

MARY LAWSON WASHINGTON,	(	IN THE CIRCUIT COURT OF
Complainant,	)	
	(	BALDWIN COUNTY, ALABAMA.
-vs-	)	
	(	IN EQUITY.
HOLLIS WASHINGTON,	)	
Defendant.	(	No. 841.

This cause coming on to be heard at this Term, was submitted upon the bill of complaint, answer of the Defendant, agreement as to reference and attorneys fee by and between the parties to this cause, 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 the Complainant is forever divorced from the Defendant on the grounds of voluntarily abandonment.

IT IS FURTHER ORDERED that the said Mary Lawson Washington be and she is hereby permitted to again contract marriage upon the payment of the cost of court in this cause.

IT IS FURTHER ORDERED that the said Hollis Washington pay the cost 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 Mary Lawson Washington.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Mary Lawson Washington shall not again marry except to said Hollis Washington until after sixty days from this date and that if an appeal is taken within sixty days she shall not marry again except to said Hollis Washington during the said pendency of appeal.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Hollis Washington pay to the said Mary Lawson Washington the sum of Ten Dollars per month as permanent alimony.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Hollis Washington pay to the said Mary Lawson Washington the sum of Seventy-Five Dollars as attorneys fee in this cause.

This the 4th day of February, 1930.

F. W. Hare  
Judge of the Circuit Court of  
Baldwin County, Alabama.

-----  
STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

I, T. W. Richerson, 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 4th day of February, 1930, in the cause of Mary Lawson Washington, Complainant, vs. Hollis Washington, Defendant, as appears of record in said Court.

Witness my hand and the seal of said Court, this the 4th day of March, 1930.

\_\_\_\_\_  
Register.

MARY LAWSON WASHINGTON

Complainant

VS.

HOLLIS WASHINGTON

Respondent

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

On reference before T. W. Richerson in the matter of allowance of temporary alimony and attorneys' fees.

Interrogatories addressed to Hollis Washington, the defendant, who resides in Montgomery, Alabama:

Interrogatory One: State if you are the defendant in this cause, and if you are the husband of Mary Lawson Washington, who lives in Baldwin County, Alabama. State when you married said Mary Lawson Washington, how long you lived with her, and if you left her, state when and under what circumstances. State if you have any children. State if you have since leaving your wife contributed to the support of herself or child, and if so, when and to what extent. What is the financial condition of your said wife, Mary Lawson Washington, and state in what way she lives and supports her child. State how old you are, if you are in good health, and if you have any trade, and if so what it is. State what business you are now engaged in, and what wages or salary you earn. State if you are a cook by trade, and what salary you can earn in that occupation.

Interrogatory Two: State under what circumstances you left your wife and when. State if you worked at the State Normal Schbol as a cook, and if so when and for how long, and what your compensation therefor was. State fully your earning capacity, and what it costs you to live. State what allowance out of your earnings it is possible for you to make to assist in the support of your wife and child.

*Hill, Hill, White, Thomas & Rivers*  
*Norborne Stone*

Respondent suggests Mrs. Ezelle L. Tavel, 107½ Washington Street, Montgomery, Ala. as a suitable person to take the testimony of the above witness.

*Hill, Hill, White, Thomas & Rivers*  
*Norborne Stone*

The State of Alabama, {  
Baldwin County

## CIRCUIT COURT

To Mrs. Ezelle L. Tavel, 107 $\frac{1}{2}$  Washington Street, Montgomery, 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 Mary Lawson Washington

as witnesses in behalf of Complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein Mary Lawson Washington

Complainant  
and Hollis Washington

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

Witness 7th day of December, 1929

COMMISSIONER'S FEE, \$ 2.50

WITNESS' FEES, \$ \_\_\_\_\_

T. W. Beckman  
REGISTER

MARY LAWSON WASHINGTON

Complainant

VS.

HOLLIS WASHINGTON

Respondent

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

Testimony of Hollis Washington taken under and by virtue of a commission issued out of the Circuit Court of Baldwin County, Alabama, In Equity, in a cause therein pending wherein Mary Lawson Washington is complainant and Hollis Washington is defendant.

