.O. # 187 % Postmaster, San Francisco, Calif., and that said respondent is in the belief of affiant over twenty-one years of age.


Arthur C. Epperson

Sworn to and subscribed before me, this the 28 Day of
June, 1949.


Notary Public, Baldwin
County, State of Alabama.



MARIE HOLLOWAY
Complainant.

VS.

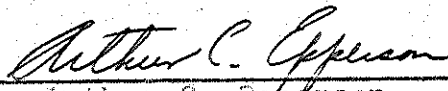
WILLIAM L. HOLLOWAY
Respondent.

CIRCUIT COURT IN EQUITY


BALDWIN COUNTY

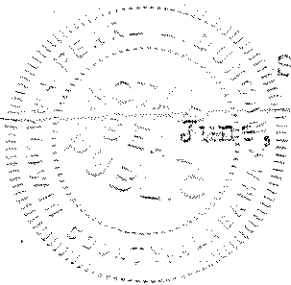
ALABAMA

Personally appeared before me, Pearl Duncan, Notary Public, Arthur C. Epperson, solicitor of record for complainant in the above entitled cause, who being duly sworn, deposes and says that he is informed and verily believes that William L. Holloway, the respondent in the above styled cause, is a nonresident of Alabama, and whose residence and post office address is, 8287 S.U. Hdg. & Hdg. Det., A.G.F. Eniwetok Atoll, A.P.O. # 187 1/2 Postmaster, San Francisco, Calif., and that said respondent is in the belief of affiant over twenty-one years of age.


Arthur C. Epperson

Sworn to and subscribed before me, this the 28 Day of June, 1949.


Notary Public, Baldwin
County, State of Alabama.



MARIE HOLLOWAY
Complainant.

VS.

WILLIAM L. HOLLOWAY
Respondent.

CIRCUIT COURT IN EQUITY

BALDWIN COUNTY

ALABAMA

Now comes the Respondent, WILLIAM L. HOLLOWAY, and for answer to the bill of complaint herein says as follows:

1. He denies each and ever material allegation contained in said bill of complaint and demands strict proof of same.

2. The respondent hereby waives notice of taking of testimony in this cause, notice of submitting said cause for final decree, and such other, further, or different notice to which he might be otherwise entitled.

J. C. Petty
Witness

William L. Holloway
Respondent.

Catherine Mason
Witness

MARIE HOLLOWAY
Complainant.

VS .

WILLIAM L. HOLLOWAY
Respondent.

ANSWER AND WAIVER

Filed 8-4-49
Alicia J. Welch
Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2310

-----TERM, 194-----

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You Are Hereby Commanded to Summon

William L. Holloway

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in

the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

William L. Holloway

, Defendant.---

by

, Plaintiff.---

Witness my hand this

29th

day of

June

1944

W. J. Newby, Clerk.

No. _____

Page - - - - -

THE STATE of ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

Plaintiffs
vs.

Defendants

SUMMONS and COMPLAINT

Filed _____, 194_____

Clerk

Plaintiff's Attorney

Defendant's Attorney

Moore Printing Co.

Defendant lives at

RECEIVED IN OFFICE

194_

_____, Sheriff

I have executed this summons

this _____, 194____
by leaving a copy with _____

Sheriff

Deputy Sheriff

MARIE HOLLOWAY
Complainant.

VS.

WILLIAM L. HOLLOWAY
Respondent.

CIRCUIT COURT IN EQUITY

BALDWIN COUNTY

ALABAMA

To the Honorable ~~Telefair~~ J. Mashburn Jr., Judge of the Circuit
Court of Baldwin County,

Sitting in Equity:

Your complainant MARIE HOLLOWAY, respectfully represents
and shows unto your Honor:

1. That complainant is a married woman over the age of
eighteen years and is a resident of said State and County and
has been a bona fide resident of said State for more than two
years next preceding the filing of this bill of complaint; that
WILLIAM L. HOLLOWAY is over the age of twenty-one years and a
non-resident of the State of Alabama, his last known address
being, 8287 S.U. Hdq. & Hdq. Det., A.G.F. Eniveetok Atoll, A.P.O.
#187 % Postmaster, San Francisco, Calif.

