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STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon BURNS SNYDER 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 HELEN B. SNYDER against said BURNS SNYDER, and further to do and perform what said Judge shall order and direct in that behalf. And this the said 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 10<sup>th</sup> day of January, 1941.

R. S. Duck  
Register.

HELEN B. SNYDER,  
Complainant,  
VS.  
BURNS SNYDER,  
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:

And now comes your Complainant, HELEN B. SNYDER, and humbly complaining against the Respondent, BURNS SNYDER, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That your Complainant and the Respondent are both residents of Baldwin County, Alabama, and over twenty-one years of age.
2. That your Complainant and the Respondent were married at Atmore, in Escambia County, Alabama, on September 5th, 1939, and lived together as husband and wife only two days, in Baldwin County, Alabama.
3. That the Respondent is a man of high temperament; that immediately after their marriage the Respondent began cursing, abusing and threatening the Complainant and often threatened to do violence to her person; that his conduct was such as to give her every reasonable apprehension to believe and she did actually believe that if she continued to live with him as his wife, he would carry out his threats and do violence to her person, which would necessarily endanger her life and health.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said BURNS SNYDER 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 absolute divorce, forever barring the bonds of matrimony existing between her and the Respondent, BURNS SNYDER, and that a further decree be entered restoring to your Complainant her former name, Helen Brown; 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.

BERRY C. HALL,

By: 

Solicitors for Complainant.

HELEN G. SNYDER,  
Complainant,  
VS.  
BURGIS SNYDER,  
Respondent.

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

Now comes the Respondent, in his own proper person, and for answer to the Complainant's Bill of Complaint, and to each count thereof, separately and severally, says:

1. That he admits the allegations contained in Paragraphs 1 and 2.
2. That 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 consents that this cause be submitted for final decree forthwith without further notice.

WITNESSES:

*P. Byrnes J. White*  
*Lillie M. Franklin*

*Burgis Snyder*  
Respondent

THE STATE OF ALABAMA, }  
Baldwin County }

CIRCUIT COURT

TO MRS. O'BYRNE J. WHITLEY

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 Helen B. Snyder and Augustine Joyner

as witnesses in behalf of Helen B. Snyder in a cause pending in our Circuit Court of Baldwin County, of said State, wherein Helen B. Snyder

is Complainant and Burns Snyder

is Defendant, on oath to be by you administered, upon them

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.

Witness 18th day of January, 19 41.

*R. S. Dush*

REGISTER

Commissioner's Fee \$5.00

Witness' Fees, \$

HELEN B. SNYDER,  
Complainant,  
VS.  
BURNS SNYDER,  
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, Answer and Waiver of the Respondent, 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 said HELEN B. SNYDER shall not again marry, except to the said BURNS SNYDER, 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 BURNS SNYDER, during the pendency of the appeal.

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

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Complainant be restored her maiden name, HELEN BROWN.

Dated at Monroeville, Monroe County, Alabama, this 20<sup>th</sup> day of January, 1941.

J. W. Hare  
Judge of the 21st Judicial Circuit of Alabama.

AMSTER AND WAIVER:

BARCOTFIELD

WILLIAM G. SUNDEN,

Complainant,

vs.

BRUNN'S CIVILIAN,

Respondent.

IN THE CIRCUIT COURT OF

WALKER COUNTY, ALABAMA,

IN SUITY.

*Filed January 18, 1941  
R. S. Durr, Register*

687

RECORDED

Received in Sheriff's Office  
this 8 day of Jan, 1941  
W. R. STUART, Sheriff

Executed  
by serving copy of within  
Complaint on

19  
to

*Burns Snyder*

Complainant,

HELEN B. SNYDER,

VS.

BURNS SNYDER,

Respondent.

*W. R. Stuart*  
By *W. R. Stuart*  
Deputy Sheriff

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

*Filed January 10, 1941*  
*R.S. Ducey, Register*

**RECORDED**

FINAL DECREE OF DIVORCE

HELEN B. SNYDER,

Complainant,

VS.

BURNS SNYDER,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Filed this 21<sup>st</sup> day of January 1941

*R. S. Dicks*

CLERK OF COURT



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

**THE STATE OF ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

**HELEN B. SNYDER**

Complainant

vs.

**BURNS SNYDER**

Defendant

**Commission To Take Deposition**

**COMMISSIONER:**

**O'Byrne J. Whitley**

**Witnesses:**

**Helen B. Snyder**

**Augustine Joyner**

THE STATE OF ALABAMA }  
Baldwin County }

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

HELEN B. SNYDER \_\_\_\_\_ COMPLAINANT

vs.