Hollis Washington, being first duly sworn to speak the truth, the whole truth and nothing but the truth, doth depose and say as follows:

To the first interrogatory he says: I am the defendant in this cause and am the husband of Mary Lawson Washington, who lives in Baldwin County, Alabama. I married Mary Lawson Washington during the year 1925 and lived with her about a month. I had had improper relations with her before marrying her and married her on the insistence of her family. She really cared nothing for me or I for her. She did not want to live with me and refused to try to be a good and faithful wife to me. I was living with her at the home of her parents and she told me to leave. She insisted on my leaving and I did leave about a month after we were married and have not lived with her since. I then lived in Baldwin County, Alabama, for several months and came to Montgomery in the Fall of 1926. When I first came to Montgomery I had a pretty good job and sent her money regularly. I only had this job for about six or eight months and was out of work entirely for several months. I am now making \$9.00 per week and have been making this for over a year and find it hardly enough to live on. The expenses of living here are heavy. Mary Lawson Washington is an educated woman and at one time taught school and may be doing so now, so far as I know. Her father and mother own their own home and some land and are very well to do and she lives with them. She is intelligent and has good health and is a good cook and a good house servant.

I can cook pretty well, having picked it up, but am not a first-class cook and have not been able to get any work as a cook here in Montgomery. I do pretty well for the country but not well enough for the city.

In answer to Interrogatory Two he says: Have just given the circumstances under which I left my wife. I did work for the State Normal School of this city for about eight months as a cook, and they paid me \$60.00 per month. They let me go and had the cooking done by the students. I have never been able to get as good a job since. I only make \$9.00 per week and it takes every cent of this for me to live and I am in debt besides.

Halley Washington

STATE OF ALABAMA }  
MONTGOMERY COUNTY }

I, Mrs. Ezelle L. Tavel, Commissioner, do hereby certify that depositions of Hollis Washington were taken before me on the 11th day of December, 1929; that I have personal knowledge of said witnesses, and that I am neither of kin nor interested in said case in any way, nor am I counsellor in said cause.

WITNESS my hand and seal this the 11th day of December, A. D. 1929.

(Mrs.) Ezelle L. Tavel (D.S.)  
Commissioner

Deposition of  
Hollis Washington

Filed Dec 12/1929  
T. W. Pickens  
Register



NO. \_\_\_\_\_

**The State of Alabama**  
**BALDWIN COUNTY**  
**CIRCUIT COURT**

Mary Lawson Washington

Complainant

vs.

Hollis Washington

Defendant

**COMMISSION TO TAKE DEPOSITION**

**COMMISSIONER:**

Mrs. Ezelle Tavel,  
107½ Washington Street,  
Montgomery, Alabama.

**WITNESSES:**

Mary Lawson Washington

We hereby waive service of written Cross  
interrogatories and agree that  
Commission immediately be issued  
and waive right to file Cross  
interrogatories.

11/2/29

Perbe & Hall  
Sol for Camp

841

CERTIFIED COPY OF  
DECREE.

Mary Lawson Washington,  
Complainant,

-vs-

Hollis Washington,  
Defendant.

841

CERTIFIED COPY OF DECREE

Mary Lawson Washington,  
Complainant,

-vs-

Hollis Washington,  
Defendant.

8581 NOTE OF TESTIMONY

Mary Lawson Washington

vs.

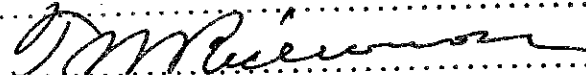
Hollis Washington

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 of the Defendant, testimony on behalf of the Complainant and  
defendant, agreement between solicitors of record for respective  
parties dated June 24th, 1929; Report of Register as to alimony;  
waiver and agreement of solicitors for defendant;  
confirmation of report of reference;

~~CONFIDENTIAL~~

  
Register.

MARY LAWSON WASHINGTON

VS.

HOLLIS WASHINGTON

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

IN EQUITY

Comes the defendant and for answer to the complaint  
denies each and every allegation thereof and demands strict  
proof of the same.

Hill, Hill, Whiting, Thomas & Rives.

Attorneys for Defendant

4

RECORDED

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

VS

NOTE OF TESTIMONY

Filed in Open Court this 4  
day of Feb 1930

W. B. Rimmer

Register

Mary Braden  
B. 1888  
Hollie Braden

RECORDED

Filed May 22/1929  
T. W. McCreary  
Register



The State of Alabama, } Circuit Court of Baldwin County, Alabama  
 Baldwin County. (In Equity.)

