

ANNIE MAE PRICE,

Complainant,

vs.

JOHN N. PRICE,

Respondent.

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,

and Testimony of Annie Mae Price and Bernice Washington

and in behalf of Defendant upon Answer, Waiver and Acceptance of Service

R. S. DUCK

clerk, register

Register.

*[Signature]*  
Deputy

ANNIE MAE PRICE,  
Complainant,  
VS.  
JOHN N. PRICE,  
Respondent.

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

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

Comes your Complainant, ANNIE MAE PRICE, and humbly complaining against the Respondent, JOHN N. PRICE, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That your Complainant is over twenty-one years of age and a resident of Baldwin County, Alabama, and has been for more than three years next preceding the filing of this Bill of Complaint; that the Respondent is over twenty-one years of age and a resident of Baldwin County, Alabama;

2. That your Complainant and Respondent were married at Lucedale, in the State of Mississippi, on October 29th, 1937; that they lived together as husband and wife until March 28th, 1938;

3. That on to-wit, March 28th, 1938, and various times prior thereto, the Respondent cursed and abused the Complainant and threatened to do actual violence to her person, which would necessarily endanger her life and health; that his conduct is such as to cause your Complainant to have reasonable apprehension to believe and she does actually believe that if she continues to live with him as his wife that he will carry out his threats and do actual violence to her person which will necessarily endanger her life and health.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said JOHN N. PRICE 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 of this cause, your Honor will give and grant unto her a decree of divorce forever barring the bonds of matrimony existing between her and the Respondent, JOHN N. PRICE; Complainant prays for such other, further, different or general relief as she may be in equity and good

conscience entitled to receive, and as in duty bound she will ever pray.

Annie Mae Price  
Complainant,

Behestall Beebe  
Solicitors for Complainant.

FOOT NOTE:

The Respondent, JOHN N. PRICE, is required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 3, inclusive, but not under oath, oath being hereby expressly waived.

Annie Mae Price  
Complainant,

Behestall Beebe  
Solicitors for Complainant.

ANNIE MAE PRICE,  
Complainant,  
VS.  
JOHN N. PRICE,  
Respondent.

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

This cause coming on to be heard was submitted upon the original Bill of Complaint and pleadings and proof as noted by the Register, and the Court, after due consideration, is of the opinion that the Complainant is entitled to the relief prayed for.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Court that the bonds of matrimony heretofore existing between the Complainant and the Respondent be, and the same are hereby dissolved, and the Complainant is forever divorced from the Respondent on the ground of cruelty.

IT IS FURTHER ORDERED that the Complainant and Respondent be and they are hereby permitted to again contract marriage upon the payment of the costs in this cause.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Complainant pay the costs herein taxed, for which execution may issue.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said ANNIE MAE PRICE shall not again marry, except to the said JOHN N. PRICE, until sixty days after this date, and that if an appeal is taken within sixty days, she shall not again marry, except to the said JOHN N. PRICE, during the pendency of the appeal.

DATED at Monroeville, Monroe County, Alabama, this 14<sup>th</sup> day of November, 1938.

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

The State of Alabama, }  
Baldwin County

CIRCUIT COURT

To O'BYRNE JONES,

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 ANNIE MAE PRICE and BERNICE WASHINGTON

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

ANNIE MAE PRICE,

Complainant

and JOHN M. PRICE,

Defendant,

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

Witness 12th day of November 1938

R. S. DUCK  
clerk, - register

By *Handwritten Signature*  
Deputy

REGISTER

COMMISSIONER'S FEE, \$

WITNESS' FEES, \$

ANNIE MAE PRICE,

Complainant,

VS.

JOHN N. PRICE,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

And now comes the Respondent, JOHN N. PRICE, in his own proper person, and waives notice of the time of taking testimony on behalf of the Complainant; the right to cross examine the witnesses of the complainant, and expressly waives any and all notices required by law to be given him and consents that this cause be submitted for final decree forthwith without further notice.

WITNESSES:

*W. B. Jones*  
*Shirley*

*John N. Price*  
Respondent.

ANNIE MAE PRICE,

Complainant,

VS.

JOHN N. PRICE,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

And now comes the Respondent, JOHN N. PRICE, in his own proper person, and for answer to the complaint herein filed, and to each paragraph therein, separately and severally, says:

1st: That he admits the allegations contained in Paragraphs 1 and 2.

2nd: That he denies the allegation contained in Paragraph 3 and demands strict proof of the same.

WITNESSES:

*C. B. Jones*  
*Shirley*

*John N. Price*  
Respondent.





RECORDED

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

**The State of Alabama**  
BALDWIN COUNTY

**IN EQUITY**  
**Circuit Court of Baldwin County**

ANNIE MAE PRICE,

Complainant,

vs.