2. That your complainant and respondent were lawfully
married on or about, to-wit, January 21, 1947, at Lucedale, Miss.

3. Your complainant further avers and alleges that said
respondent has been guilty of adultery with divers parties and
persons whose names to your complainant are unknown.

4. Your complainant avers and charges that the said res-
pondent did on or about the 4th day of April, 1947, and many
times subsequent thereto assault, beat, hit and strike complain-
ant; that said respondent has committed actual violence on her
person attended with danger to her health or life; complainant
avers and charges that respondent has made numerous threats of
doing her physical harm and from his manner and conduct toward
her, she is reasonably convinced that he will commit an actual
violence upon her person, attended with danger to her life or
health.

The premises considered, your complainant makes the said
WILLIAM L. HOLLOWAY a party respondent to this bill of com-
plaint, and in order that complainant may have the relief

herein prayed for, may it please your Honor to cause the State's writ of subpoena to be issued, directed to the said William L. Holloway, commanding him to answer, plead or demur to this bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from said respondent, granting the complainant the right to remarry, and granting ~~the complainant the right to resume her maiden name;~~ and that your Honor will grant such other, further and different relief as unto your Honor may seem just and proper, and your complainant will ever pray.

Arthur C. Epperson
Solicitor for Complainant.

No 2310

Marie Holloway

VS.

William L. Holloway

Sum & Complaint

Filed

FILED

JUN 29 1949

ALICE J. DUCK, Register

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Catherine Mason, Foley, Alabama

KNOW YE: that we, having full faith in your prudence and competency, have appointed you
Commissioner, and by these presents do authorize you, at such time and place as you may appoint,
to call before you and examine Marie Holloway

and Lucy Mae Dale

as witnesses in behalf of Marie Holloway in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein

Marie Holloway, Complainant
and

William L. Holloway Respondent

on oath, to be by you administered, upon August 2, 1949
to take and certify the deposition of the witness and return the same to our Court, with all
convenient speed, under your hand.

Witness 1st day of August, 1949

Alice J. Welch

Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

MARIE HOLLOWAY

Complainant

vs.

WILLIAM L. HOLLOWAY

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Catherine Mason

WITNESSES:

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

MARIE HOLLOWAY

Complainant

VS.

WILLIAM L. HOLLOWAY

Respondent

I, Catherine Mason

as Register and Commissioner

have called and caused to come before me Lucy Mae Dale

witness named in the Requirement for Oral Examination, on the 2nd day of August 1949, at the office of Catherine Mason in Foley, Alabama, and having first sworn said Witness to speak the truth, the whole truth, and nothing but the truth, the said Lucy Mae Dale

doth depose and say as follows:

My name is Lucy Mae Dale and I live at Foley, Alabama.

I do not remember exactly what date it was but I do remember when Marie came home. She came running into the house all out of breath, white as a sheet and acting scared to death. It scared me so I couldn't imagine what had happened. The only thing I could get out of her at first was that it was something to do with Bill. After while I got her calmed down enough that she told me what had happened. She told me that she had gone to the show that afternoon with a girl friend and that Bill had gotten home early and went into the show after her. Marie said that they got into an argument at home and he hit her and knocked her down and her head hit a small table. There was a big knot on the back side of her head. She told me that she was afraid he might kill her if she lived with him and that she would have to do just as he wanted her to all the time. She said that when she was lying on the floor he cussed her and her girl friend and she was too scared to move that when he went to the bathroom she jumped up and went over to her neighbors who brought her home. I went over to Marie's apartment with one of my sons and got her clothes. Marie would not go back and live with him because she was afraid of him. I wouldn't have either.

Mrs Lucy Mae Dale

ORAL EXAMINATION.

I, Catherine Mason, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness and read over to witness and signed the same in the presence of myself Catherine Mason at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness or had proom 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 2nd day of August, 1949

Catherine Mason (L. S.)

NO. PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

MARIE HOLLOWAY

vs. Complainant

WILLIAM L. HOLLOWAY

Respondent.

Oral Deposition

Filed 1, 1949

FILED

Register.

AUG
Recorded in 1949

Alley & Wilk, Register

Vol. Page Record

 , Register.

