WITNESS' FEES, \$_

The State of Alabama, Baldwin County

CIRCUIT COURT

To IDA M. TURNBULL,	
KNOW YE: That we, having full faith in your prudence and compe	tency, have appointed you Com-
missioner, and by these presents do authorize you, at such time and place as y	-
and examine	
Annie Olson; and Jonnye Harmon	
j.	
as witnesses in behalf ofComplainant,	in a cause pending in our Circuit
Court of Baldwin County, of said State, wherein	
ANNIE OLSON	
ANNIE OLDON	
	Complainant
andCHARLES A. OLSON,	
	Defendant,
on eath to be by you administered, uponthem	
to take and certify the deposition. S of the witness. es and return the same	to our Court, with all convenient
speed, under your hand.	
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Witness24th day of1919	<u>3</u> 8
	R.S. Duck
COMMISSIONER'S FEE, \$10.00	REGISTER
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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

A.N.	VIII CLEOCI	LV 2		Complainant	
		vs.			
C H.	ARIES A.	OLSON,		Respondent	
This cause coming on to be I		1.7			o Confesso
on Answer of Responder	at	and Test	timony as noted	by the Register	, and upon
consideration thereof, the Court is of in said bill.	the opinion	that the Comp	olainant is entitl	ed to the relief	prayed for
It is therefore ordered, adjud- fore existing between the Complainar	ged and dec nt and Defen	reed by the Cadant be, and	Court that the b the same are h	onds of matrime ereby, dissolved	ony nereto- l, and that
the said Annie Ols	on				.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
is forever divorced from the said	Á				
Charles A	. Olson				
for and on account ofCP	uelty.				······································
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to each other until sixty days after t days, neither party shall again marry It is further ordered that	except to e	ach other duri Annie Ols	ng the pendency	of said appeal.	
be, and <u>she is</u> hereby pern this suit. It is further of authorized to resume her It is further ordered that	nitted to aga rdered ag r former Charle	nd decree name, "A os A. Olso	narriage upon the distribution that the name Dawson,	he payment of complaina	the cost of nt is
the respondent, pay	the cost her	ein to be taxed	d, for which exec	cution may issue	e .
This 25 day of	-Je	anur	-	₁₉ 38.	-
			AM.	Hase	
	<u></u>		Judge Cir	cuit Court, in E	Quity.

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			ty, Alabama, d by of the origin		
			irt in the above		
	decree is or	n file and enre	olled in my offi	ce.	
	Witn	ess my hand a	and seal this the		day
	of		***************************************	,	19
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and the second s			Register of	Circuit Court, i	n Equity.

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

Comes ANNIE OLSON and, humbly complaining against CHARLES A. OLSON, respectfully shows unto your Honor as follows:

FIRST:

That your complainant and the said Charles A. Olsen are both over the age of twenty-one years and residents of Baldwin County, Alabama, where they have resided for more than six years next preceding the filing of this bill of complaint.

SECOND:

That your complainant and the said Charles A. Olson are husband and wife, having intermarried more than eight years ago; that they lived together as husband and wife in Baldwin County, Alabama, continuously for more than six years next preceding November 4th, 1937; that on said date your complainant and the said Charles A. Olson separated and have not lived together as husband and wife since said date.

THIRD:

That on, to-wit, November 4th, 1937, said Charles A. Olsen cursed, abused, struck and choked your complainant without just cause or provocation, badly bruising her and threatening to kill her; that the said Charles A. Olson is a strong, able-bodied man and your complainant feared that if she continued to live with him, he would carry out his threats and kill her or do her bodily harm, with serious impairment of her health.

FOURTH:

That the said Charles A. Olsen is a man of considerable means and your complainant owns no property, has no means of support and is not able to engage in any remunerative employment if she could obtain the same.

WHEREFORE, your complainant prays this Honorable Court will take jurisdiction of the cause made by this bill of complaint, and by

appropriate process of law require the defendant to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

complainant further prays this Honorable Court will make and enter a decree forever dissolving the bonds of matrimony existing between the said complainant and the said Charles A. Olson, and will make and enter a decree allowing to your complainant such reasonable amount as this Honorable Court shall deem meet and proper for her maintenance and support and for attorney's fees, and will make and enter a decree directing the said Charles A. Olson to pay the same at such time and in such manner as this Honorable Court shall decree.

Complainant further prays for such other, further or different relief as in equity and good conscience she shall be entitled to in the premises.

Beele Hall Beele Attorneys for Complainant.

FOOT NOTE:

Respondent is required to answer each and every allegation of the foregoing bill of complaint, paragraphs FIRST to FOURTH inclusive, but not under oath, oath is hereby expressly waived.

Bule Hall Bulke
Attorneys for Complainant.

Complainant,

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA
IN CHANCERY

ANSWER

VS.

CHARLES A. OLSON,

Respondent.

Comes now the above named Respondent and for answer to the Bill of Complaint says:-

That he admits the allegations of the first paragraph of the Bill of Complaint.

For further answer this Respondent denies each and every allegation of the Bill of Complaint.

Wherefore, having fully answered, Respondent prays that he may go hence without day and have judgment for his costs herein expended.