Mary Lawson Washington ..... Complainant.

VS.

Hollis Washington ..... Respondent.

I, T. W. Richerson,

as Register and Commissioner

have called and caused to come before me Mary Lawson Washington.

James Quinney, Cornelia Quinney Leslie Yelling;

witnesses named in the Requirement for Oral Examination, on the 25th day of June

1929, at the office of T. W. Richerson,

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

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

doth depose and say as follows:

Mary Lawson Washington, the complainant who being duly sworn .....  
 testified as follows:-

My name is Mary Lawson Washington. I am a bona fide resident of Baldwin County, Alabama, and have been for more than three years, next preceeding the filing of the Bill of Complaint in this cause. I am over twenty-one years of age. Hollis Washington is over twenty-one years of age, and is a resident of Daphne, Baldwin County, Alabama. Hollis Washington and I are husband and wife, having intermarried at Bay Minette, Alabama, on June 15, 1925. We lived together at Daphne, in Baldwin County, Alabama, as husband and wife, until September, 1926. IN September, 1926, Hollis Washington, the defendant, voluntarily, and for no reason on my part went away and left me, and has remained away voluntarily and continuously since that time. We were living at Daphne, in Baldwin County, Alabama, when the defendant, Hollis Washington, went away. There was one child born of said marriage between me and Hollis Washington, Edwina Washington, a girl now two years old. The child has been in my custody and care all her life. The defendant, Hollis Washington, is not a fit and proper person to have the custody and control of the child, Edwina Washington, and I feel that under the conditions

that I am the proper person to have the care and custody of her...

I have absolutely no money with which to prosecute this suit, and have absolutely no property of any kind, and have no means of supporting myself and my child, Edwina Washington, except by my menial labor, and am forced to depend for my support upon my father and brother.

The defendant, Hollis Washington, is an able-bodied man about twenty-eight years of age, and while living with me, he followed the trade of a cook, at a salary of Sixty Dollars per month. He was a cook by trade, but did other general labor.

*Mary Lawson Washington*

Cross-examination by Respondent:

This is the first time I have been married. I am twenty-eight years old. When my husband left me, I knew he was going, but did not know that he was not coming back. He left to get work.

He worked at the State Normal School at Montgomery as a cook for about a year. Since then I do not know whether he has had work to do or not. He does not own any land that I know of. He did have five or six head of cattle, and left them with his father. I do not know what became of these cattle. I do not know whether he had a job at this time or not.

*Mary Lawson Washington*

James Quinney, a witness for the complainant, testified as follows:

I am personally acquainted with both Hollis Washington and Mary Lawson Washington. I remember when they were married, which was in 1925, and know that they lived together as man and wife until in 1926. Hollis Washington, so far as I know, has not been back to visit Mary since he went away. I know that Mary has had the custody and care of the child Edwina since her birth and know that she is a fit and proper person to have the custody, care and control of the said child. So far as I know and have been able to learn, Mary gave Hollis no reason whatever for going away and leaving her.

Hollis Washington was an able-bodied man about six feet tall and he is now about twenty-eight years of age, He was a cook by trade, and worked a while at the Eastern Shore Industrial School and also did other general labor.

*James Quinney*

Leslie Yelling, a witness for the complainant, being  
duly sworn, testified as follows:

My name is Leslie Yelling. I am a resident of Daphne,  
Baldwin County, Alabama. I am personally acquainted with Mary  
Washington and Hollis Washington, and knew them when they lived  
together as man and wife, and often visited in their home. I al-  
ways found that they got along just as well as they could, and  
never knew of them fussing. They were married sometime in  
1925, and lived together until Hollis went away. This was some-  
time in 1926, and so far as I know or have ever heard, Hollis had  
no reason whatever for going away. He hasn't been back since the  
last time he went away. They have one child, a girl, Edwina, now  
two years old. Mary has had the care and control of the child  
all during its life, and is the proper person to have the care,  
custody and control of her. Hollis is not a fit and proper person  
to have the care, custody and control of the child.

Hollis Washington is an able-bodied man about six feet  
tall and twenty-eight years of age. He is a cook by trade, but  
also did other general work while here.