BURNS SNYDER \_\_\_\_\_ RESPONDENT

I, O'Byrne J. Whitley \_\_\_\_\_

as ~~Register~~ Commissioner \_\_\_\_\_

have called and caused to come before me Helen B. Snyder and Augustine Joyner \_\_\_\_\_

witness es named in the requirement for Oral Examination, on the 18th day of January \_\_\_\_\_

194 1, at the office of Beebe & Hall, \_\_\_\_\_

in Bay Minette \_\_\_\_\_, Alabama, and having first sworn said witness es to speak the

truth, the whole truth, and nothing but the truth, the said Helen B. Snyder \_\_\_\_\_

doth depose and say as follows:

My name is Helen B. Snyder. I live about eight miles from Bay Minette, in Baldwin County, Alabama. I am the Complainant in the case of Helen B. Snyder vs. Burns Snyder.

Burns Snyder and I were married near Atmore, in Escambia County, Alabama, on September 5th, 1939. I had been around the Respondent for only a short time before we married. He is a man of high temperament; that immediately after our marriage, he became dissatisfied, cursed, abused and threatened me and often threatened to do violence to my person; that on one or two occasions while I was in the car with him, he threatened my life and said that he was going to wreck the car and kill me. His conduct was such that it was absolutely impossible for me to live with him, and I had to leave him, and have since leaving him, been living with my folks and they have had to support me. Burns Snyder has contributed nothing toward my support since we were married. On account of his threats and abuses, I was afraid to live with him as his wife, and his conduct was such that I had every reasonable apprehension to believe and did actually believe that if I should live with him as his wife, he would carry out his threats and do further actual violence to my person, which would necessarily endanger my life and health. My name before marriage was Helen Brown.

Helen B. Snyder

AUGUSTINE JOYNER, A WITNESS FOR THE COMPLAINANT, BEING FIRST DULY SWORN, DEPOSES AND SAYS:

My name is Augustine Joyner. I live about one mile from where Helen B. Snyder lives. I am personally acquainted with Helen B. Snyder and Burns Snyder. I know that Burns Snyder is a man of high temperament and at times when mad, is unable to control himself. I have had occasion to see Helen B. Snyder almost daily and know that she has not lived with Burns Snyder and that Burns Snyder has contributed absolutely nothing toward her support. Knowing Burns Snyder as I do and his tempoerament and having been around him when he was mad, I know that it was absolutely im-

I, O'Byrne J. Whitley 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 witnesses 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 18th day of January 1941.

O'Byrne J. Whitley (L. S.)  
Commissioner

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

**THE STATE OF ALABAMA,  
BALDWIN COUNTY**

**IN CIRCUIT COURT, IN EQUITY**

HELEN B. SNYDER,

COMPLAINANT

VS.

BURNS SNYDER,

RESPONDENT

**ORAL DEPOSITION**

Filed January 18th, 1941

R. S. Duvall, Register.

RECORDED IN

Record

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

\_\_\_\_\_, Register

possible for Helen Snyder to live with him as his wife. He is a type of man that often threatens and abuses people around him.

Augustine Snyder

STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. \_\_\_\_\_ Term, 193\_\_\_\_\_

HELEN B. SNYDER \_\_\_\_\_, Complainant

Vs.

BURNS SNYDER \_\_\_\_\_, Defendant

To Hon. R. S. Duck \_\_\_\_\_, Register :

**an Answer and Waiver having been filed by the Respondent,**

In the above stated cause ~~where no answer having been filed by the Respondent,~~  
and evidence having been taken, and the cause being ready for submission for final decree, and ~~no~~

~~answer having been interposed,~~ the Complainant, by Beebe & Hall, \_\_\_\_\_

\_\_\_\_\_ Solicitors 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,**

By: John T. Hall

Solicitor for Complainant.

HELEN B. SNYDER

\_\_\_\_\_

\_\_\_\_\_

VS.

BURNS SNYDER

\_\_\_\_\_

\_\_\_\_\_

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, \_\_\_\_\_  
Service on the Respondent, Answer and Waiver of the Respondent, Commission to  
take Testimony, Testimony of Helen B. Snyder and Augustine Joyner, and Request  
for Decree in Vacation.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

and in behalf of Defendant upon \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

*R. S. Duch*

Register.

**RECORDED**

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

**The State of Alabama**  
BALDWIN COUNTY

**IN EQUITY**  
Circuit Court of Baldwin County

HELEN B. SNYDER,

VS.

BURNS SNYDER,

**NOTE OF TESTIMONY**

Filed in Open Court this 18th

day of January 1934

*R. S. Duch*

REGISTER

**RECORDED**

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

**The State of Alabama,**  
Baldwin County.  
CIRCUIT COURT, IN EQUITY

**HELEN B. SNYDER**

Vs.

**BURNS SNYDER**

**REQUEST FOR DECREE IN  
VACATION**

Filed **January 18th**, 193**41**

*R. S. Durb*

Register.

Recorded in \_\_\_\_\_ Record

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

Register.