

Circuit Court, Baldwin County, Ala.
In Equity.

No. 940

Anna Dember

vs.

M. Lawrence Dember

Cost Bill

Paid _____ 193 _____

Register.

Moore Printing Co. Bay Minette

No

940

vs.

PLAINTIFF

DEFENDANT

Bill of Costs

Received payment this _____ day of _____ 193_____

Register.

Dismissed for want of prosecution. Cost Bill to Plf. atty.
2/14/34.

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 Lawrence Winberg

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

Anna Winberg,

against said Lawrence Winberg

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 28th day of Oct 1930.

T. W. Richerson

Register

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

ANNA WINBERG,

Complainant,

vs.

LAWRENCE WINBERG,

Respondent.

IN THE CIRCUIT COURT-EQUITY SIDE.

STATE OF ALABAMA.

BALDWIN COUNTY.

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

Comes your Complainant, Anna Winberg, and exhibits this
her Bill of Complaint for Divorce a mensa et thoro against Lawrence
Winberg, and shows:

FIRST:

That both your Complainant and Respondent are over the
age of twenty-one years and are bona fide residents of Baldwin
County, Alabama, residing at Fairhope, having been such residents
for the last past eighteen years.

SECOND:

That your Complainant and the Respondent were married on
heretofore, to-wit, September 6, 1897, and have lived together as
man and wife, except for intervals when complainant and respondent
were temporarily separated, until a few days ago, when on account
of the matters hereinafter complained of your complainant was com-
pelled to leave the respondent and live separate and apart from
him.

THIRD:

That the Respondent has been guilty of cruel and inhuman
conduct toward your Complainant, having on numerous occasions and
at the time of the last separation hereinabove referred to, threat-
ened to do your Complainant bodily harm; that the Respondent is a
man of strong and ungovernable temper and when his temper is aroused
he goes into a rage and assumes his threatening attitude toward
your Complainant; that his conduct has been such and was at the
time of the last separation such that your Complainant apprehended

the commission of actual violence on her person attended with danger to life and health, should she continue to live with him as his wife; and on account of such conduct and her fears, she has removed herself and her belongings into another part of the dwelling where your Complainant and the Respondent have been residing with their two children hereinafter named.

FOURTH:

That of the children born to your Complainant and the Respondent by said marriage there now remain with them two girls, namely, Anna Laura and Leoma, who are sixteen and ten years of age respectively; that the Respondent is not but your Complainant is a fit and proper person to have the care, custody and control of said children.

PRAYER FOR PROCESS AND RELIEF.

THE PREMISES CONSIDERED, your Complainant prays that the above named Respondent, Lawrence Winberg, be made party defendant to this cause by the usual processes of this Honorable court, requiring him to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the statutes in such cases made and provided.

That a reference be ordered held by and before the Register of this Court to ascertain a reasonable amount to be paid to your Complainant as solicitor's fees for the prosecution of this suit and as alimony pendente lite, and that there be decreed in favor of your Complainant a reasonable amount to be paid to her by the Respondent as solicitor's fees for the prosecution of this suit and as alimony pendente lite.

That upon a final hearing of this cause there be granted unto your complainant a Divorce a mensa et thoro and that there be decreed in her favor a reasonable amount to be paid to her by the Respondent as permanent alimony, and that the care, custody and control of the two children above named be awarded to your complainant; and should your complainant be mistaken in the relief here prayed for, that there be granted such other, further

and different relief to which she may be entitled. And as in duty bound, she will ever pray.

Anna Winberg
Complainant.

NORBORNE STONE,

Solicitor for complainant.

FOOT NOTE:

The Respondent is required to answer each and every paragraph of the foregoing Bill of Complaint from "FIRST" to "FOURTH", both inclusive, but answer under oath is hereby expressly waived.

NORBORNE STONE,

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 Lawrence Winberg

(Fairhope 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 Anna Winberg,

against said

Lawrence Winberg

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 15th day of

Nov 1930

T. W. Richerson

Register

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

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 Lawrence Winberg

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

Anna Winberg,

against said Lawrence Winberg

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 28th day of

Oct 1930.

T. W. Richerson Register

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

SERVE ON _____
Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

Anna Winberg

vs.

Lawrence Winberg

Norborne Stone

Solicitor for Complainant

Recorded in Vol _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this 13th
day of November 1930
C. Dravin
Sheriff.

Executed this 11/22 day of
Nov 1931
by leaving a copy of the within Summons with

Lawrence Winberg
C. Dravin
Defendant.
Sheriff.

By W. H. Steele
Deputy Sheriff.

SERVE ON _____

Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

Anna Winberg

vs.

Lawrence Winberg

G. A. Stone

Alias issued

Norborne Stone.

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY,

Received in office this _____

day of _____ 19____

Sheriff.

Executed this _____ day of _____

19____

by leaving a copy of the within Summons with _____

Defendant.

Sheriff.

By _____

Deputy Sheriff.

ANNA WINBERG,
Complainant,

vs

LAWRENCE WINBERG,
Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY, #940.

Comes the Respondent, Lawrence Winberg, in the above styled cause and answering Complainant's bill of complaint says:

FIRST:

He admits the allegation of paragraph first.

SECOND:

He admits that the Complainant and this Respondent were married September 6, 1898, and have lived together as man and wife continuously since. Respondent denies that Respondent and Complainant are not living together now as man and wife.

THIRD:

Respondent denies that he has been guilty of cruel and inhuman conduct towards the Complainant, that he has threatened to do the Complainant bodily harm, that he is of strong and ungovernable temper, and that he goes into a rage and assumes a threatening attitude towards the Complainant, that his conduct has ever been such that Complainant could reasonably apprehend the commission of actual violence on her person, attended with danger to her life and health, and denies that he has ever given Complainant, on account of his conduct, any cause to fear any bodily harm or actual violence on her person, but says that the contrary is true.

FOURTH:

Respondent admits that he and the Complainant have two minor children, namely, Anna Laura and Leoma, whose ages are sixteen and ten years respectively, and he denies that he is not the proper person to have the care, custody and control of said children.

Having fully answered Respondent prays that he may go
hence with his reasonable cost.

Beebe & Hall
ATTORNEYS FOR RESPONDENT.