

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA -- GREETING:

WE COMMAND YOU, that you summon JUDGE SAVAGE to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery jurisdiction within sixty days after the service of the summons, and there to answer, plead or demur without oath to a bill of Complaint, lately exhibited by IDA M. SAVAGE against the said JUDGE SAVAGE, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your execution thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register, of said Circuit Court, this the 6th day of October, 1943.

R.S. Duck
Register.

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IDA M. SAVAGE
COMPLAINANT

VS

JUDGE SAVAGE
DEFENDANT

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

Now comes your complainant, Ida M. Savage, and humbly complaining against the Defendant, Judge Savage, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Defendant are both over twenty-one years of age, and bona fide residents of Baldwin County, Alabama;

2.

That they were married at Bay Minette, Alabama on December 24, 1940, and lived together as husband and wife until September 24, 1943.

3.

That on, to-wit: September 24, 1943, and at various times prior threto the Defandant cursed, threatened and abused the Complainant and did actual violence to her person by striking her which necessarily endangered her life and health; that the conduct of the Defendant was such as to give Complainant every reasonable apprehension.

to believe, and she did actually believe, that if she continued to live with him he would carry out his threats and do violence to her person which would necessarily endanger her life and health.

PRAYER FOR PROCESS.

Wherefore, the premises considered, your Complainant prays that your Honor will, by proper process, make the said Judge Savage party Defendant 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 hereof your Honor will give and grant unto her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Defendant, and that your Honor will give and grant unto her such other, further, different and general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Beebe & Hall

By:

W. C. Beebe
Solicitors for Complainant.

IDA M. SAVAGE,)	
)	IN THE CIRCUIT COURT OF
Complainant,)	BALDWIN COUNTY, ALABAMA.
)	
VS.)	IN EQUITY.
JUDGE SAVAGE,)	
)	
Defendant.)	

Comes the Defendant in the above styled cause and for answer to the Bill of Complaint filed in said cause says:-

FIRST:

In answer to paragraph one of the Bill of Complaint Defendant admits that he and the complainant are both over the age of ^e twenty-one years and are bona fide residents of Baldwin County, Alabama.

SECOND:

In answer to paragraph two of the Bill of Complaint Defendant admits that he and the Complainant were married at Bay Minette, Alabama, on December 24, 1940 and lived together as man and wife until September 24, 1943.

THIRD:

In answer to paragraph three of the Bill of Complaint Defendant most emphatically denies that he cursed, threatened, and abused the Complainant on September 24, 1943 or at any other time, and most emphatically denies that he did violence to her person by striking her, or that his conduct was such as to give her every reasonable apprehension to believe that if she continued to live with him that he would do violence to her person which would necessarily endanger her life and health. The defendant says that when he returned from work on or about September 24, 1943, to the home belonging to the Complainant and in which they were then living, that the complainant had moved his clothes out of the house and denied him the right to come into the house and refused to live with him any longer. The defendant says that the complainant has refused to let him go into the house and get

other personal effects belonging to him that are now in her house and that the Complainant on or about September 24, 1943 abandoned your defendant without just cause or legal excuse, and has filed and refused to live with him since that time.

Hyman & Rosen
Attorneys for Defendant.

1003-

RECORDED

Received in Sheriff's Office
this 6 day of Oct, 1943
W. R. STUART, Sheriff

Filed
Oct. 6, 1943
A.S. Weeks
By G.P.W.

Judge Sawyer
Daugherty
Ch

Executed & Delivered 9th 1943 by
Dennis C. J. of W.H. Dammann
Judge Sawyer
W.R. Stuart