Chaffer Peacock.	
	THE STATE OF ALABAMA, BALDWIN COUNTY
VS. G A Peacock.	IN EQUITY CIRCUIT COURT OF BALDWIN COUNTY
This cause is submitted in behalf of Complainan and Testimony of Chaffer. Pea	
nd in behalf of Defendant upon	
Answer & Waiver.	

Register.

The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

			VS.	•	nplainant
	G.	Α.	PEACOCK		spondent
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This cause coming on to be l					
on Respondent s anwer consideration thereof, the Court if for in said bill.	r and w s of the op	ra i: pini	ver and Testimony as on that the Complain	noted by the ant is entitled	Register, and upoto the relief pray
No. 18 September 1997					
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and that the said			r Peacock	· ·	e nereby, disorve
is forever divorced from the sa					
	G.	A.	Peacock	•	
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Chaffer Peacock, Complainant) In the Circuit Court) Baldwin County, Alabama

G. A. Peacock, Respondent

of maid Count Citation

IN EQUITY

To The Honorable F. W. HARE, Judge of said Court, Sitting in Equity: Comes Your Complainant, CHAFFER PEACOCK, and respectfully exhibits this, Her Bill of Complaint against G. A. PEACOCK, and shows unto Your Honor, as follows:

First: Complainant, who is past the age of 21 years, and Respondent, who is also past the age of 21 years, intermarried on June 26th 1915 at Dothan, Alabama, and thereafter have lived together as man and wife within the State of Alabama, until May 15th 1943 at which time they separated because of the allegations hereinafter complained of, both parties being residents of Baldwin County, Alabama, at present, having been such residents since 1926.

Second: For about ten years, Respondent has conducted himself toward the Complainant in such manner as to put her in fear of her life, limb and health; that he has been repeatedly guilty of physical cruelty toward, using abusive and threatening language toward her and has attempted to do great bodily harm to her; that on May 15th 1943, he beat her badly and pursued her with a knife so that she had to run away from her home and to take refuge with friends.

Your Complainant prays that G. A. Peacock, said Respondent, be made Defendant to this Bill and by appropriate process be required to answer the same within the time prescribed by law and to obey such orders and decrees as may be made in the premises.

Your complainant further prays that, upon the hearing of this cause, a decree be rendered forever divorcing Complainant from Respondent, granting Complainant the right to remarry should she so desire and such other, different and further relect as to Your Honor may seem mete and proper.

Solicitor for Complainant

Chaffer Peacock

In Equity

VS

Circuit Court

Baldwin County

Alabama.

G. A. Peacock

Comes the Respondent in the above styled cause and for answer to the Bill ofComplaint saysthat he denies each and every allegation therein contained except such allegations as relate to dates, residence, ages and the existence of said marriage and that he, the said Respondent, is not a member of the armed forces of The United States of America.

Responded further waives notice of demand for oral examination of Complainant's witnesses, the issue of formal commission to take testimony, notice of the time and place of taking same and the right to cross examine or introduce evidence in his owns behalf and agrees that this cause may be submitted for final decree at any time without further notice to him on the pleadings and Complainant's testimony as noted by the Hegister.

Respondent (G. A. Peacock)

State of Alabama, County of Baldwin, ss,

Before me, E. Cramer, a Notary Public in and for said County and State, personally appeared G. A. Peacock, who acknowledged that he executed the foregoing answer with full knowledge of its contents and that he did so voluntarily.

Given under my hand and official seal this 8th day of June, 1943.

(Seal)

Camer

The State of Alabama, Circuit Court of Baldwin County, Alabama Baldwin County.
CHAFFER PEACOCK Complainant.
VS.
G. A. PEACOCK Respondent.
I FRANCES G. CRAWFORD
as Register and Commissioner
have called and caused to come before me Chaffer Peacock and Margaret Louise Underhill

witness es named in the Requirement for Oral Examination, on the 9thday of June
1943, at the office ofE. Cramer, Attorney
Fairhope ,Alabama, and having first sworn said witness es to speak the
truth, the whole truth, and nothing but the truth, the said Chaffer Peacock
doth depose and say as follows:
I am past the age of 21 years and my husband is also past the
age of 21 years. We were married at Dothan, Alabama, on June
26th 1915. We have lived in Fairhope, Alabama, since 1926. For
several years, my husband has been constantly abusive to me. He
has beaten me a number of times until, on May 15th 1943, when he
beat me and chased me out of ourk home with a knife, threatening
to kill me if he caught me. I refused to live with him after that
and we have lived apart ever since. I cannot live with him any
longer. He has gotten so that I am afraid to go to sleep for
fear he would attack me and do me serious harm. I put up with
his treatment for a long time because of our children but now
that they are all away and married or otherwise provided for,
I do not wish to live in fear of my life any longer.
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And the said Margaret Louise Underhill doth depose and say:
I live next door to the Peacocks. I know them well. On May
15th 1943, I saw Mr. Peacock beat Mrs. Peacock and I saw him
run her out of the house and up the street. I saw a knife in h
his hand and hexard heard him say that he would kill her.

ORAL EXAMINATION.					_	
I, Frances J. Cra	unfo	/ // as Register a	and Commis	sioneı	hereby	certify
that the foregoing deposition, on Oral Exam						
of the witness & and read over to. Then	and	they sig	gned the sam	me in	the pres	en ç e of
myself	•	. <i>U</i>				
at the time and place herein mentioned; that		personal know	ledge of per	sonal	identity	of said
witness loor had proof made before me					·	
counsel or of kin to any of the parties to said	•					
I enclose the said Oral Examination in	an enve	elope to the Re	gister of sa	id Co	urt.	
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The State of Alabama, BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

Chaffer Peacock.

vs.

G A Peacock.

NOTE OF TESTIMONY

day of June. 194

Register.

Moore Printing Co.