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STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon CHARLEY SNOWDEN to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery jurisdiction within thirty days after the service of summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by HELEN SNOWDEN against CHARLEY SNOWDEN, and further to do and perform what said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court, immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Circuit Court, this the _____ day of 11th, 1942.

R. S. Duck
Register.

HELEN SNOWDEN, COMPLAINANT,	IN THE CIRCUIT COURT OF
VS.	BALDWIN COUNTY, ALABAMA,
CHARLEY SNOWDEN, RESPONDENT.	IN EQUITY:

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

Now comes your Complainant, HELEN SNOWDEN, and humbly complaining against the Respondent, CHARLEY SNOWDEN, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

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

2.

That the Complainant and the Respondent were married at Pensacola, Florida, on December 9, 1939, and lived together as husband and wife, in Baldwin County, Alabama, until in July, 1941;

3.

That on to-wit: in July, 1941, the Respondent threatened, cursed and abused the Complainant and threatened to do violence to her person; that the conduct of the Respondent was such as to cause the Respondent every reasonable apprehension to believe and she did actually believe that if she continued to live with him he would do violence to her person, which would necessarily endanger her life and health.

PRAYER FOR PROCESS

Wherefore, the premises considered, your Complainant prays that your Honor will by proper process, make the said CHARLEY SNOWDEN party respondent to this Bill of Complaint, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

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

BEEBE & HALL

By: *Shirley*
Solicitors for Complainant

The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

HELEN SNOWDEN

Complainant

VS

CHARLEY SNOWDEN

Respondent

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

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony here-
 tofore existing between the Complainant and Defendant be, and the same are hereby, dissolved,
 and that the said Helen Snowden

is forever divorced from the said Charley Snowden

for and on account of

Cruelty

It is further ordered, adjudged and decreed that neither party to this suit shall again marry
 except to each other until sixty days after the rendition of this decree, and that if appeal is taken
 within sixty days, neither party shall again marry except to each other during the pendency of said
 appeal.

It is further ordered that the Complainant and the Respondent

be, and ~~they are~~ hereby permitted to again contract marriage upon the payment of the cost of
 this suit.

It is further ordered that Charley Snowden

the Respondent pay the cost herein to be taxed, for which execution may issue.

This 14th day of August

1942

J. M. Stare
 Judge Circuit Court, in Equity.

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

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

 Register of Circuit Court, in Equity.

RECORDED

No 851 Page

The State Of Alabama
Baldwin County

In Circuit Court, In Equity

.....
HELEN SNOWDEN
vs. Complainant.

.....
CHARLEY SNOWDEN
Respondent.

DIVORCE DECREE

HELEN SNOWDEN, COMPLAINANT,

VS.

CHARLEY SNOWDEN, RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

And now comes the Respondent and for answer to the Complainant's Bill of Complaint, and each paragraph thereof, says:

1. He admits the allegations contained in paragraphs 1 and 2.
2. He denies the allegations contained in paragraph 3 and demands strict proof of the same.

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

Charley Snowden
Respondent.

WITNESS:

H. H. H. H.

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HELEN SNOWDEN, COMPLAINANT,

VS.

CHARLEY SNOWDEN, RESPONDENT.

ANSWER AND WAIVER

Filed May 11 1942
J. L. L. L.
By

851

HELEN SNOWDEN, COMPLAINANT,

VS.

CHARLEY SNOWDEN, RESPONDENT.

SUMMONS AND COMPLAINT

Filed Aug 11/41
R. S. [unclear]
[unclear]

RECORDED

No. 851

The State of Alabama,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

HELEN SNOWDEN, COMPLAINANT,

VS.

CHARLEY SNOWDEN, RESPONDENT

NOTE OF TESTIMONY

Filed in Open Court this 11th

day of July 1942

Robert
Register.

HELEN SNOWDEN

VS.

CHARLEY SNOWDEN

THE STATE OF ALABAMA,
BALDWIN COUNTYIN EQUITY
CIRCUIT COURT OF BALDWIN COUNTY

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, _____

Answer and Waiver of the Respondent, and testimony of Helen Snowden _____

and Lucile Jackson, _____

and in behalf of Defendant upon _____



Register.

REQUEST FOR DECREE IN VACATION

Printed by The Baldwin Times

State of Alabama,
Baldwin County.

} NO. _____ TERM, 194____.

HELEN SNOWDEN

Complainant—.

VS.

CHARLEY SNOWDEN

Respondent—.

TO R. S. DUCK, REGISTER:

In the above stated cause an Answer & Waiver
having been _____ filed _____ the Respondent—,
and evidence having been taken, and the cause being ready for submission for final decree, and
no defense having been interposed, the complainant—, by Beebe & Hall,
Solicitor—s of record, now files with the Register of this Court this written request to deliver the
papers in this cause to the Judge for final decree in vacation.

Beebe & Hall

Solicitor—s for Complainant—.

NO. 851HELEN SNOWDEN

Complainant—

VS.

CHARLEY SNOWDEN

Respondent—

Request For Decree In Vacation

Filed

Aug 111942R. J. Mac-

Register.

ORAL EXAMINATION

I, Frances Brantly ^{Special} 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 and read over to them and they signed the same in the presence of myself and Shirley

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness 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 11 day of August 19 42.
Frances Brantly (L. S.)

No. 851 Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

HELEN SNOWDEN
COMPLAINANT

VS.

CHARLEY SNOWDEN
RESPONDENT

ORAL DEPOSITION

Filed Aug 11, 1942
R. S. Brantly, Register.

RECORDED IN _____

Record _____

Vol. _____ Page _____

_____, Register

The State of Alabama }
Baldwin County

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

HELEN SNOWDEN

COMPLAINANT

VS.

CHARLEY SNOWDEN

RESPONDENT

I, Frances Brantley

as ~~Register and~~ Commissioner

have called and caused to come before me

Helen Snowden and Lucile Jackson

witnesses named in the requirement for Oral Examination, on the 9th day of August

1942, at the office of Beebe & Hall

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

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

Helen Snowden

doth depose and say as follows:

My name is Helen Snowden. I live at Daphne, in Baldwin County, Alabama. I am over twenty-one years of age. The Respondent, Charley Snowden, is over twenty-one years of age and a resident of Baldwin County, Alabama, living at Bay Minette.

Charley Snowden and I were married at Pensacola, Florida, on December 9, 1939. We immediately returned to Baldwin County, Alabama, where we lived until in July, 1941, when I was forced, on account of the conduct of the Respondent to cease living with him.

The Respondent, while we were living together as husband and wife, often threatened and abused me and on several occasions threatened to do violence to my person. While he did not actually strike me his conduct was such as to give me every reasonable apprehension to believe and I did actually believe that my life was in danger if I continued to live with him. I made every effort to live with him, but with no avail, until finally I was forced to leave him. I know that we cannot live together any more.

Helen Snowden

LUCILE JACKSON, A WITNESS FOR THE COMPLAINANT, BEING FIRST DULY SWORN, DEPOSES AND SAYS:

My name is Lucile Jackson. I live at Daphne, in Baldwin County, Alabama. I am personally acquainted with the Complainant, Helen Snowden, and the Respondent, Charley Snowden, in the above styled cause. I remember when they were married in December, 1939. I lived near then during the time they were living together as husband and wife, in Baldwin County, Alabama. I know that the Respondent is a man of high temper and that he often threatened and abused the Complainant. His conduct toward the Complainant was such as to render it absolutely impossible for her to live with him. I know that he often abused her and threatened to do violence to her person, which would have necessarily endangered her life and health.

Lucile Jackson