

3564

Betty Ann Burtschi
Complainant

Circuit Court

Baldwin County

vs

Alabama

RB
Donald E. Burtschi
Respondent

In Equity

Comes Donald E. Burtschi and, for answer to the Bill of Complaint in the above titled cause, states that he denies each and every allegation therein contained.

Said Respondent further waives the right to demand for issuance of formal commission to take testimony, the right to cross examine Complainants' witnesses, the right to introduce evidence in his own behalf and agrees the within cause may be submitted for final decree without further notice to him upon Complainants' pleadings and evidence as noted by the Register of Your Honorable Court.

Donald Eugene Burtschi

State of Alabama

County of Baldwin

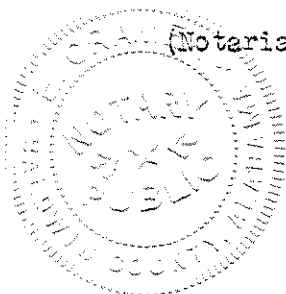
, ss

Personally appeared Donald E. Burtschi, Respondent, known to me, and he acknowledged that he signed the foregoing answer and waiver voluntarily with full knowledge of the contents and purposes thereof.

Given under my hand and seal this *8th* day of *July*, 1955.

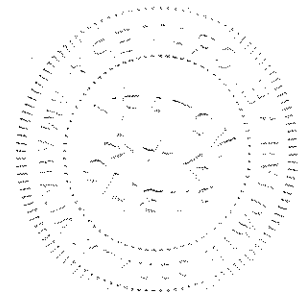
E. Francis
Notary Public

(Notarial Seal)



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FILED
JUL 6 1956
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Betty Ann Burtschi
Complainant

vs

Donald E. Burtschi
Respondent

Circuit Court

Baldwin County

Alabama

In Equity

To the Honorable Hubert M. Hall, Judge of said Court, sitting in
Equity;

Comes Betty Ann Burtschi and exhibits unto Your Honor this, her Bill
of Complaint against Donald E. Burtschi, and respectfully shows unto
Your Honor as follows;

First: Complainant, whose age is 18 years, and Respondent, whose age is
25 years, intermarried March 18th 1954 at Lucedale, Mississippi, and both
parties hereto have been residents of Baldwin County, Alabama, since prior
to the date of said marriage, being for more than one year.

Second: On several occasions since said marriage, Respondent has committed
acts of physical violence upon the person of Complainant so as to put her
in fear of her life, limbs and health and, from his conduct, there is reason-
able apprehension that he might continue so to do.

Third: On or about June 1st 1955, because of the acts hereinabove complained
of, Complainant did quit Respondent and the parties have been living separate
and apart ever since.

Fourth: Complainant's maiden name was Betty Ann Thompson.

The premises considered, Complainant prays that said Donald E. Burtschi be,
by all due and appropriate process, made party defendant to the within suit,
that he be compelled to plead, demur or answer to the several paragraphs
hereof within the time prescribed by law and that he be compelled to abide and
obey all orders and decrees made in the premises.

Complainant further prays, upon a hearing of the within cause, that a decree
be ordered and entered forever divorcing her from said Donald E. Burtschi,
granting her the right to resume the use of her said maiden name, Betty Ann
Thompson, and granting her such other, further, different and general relief
as, in Equity, may appear proper.

E. A. Cramer
Solicitor for Complainant

Betty Ann Burtschi
Betty Ann Burtschi, Complainant