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

MARIE HOLLOWAY

Complainant

VS.

WILLIAM L. HOLLOWAY

Respondent

I, Catherine Mason

as Register and Commissioner

have called and caused to come before me Marie Holloway

witness named in the Requirement for Oral Examination, on the 2nd day of August
1949, at the office of Catherine Mason

in Foley, Alabama, and having first sworn said Witness to speak the
truth, the whole truth, and nothing but the truth, the said Marie Holloway

doth depose and say as follows:

My name is Marie Holloway and I have always lived at Foley, Ala.

My husband was always jealous of me and did not even want me to work or have anything to do with any of my girl friends. It was on the afternoon of April 4, 1947, I went to the show with a girl friend because I didn't have anything to do and he wasn't supposed to be home until 6:00 O'Clock. He came home at 4:00 O'Clock instead and I was not home. He was mad because I went to the show and wasn't at home when he got there. He came into the show after me and we went home to our apartment. He wanted to know why I went to the show and I told him I didn't have anything to do and that I was sick and tired of staying at home. He told me that I better not go to the show without him any more even with those girls. I said that I would if I wanted to. I got up and told him that I was going out to Mother's and he told me I wasn't and I started to the door and he threw a mirror against the wall to scare me. He grabbed me by the hair and jerked me back into the room and said I wasn't going anyplace that I was going to stay there from now on and be there when he got home. He was shaking me so I started scratching him and he hit me with his fist and knocked me in the corner and I bumped my head on the table and nearly knocked me out. I was dazed and was so afraid that he would hurt me seriously that I did not get up until he quit cussing and went into the bathroom. I jumped up and ran out of the house and got a neighbor to take me home. I was afraid to go back and live with him because he gets so mad at the least little thing and doesn't know what he is doing and he might hurt me so seriously that I would never get over it. Of course I haven't lived with him since.

Bill and I were married on January 21, 1947 at Lucedale, Miss.

Marie Holloway

ORAL EXAMINATION.

I, Catherine Mason, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness _____ and read over to _____ and _____ signed the same in the presence of myself Catherine Mason

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness _____ or had proom 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 2nd day of August, 1949

Catherine Mason (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

MARIE HOLLOWAY

vs. Complainant

WILLIAM L. HOLLOWAY
Respondent.

Oral Deposition

Filed _____, 1949

Register.

Recorded in

Record

Vol. _____

FILED
AUG 12 1949
Page 0

Attest J. B. B. Register.

Attest, Register

The State of Alabama, Baldwin County

Circuit Court, In Equity

MARIE HOLLOWAY, Complainant

vs.

WILLIAM L. HOLLOWAY, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree and Waiver~~ on Answer and Waiver and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and that the said Marie Holloway is forever divorced from the

said William L. Holloway for and on account of

C R U E L T Y

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 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 Marie Holloway the Complainant pay the cost herein to be taxed, for which execution may issue.

This 15th day of August, 1949.

J. Fair J. Masliberry
Judge Circuit Court, In Equity.

I, _____ Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the _____ day of _____, 19_____

Register of Circuit Court, In Equity.

No. 2510 Page _____

The State of Alabama
Baldwin County

In Circuit Court, In Equity

MARIE HOLLOWAY

Complainant
vs.

WILLIAM L. HOLLOWAY

Respondent

DIVORCE DECREE

MARIE HOLLOWAY
Complainant.

VS.

WILLIAM L. HOLLOWAY
Respondent.

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

This cause being submitted for final decree,

Complainant, being called, offers the following testimony, to-

wit:

- 1st. Original Bill of Complaint.
- 2nd. Testimony of Marie Holloway.
- 3rd. Testimony of Lucy Mae Dale
- 4th. Answer and Waiver of the Defendant.

I hereby certify that the above note of testimony is correct,
this 11th day of August, A. D., 1949.

Wesley J. French,
Register.

Arthur C. Epperson,
Solicitor for Complainant.

Solicitor for Defendant.

MARIE HOLLOWAY
Complainant.

VS.

WILLIAM L. HOLLOWAY
Respondent.

NOTE OF SUBMISSION

FILED
AUG 12 1949
ALICE J. DUCK, Register

2310