*Leslie Yelling*

ORAL EXAMINATION.

I, T. W. McLean, 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 witness xx and read over to them and they signed the same in the presense of myself Complainants atty also Respondents Atty, at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness xx 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 25th day of June 192 9

T. W. McLean (L. S.)

NO. \_\_\_\_\_ PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Mary Dawson Washington

vs. Complainant

Stella Washington

Respondent.

Oral Deposition

Filed June 25, 192 9

T. W. McLean, Register.

Recorded in

Record

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

Register

188 5  
154 0  
154 9  
154 6

MARY LAWSON WASHINGTON,  
Complainant,

vs

HOLLIS WASHINGTON,  
Defendant.

( IN THE CIRCUIT COURT OF  
(  
( BALDWIN COUNTY, ALABAMA.  
(  
( IN EQUITY.  
(  
( No. 841.

This cause coming on to be heard at this Term, was submitted upon the bill of complaint, answer of the Defendant, agreement as to reference and attorneys fee by and between the parties to this cause, 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 the Complainant is forever divorced from the Defendant on the grounds of voluntarily abandonment.

IT IS FURTHER ORDERED that the said Mary Lawson Washington be and she is hereby permitted to again contract marriage upon the payment of the cost of court in this cause.

IT IS FURTHER ORDERED that the said Hollis Washington pay the cost 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 Mary Lawson Washington.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Mary Lawson Washington shall not again marry except to said Hollis Washington until after sixty days from this date and that if an appeal is taken within sixty days she shall not marry again except to said Hollis Washington during the said pendency of appeal.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Hollis Washington pay to the said Mary Lawson Washington the sum of Ten Dollars per month as permanent alimony.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Hollis Washington pay to the said Mary Lawson Washington the sum of Seventy-Five Dollars as attorneys fee in this cause.

This the 4<sup>th</sup> day of February, 1930.

F. W. Ware  
Judge of the Circuit Court of  
Baldwin County, Alabama.

MARY LAWSON WASHINGTON,  
Complainant,

vs

HOLLIS WASHINGTON,  
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

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

WHEREAS by an agreement made and entered into by the  
respective parties by and through their respective attorneys of  
record in the above styled cause on the 24th day of June, 1929,  
a reference was agreed upon directing that the Register, ascertain  
as follows:

FIRST: The amount that the Defendant, Hollis Washing-  
ton should pay to the Complainant in this cause as alimony pendente  
lite.

SECOND: Amount that the Defendant, Hollis Washington,  
should pay to the Complainant, Mary Lawson Washington as permanent  
alimony.

NOW THEREFORE, I beg leave to report that I have held  
said reference in strict pursuance to said agreement, and that I  
have ascertained as follows:

FIRST: That the Defendant, Hollis Washington, should  
pay to the Complainant, Mary Lawson Washington, the sum of Ten  
Dollars per month as permanent alimony.

All of which is respectfully submitted, this 27 day  
of January, 1930.

F. W. Hare

**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 Hollis Washington

of Montgomery 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 Mary Lawson Washington

against said Hollis Washington

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 29th day of

April, 1929

T. W. Richerson Register

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





MARY LAWSON WASHINGTON,  
Complainant,

vs

HOLLIS WASHINGTON,  
Defendant.

( IN THE CIRCUIT COURT OF

( BALDWIN COUNTY, ALABAMA.

( IN EQUITY.

It is hereby expressly agreed by and between the Complainant, Mary Lawson Washington, and the Defendant, Hollis Washington, acting by and through their respective attorneys, Beebe & Hall, Solicitors of record for Complainant, and Hill, Hill, Whiting & Rives, and Norborne Stone, Solicitors of record for the Defendant, that the order of reference to determine the alimony pendente lite, permanent alimony and attorneys fees which the Complainant may be entitled to in the above cause and the notice of such reference are hereby expressly waived and the Register of this Court is hereby ordered and directed to forthwith hold a reference to ascertain and determine the following:

FIRST: The amount that the Defendant, Hollis Washington should pay to the Complainant in this cause as alimony pendente lite.

SECOND: The amount that the Defendant, Hollis Washington, should pay to the Complainant, Mary Lawson Washington as permanent alimony.

