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STATE OF ALABAMA
BALDWIN COUNTY.

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

WE COMMAND YOU, that you summon RUDOLPH SCOTT to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction within thirty days after the service of the summons, and there to answer, plead, or demur without oath to a bill of complaint, lately exhibited by EDITH SCOTT 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 of the law. And we further command that you return this writ with your execution thereon to our said Court immediately upon the execution thereof.

22 day of July, 1944. WITNESS, R. S. DUCK, Register of said Circuit Court, this the

R. S. Duck
Register.

EDITH SCOTT,
COMPLAINANT

VS

RUDOLPH SCOTT,
RESPONDENT

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

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

Now comes your Complainant, EDITH SCOTT, and humbly complaining against the Respondent, Rudolph Scott, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Respondent are both over twenty one years of age, and bona fide residents of Baldwin County, Alabama, living at Summerdale;

2.

That the Complainant and the Respondent were married at Bay Minette, Alabama, on to-wit the 4th day of June, 1941, and lived together as husband and wife until, to-wit, August 5th, 1944;

3.

That on, to-wit, the 5th day of August, and at various times prior thereto, the Respondent cursed, threatened and abused the complainant and on various and sundry occasions did actual violence to her person by striking her, which necessarily endangered her life and health; that the conduct of the Respondent is such as to give the complainant every reasonable apprehension to believe, and she does actually believe, that if she continues to live with him he will carry out

Filed Aug 22 1974
by setting copy of within Summons and
Complaint on

Rudolph Scott

W.R. Stuart Sheriff
By O.B. F. Juarez Deputy Sheriff

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Rudolph Scott
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SUMMONS AND COMPLAINT.

Rudolph Scott
RUDOLPH SCOTT, RESPONDENT

EDITH SCOTT, COMPLAINANT
VS

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