JOHN N. PRICE,

Respondent.

**NOTE OF TESTIMONY**

Filed in Open Court this 12th

day of November 1938

**R. S. DUCK**

clerk, "Register" REGISTER

MOORE PRINTING CO. BALDWIN COUNTY, ALA.

*Thompson*  
Deputy

*Recd*  
RECORDED 8-

BILL OF COMPLAINT

ANNIE MAE PRICE,

Complainant,

VS.

JOHN H. PRICE,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

*Filed November 12, 1935*  
*R. S. Durr, Register*  
*By: Thomas Hampton, Deputy*

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

Complainant \_\_\_\_\_  
vs. \_\_\_\_\_

Defendant \_\_\_\_\_

**COMMISSION TO TAKE DEPOSITION**

**COMMISSIONER:** \_\_\_\_\_

**WITNESSES:** \_\_\_\_\_

RECORDED

ACCEPTANCE OF SERVICE

ANNIE MAE PRICE,  
Complainant,

VS.

JOHN N. PRICE,  
Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

*Filed November 13, 1935*  
R. S. DUCK  
clerk, - register  
By *Arthur J. Hays* Deputy

RECORDED

ANSWER:

ANNIE MAE PRICE,

Complainant,

VS.

JOHN N. PRICE,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

*Filed November 12, 1935*

R. S. DUCK

clerk - register

*By Andrew Thompson*

Deputy

RECORDED

WAIVER:

ANNIE MAE PRICE,  
Complainant,

VS.

JOHN W. PRICE,  
Respondent.

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

*Filed November 12, 1935*  
R. S. DUCK  
clerk - registry  
By *Phillip Thompson*  
Deputy -

RECORDED

*Duel*  
2 - 403

FINAL DECREE OF DIVORCE

ANNIE MAE PRICE,  
Complainant,  
VS.  
JOHN N. PRICE,  
Respondent.

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

*Filed November 15, 1938*  
*R.S. Duel, Register*  
*By - Wallace Thompson, Deputy*

ORAL EXAMINATION

I, O'Byrne Jones, as Special Register and Commissioner hereby certify

that the foregoing deposition s. on Oral Examination was taken down in writing by me in the words of the witness es and read over to them and they signed the same in the presence of myself and Hubert M. Hall

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof made before me of the identity of said witness es. ; 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 12th day of November 19 38.

O'Byrne Jones (L. S.)  
Special Commissioner

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

The State of Alabama  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

ANNIE MAE PRICE,

COMPLAINANT

vs.

JOHN N. PRICE

RESPONDENT

ORAL DEPOSITION

Filed November 12th, 19 38

**R. S. DUCK**

clerk, " register

Register

By Hubert M. Hall  
Deputy Register

Record

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

Register



The State of Alabama }  
Baldwin County

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

ANNIE MAE PRICE

COMPLAINANT

VS.

JOHN W. PRICE

RESPONDENT

I, C. RYMER JONES

Special  
as Register and Commissioner

have called and caused to come before me Annie Mae Price and Bernice Washington

witnesses named in the Requirement for Oral Examination, on the 12 day of November

19 38, at the office of Beebe, Hall & Beebe,

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

truth, the whole truth, and nothing but the truth, the said Annie Mae Price and Bernice

Washington doth depose and say as follows:

My name is Annie Mae Price. I live at Daphne, in Baldwin County, Alabama. I have been a resident of Baldwin County, Alabama, all my life. I am over twenty-one years of age.

John W. Price and I were married at Lucedale, Mississippi, on October 29th, 1937. We lived together as husband and wife until March 28th, 1938. We have no children.

On March 28th, 1938, and at various times prior thereto, the Respondent cursed, abused and threatened me. I made every effort to live with him, but his conduct was such as to cause me to have every reasonable apprehension to believe that he would continue to curse and abuse me and would carry out his threats and do actual violence to my person, which would necessarily endanger my life and health. His conduct was such as to render it impossible for me to live with him as his wife. I know that it is impossible and there is no need of me trying to live with him as his wife. His conduct was such as to cause me to be in fear at all times that he might commit some violence to me.

Annie Mae Price

BERNICE WASHINGTON, A WITNESS FOR THE COMPLAINANT, BEING FIRST DULY SWORN, DEPOSES AND SAYS:

My name is Bernice Washington.

I am personally acquainted with Annie Mae Price and also with John W. Price. I knew them while they lived together as husband and wife. They lived together from sometime in October, 1937, until the latter part of March, 1938. The Respondent, Price, has an awful temper and at various times I know that he has threatened and abused Annie Mae Price. I have often been around them and know that his conduct was such as to render it impossible for her to live with him as his wife in any peace. I consider it impossible for her to live with him as his wife.

Bernice Washington