It is further expressly agreed between the parties hereto acting by and through their respective attorneys that a fee of Seventy-Five Dollars is a reasonable attorneys fee to be paid by the Defendant, Hollis Washington, to the Complainant, Mary Lawson Washington, as attorneys fee in this cause.

It is further agreed that the Register may take into consideration and consider the original testimony taken in this

cause in determining the alimony pendente lite and permanent that the Complainant is entitled to in this cause.

Dated this the 24th., day of June, 1929.

Beebe & Hae  
SOLICITORS FOR COMPLAINANT.

Hue, Hue, White & Rine

Johnson & Hae  
SOLICITORS FOR DEFENDANT.

MARY LAWSON WASHINGTON,  
Complainant,

vs

HOLLIS WASHINGTON,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

No. 841.

This cause coming on to be heard at this Term, was submitted upon the bill of complaint, answer of the Defendant, agreement as to reference and attorneys fee by and between the parties to this cause, 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 the Complainant is forever divorced from the Defendant on the grounds of voluntarily abandonment.

IT IS FURTHER ORDERED that the said Mary Lawson Washington be and she is hereby permitted to again contract marriage upon the payment of the cost of court in this cause.

IT IS FURTHER ORDERED that the said Hollis Washington pay the cost 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 Mary Lawson Washington.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Mary Lawson Washington shall not again marry except to said Hollis Washington until after sixty days from this date and that if an appeal is taken within sixty days she shall not marry again except to said Hollis Washington during the said pendency of appeal.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Hollis Washington pay to the said Mary Lawson Washington the sum of Ten Dollars per month as permanent alimony.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Hollis Washington pay to the said Mary Lawson Washington the sum of Seventy-Five Dollars as attorneys fee in this cause.

This the \_\_\_\_\_ day of \_\_\_\_\_, 1930.

Judge of the Circuit Court of  
Baldwin County, Alabama.

STATE OF ALABAMA )  
BALDWIN COUNTY )

CIRCUIT COURT,  
IN EQUITY.

I, T. W. Richerson, Register of said Circuit Court of said County of Baldwin, State of 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 \_\_\_\_\_, 1930, in the cause of Mary Lawson Washington, Complainant, vs Hollis Washington, Defendant, as appears of record in said Court.

WITNESS my hand and the seal of said Court this the \_\_\_\_\_ day of \_\_\_\_\_, 1930.

Register.

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

Comes your complainant Mary Lawson Washington, and humbly  
complaining against Hollis Washington, represents and shows unto  
your Honor as follows:

FIRST:

That both your Complainant and the Defendant, Hollis Wash-  
ton, are bona fide residents of Baldwin County, Alabama, over the  
age of twenty-one years; that both have been such residents of  
Baldwin County, Alabama, for more than three years next preceding  
the filing of the bill of complaint in this cause.

SECOND:

That your Complainant and the Defendant are wife and  
husband, having intermarried at Bay Minette, Baldwin County, Alabama,  
on June 15, 1925; that they lived together as such husband and wife  
until, to-wit, in September, 1926.

THIRD:

That in, to-wit, September, 1926, the Defendant, Hollis  
Washington, voluntarily and for no reason on the part of the Complainant  
left your complainant and has remained away voluntarily and contin-  
uously since that time; that your Complainant and the Defendant were  
living at Daphne, in Baldwin County, Alabama, when the Defendant went  
away.

FOURTH:

That there was born to said marriage between your Complainant  
and the Defendant one child, Edwina Washington, now two years old;  
that the Defendant is not a fit and proper person to have the custody  
and control of said child, but on the contrary your Complainant is  
the proper person to have the care, custody and control of said  
child;

FIFTH:

That your Complainant has no funds with which to prosecute



this cause; that she has no means of livelihood for herself and child except by her manual labor; that the Defendant is an able-bodied man capable of earning seventy-five to one hundred dollars a month.