Solicitor for Respondent

Complainant,

vs.

CHARLES A. OLSON,

Respondent.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA
IN CHANCERY

STIPULATION

Comes now the above named Respondent by his Solicitor of record and stipulates and agrees that the testimony in behalf of the Complainant may be taken at any time without notice to the Respondent and that this cause may be submitted to the court at any time.

Solicitor for Respondent.

Complainant,

VS.

CHARLES A. OLSON,

Respondent.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN CHANCERY

STIPULATION

Comes now the above named Respondent by his Solicitor of record and stipulates and agrees that the testimony in behalf of the Complainant may be taken at any time without notice to the Respondent and that this cause may be submitted to the court at any time.

Solicitor for Respondent

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In Circuit Court, In Equity The State of Alabama

Baldwin County

Charles A. Olson Annie Olson vs. Complainant. Respondent.

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	:	vs.		-
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		Respon	dent.	
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·	Baldwin County.	
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ANN	IE OLSON,	
	Vs.	
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COMMISSION TO TAKE DEPOSITION COMMISSIONER: IDA M. TURNBULL,	ANNIE OISON. Complainant, vs. CHARIES A. OLSON, Respondent.	The State of Alabama BALDWIN COUNTY CIRCUIT COURT
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Respondent.

STIPULATION

Attorney Foley, Alabama.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN CHANCERY

NNIH OLSON,

Complainant,

A. OLEON

Respondent.

STIPULATION

LLOYD A. WAGNEY

LLOYD A. MAGNEY Attorney Foley, Alabama.

ANSWER

The State of Alabama

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

	ANNIE OLSON	2			СОМЕ	PLAINANT	
•		vs	.				
	CHARLES A. (OLSON,			RES	PONDENT	
Ι,	IDA M. T	URNBULI					
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have called an	nd caused to come before m	ne	 				
	Annie Olsen and	Jonnye	Harmor	1		: 	
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witness es na	amed in the requirement for	r Oral Exa					
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truth, the who	ole truth, and nothing but	the truth,	the said				
•	TE OLSON				•		<i>e</i> 1

My name is Annie Olsen; I am over the age of twenty-one years and reside in Baldwin County, Alabama, where I have resided for more than eight years next preceding this date. Charles A. Olsen is over the age of twenty-one years and a resident of Baldwin County, Alabama, and has resided in said County for more than eight years next preceding this date. The said Charles A. Olson and I were married at Pensacola approximately nine years ago and shortly thereafter moved to Daphne, in Baldwin County, Alabama, where we have continuously resided as husband and wife to November That on November 4th, 1937, Charles A. Olson and I 4th, 1937. The cause of our separation was that he flew into a separated. violent rage, threatened, cursed and abused me and struck me and threatened to kill me. For several months prior to this date his temper had been growing worse and on several occasions he had cursed and abused me, and had prior to that time struck me, but his rage on November 4th was more violent than theretofore. left bruises on or about my body that stayed there for weeks. He is a strong, able-bodied, powerful man and I feared that if I continued to live with him he would wither kill me or do me bodily harm with serious impairment to my health. We have not lived together as husband and wife since November 4th, 1937, and I fear that if I do return to him he will execute his threats We have no children. My name prior to my marriage against me. with Mr. Olsen was Annie Dawson, and in the event divorce is granted I should like to resume my maiden name.

annie Olson.

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I,Ida	a M. Turnbull		<u>ns Register and</u> Com	missioner hereby certify
that the foregoing d	eposition on Ora	l Examinatio	n was taken down in wri	ting by me in the words
of the witness es an	d read over to <u>th</u>	em and	they signed the	same in the presence of
myself and	W. C. Beebe	€		
at the time and place	e herein mentioned	; that I have	e personal knowledge of	personal identity of said
witnesses, or had	proof made before	me of the i	dentity of said witness	es; that I am not of
counsel or of kin to	any of the parties t	o said cause,	or any manner intereste	d in the result thereof.
I enclose the s	aid Oral Examinat	ion in an env	elope to the Register of	said Court.
Given under n	ay hand and seal, t	his 24th	day of January	<u>19 38</u>
•			Ida M. Tur	•
			July Fr. July	(L. S.)
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The said Jonnye Harmon having been duly sworn, testified as follows:

My name is Jonnye Harmon. I have lived across the street from Mr. and Mrs. Olsen for a considerable length of time prior to November 4th, 1937. I have it frequently heard Mr. Olsen abuse Mrs. Olsen. On November 4th I/heard Mr. Olsen curse and abuse Mrs. Olsen but later on in the day I saw Mrs. Olsen and saw the bruises on her body. Mr. Olsen is a man of violent and ungovernable temper and there is serious danger that if Mrs. Olsen continues to live with him, he may do her bodily harm, with serious impairment to her health, or maybe kill her. Mrs. Olsen always seemed to be a kind woman and never gave Mr. Olsen any cause for any of his outbursts of temper. Mr. Olsen is a powerfully built man and when in a rage of temper is dangerous, and Mrs. Olsen sught not to attempt to live with him any more. The bruises I saw on her body were horrible.

Mas Jounge Harmon-