Wherefore the premises considered your Complainant prays that your Honor will by proper process make the said Hollis Washington party Defendant to this cause, 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; that your Honor will enter a proper order and decree ordering a reference in this cause to determine what the Defendant, Hollis Washington, should pay to the Complainant as attorneys fees in this cause, and also as alimony pending the suit; that upon a final hearing of this cause your Honor will give and grant unto the Complainant a decree of absolute divorce, forever barring the bonds of matrimony existing between her and the said Hollis Washington; that your Honor will further enter an order and decree awarding the custody and control of said child, Edwin Washington, unto your Complainant, Mary Lawson Washington; that your Honor will further enter an order and decree awarding to the Complainant such reasonable amount as may be determined as permanent alimony to be paid by the Defendant, Hollis Washington, to your Complainant, Mary Lawson Washington; and as in duty bound your Complainant will ever pray.

---

Solicitors for Complainant.

FOOT NOTE:

The Defendant is required to answer each and every paragraph of the foregoing bill of complaint numbered first to fifth, inclusive, but not under oath. Oath being hereby expressly waived.

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Solicitors for Complainant.

RECORDED

Filed May 4/43  
G.M. Williams  
Beginner



1/2  
Original

SERVE ON

Circuit Court of Baldwin County  
In Equity.

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

SUMMONS

Mary Lawson Washington

**RECORDED**

vs.

Hollis Washington

(Working with Natchman and

Mertief, Montgomery, Ala.

Boards at 353 S. Jackson, St.  
Montgomery, Ala.)

Solicitor for Complainant

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY

RECEIVED IN OFFICE

Received in office this \_\_\_\_\_  
day of MAY 2 1929

JOHN L. SCOGIN, Sheriff

Sheriff.

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

May 1929  
by leaving a copy of the within Summons with  
Hollis Washington

Defendant,

Joe L. League

Sheriff.

By

W. B. Chisholm

Deputy Sheriff

**RECORDED**

MARY LAWSON WASHINGTON  
Complainant  
VS.  
HOLLIS WASHINGTON  
Respondent

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

On reference before T. W. Richerson<sup>Register</sup> in the matter of allowance of temporary alimony and attorney's fee.

Interrogatories addressed to Hollis Washington, the defendant, who resides in Montgomery, Alabama.

INTERROGATORY ONE: State if you are the defendant in this cause, and if you are the husband of Mary Lawson Washington who lives in Baldwin County, Alabama. State when you married said Mary Lawson Washington, how long you lived with her, and if you left her state when and under what circumstances. State if you have any children. State if you have since leaving your wife contributed to the support of herself or child, and if so when and to what extent. What is the financial condition of your said wife, Mary Lawson Washington, and state in what way she lives and supports her child. State how old you are, if you are in good health, and if you have any trade, and if so what it is. State in what business you are now engaged, and what wages or salary you earn. State if you are a cook by trade, and what salary you can earn in that occupation.

INTERROGATORY TWO: State under what circumstances you left your wife, and when. State if you worked at the State Normal School as a cook, and if so when, and for how long, and what your compensation therefor was. State fully your earning capacity, and what it cost you to live. State what allowance out of your earnings it is possible for you to make to assist in the support of your wife and child.

Hris Hill Whiting Thomas Rivers  
 Norborn Hill  
 Sale for Diff

Respondent suggests Mrs. E. F. Tavel, Jr., of Montgomery, Alabama, as a suitable person to take the testimony of the above witness.

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Nelson House

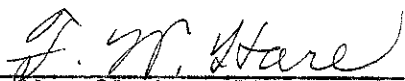
MARY LAWSON WASHINGTON, )  
 COMPLAINANT, )  
 VS )  
 HOLLIS WASHINGTON, )  
 DEFENDANT )

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

Now comes the Hon. T. W. Richerson, Clerk of  
 the Circuit Court of Baldwin County and Register in Chancery,  
 and filed his report of a reference heretofore held in the  
 above cause in pursuance of an agreement between the parties  
 to this cause, acting by and through their respective attor-  
 neys of record, dated the 24th day of June, 1929, finding  
 that the Complainant Mary Lawson Washington is entitled to  
 and should receive the sum of Ten Dollars per month as per-  
 manent alimony, and after considering such report and the  
 evidence taken in connection therewith, the Court is of the  
 opinion that such report is just and correct and should be  
 approved and confirmed.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED, that  
 such report is approved and confirmed.

Dated this the 4<sup>th</sup> day of Feb, 1930.

  
 Judge of the 21st Judicial Circuit  
 of Alabama.

MARY LAWSON WASHINGTON, Complainant,

-vs-

HOLLIS WASHINGTON, Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY. No. 841.

This cause coming on to be heard at this Term, was submitted upon the bill of complaint, answer of the Defendant, agreement as to reference and attorneys fee by and between the parties to this cause, 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 the Complainant is forever divorced from the Defendant on the grounds of voluntarily abandonment.

IT IS FURTHER ORDERED that the said Mary Lawson Washington be and she is hereby permitted to again contract marriage upon the payment of the cost of court in this cause.

IT IS FURTHER ORDERED that the said Hollis Washington pay the cost 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 Mary Lawson Washington.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Mary Lawson Washington shall not again marry except to said Hollis Washington until after sixty days from this date and that if an appeal is taken within sixty days she shall not marry again except to said Hollis Washington during the said pendency of appeal.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Hollis Washington pay to the said Mary Lawson Washington the sum of Ten Dollars per month as permanent alimony.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Hollis Washington pay to the said Mary Lawson Washington the sum of Seventy-Five Dollars as attorneys fee in this cause.

This the 4th day of February, 1930.

F. W. Hare  
Judge of the Circuit Court of  
Baldwin County, Alabama.

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

I, T. W. Richerson, 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 4th day of February, 1930, in the cause of MARY LAWSON WASHINGTON, Complainant, vs. HOLLIS WASHINGTON, Defendant, as appears of record in said Court.

Witness my hand and the seal of said Court, this the 15th day of February, 1930.

Register

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

Comes your complainant Mary Lawson Washington, and humbly  
complaining against Holis Washington, represents and shows unto  
your Honor as follows:

FIRST:

That both your Complainant and the Defendant, Holis Wash-  
ton, are bona fide residents of Baldwin County, Alabama, over the  
age of twenty-one years; that both have been such residents of  
Baldwin County, Alabama, for more than three years next preceding  
the filing of the bill of complaint in this cause.

SECOND:

That your Complainant and the Defendant are wife and  
husband, having intermarried at Bay Minette, Baldwin County, Alabama,  
on June 15, 1925; that they lived together as such husband and wife  
until, to-wit, in September, 1926.

THIRD:

That in, to-wit, September, 1926, the Defendant, Holis  
Washington, voluntarily and for no reason on the part of the Complainant  
left your complainant and has remained away voluntarily and contin-  
uously since that time; that your Complainant and the Defendant were  
living at Daphne, in Baldwin County, Alabama, when the Defendant went  
away.

FOURTH:

That there was born to said marriage between your Complainant  
and the Defendant one child, Edwina Washington, now two years old;  
that the Defendant is not a fit and proper person to have the custody  
and control of said child, but on the contrary your Complainant is  
the proper person to have the care, custody and control of said  
child;

FIFTH:

That your Complainant has no funds with which to prosecute

this cause; that she has no means of livelihood for herself and child except by her menial labor; that the Defendant is an able-bodied man capable of earning seventy-five to one hundred dollars a month.

Wherefore the premises considered your Complainant prays that your Honor will by proper process make the said Holis Washington party Defendant to this cause, 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; that your Honor will enter a proper order and decree ordering a reference in this cause to determine what the Defendant, Holis Washington, should pay to the Complainant as attorneys fees in this cause, and also as alimony pending the suit; that upon a final hearing of this cause your Honor will given and grant unto the Complainant a decree of absolute divorce, forever barring the bonds of matrimony existing between her and the said Holis Washington; that your Honor will further enter an order and decree awarding the custody and control of said child, Edwina Washington, unto your Complainant, Mary Lawson Washington; that your Honor will further enter an order and decree awarding to the Complainant such reasonable amount as may be determined as permanent alimony to be paid by the Defendant, Holis Washington, to your Complainant, Mary Lawson Washington; and as in duty bound your Complainant will ever pray.

Beebe & Hall  
Solicitors for Complainant.

FOOT NOTE:

The Defendant is required to answer each and every paragraph of the foregoing bill of complaint numbered first to fifth, inclusive, but not under oath. Oath being hereby expressly waived.

Beebe & Hall  
Solicitors for Complainant.

Interrogatories

Filed Aug 26/1929

T. M. Bickman  
Register

8/16/29

We hereby accept  
service of a copy of  
the within interrogatories  
Beck & Hall  
Attys for Camp