

2342

Beatrice Snyder
Complainant.

Vs.

Donald R. Snyder
Respondent.

IN THE CIRCUIT COURT OF BALDWIN

COUNTY, ALABAMA. IN EQUITY.

ANSWER TO BILL OF COMPLAINT

Comes the respondent in the above styled cause and files the following answer and waiver by the complainant filed herein:

1. Respondent admits each and every material allegation contained in Paragraph One of the Complainant's complaint herein.
2. Respondent admits each and every material allegation contained in Paragraph Two of the Complainant's complaint herein.
3. Respondent denies each and every material allegation in Paragraph Three of said bill of complaint and DEMANDS STRICT PROOF of all material allegations of said paragraph.

WAIVER

The respondent hereto waives any and all further notice or service of process in this cause and stipulates that same may go hence to its final disposition without any notice to him or of any service of process. Respondent hereby specifically waives any and all other or further notice or service herein.

Donald R. Snyder,
Respondent.

Witnesses.

Executed in the

Presence of

C. L. Davis
Notary Public

Beatrice Snyder
Complainant.

Vs.

Donald R. Snyder
Respondent.

RECORDED

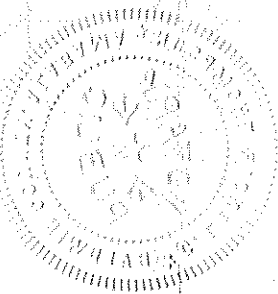
ANSWER AND WAIVER

FILED

AUG 25 1949

ALICE J. DUCK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA



Beatrice Snyder
Complainant.

Vs.

Donald R. Snyder
Respondent.

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

To the Honorable Judge of the Circuit Court of Baldwin County,
Sitting in Equity:

Your complainant, Beatrice Snyder, respectfully represents
and shows unto your Honor:

1. That complainant is over the age of twenty-one years
and is a resident of said State and County, and has been a bona
fide resident of said State for more than one year next preceding
the filing of this bill of complaint; that Donald R. Snyder is
over the age of twenty-one years and resides in Baldwin County,
Alabama.

2. That your complainant and respondent were lawfully mar-
ried on or about, to-wit, September 5, 1932, at Lansing Michigan.

3. Your complainant avers and charges that the said respon-
dent did on or about the 5th day of June, 1949, and many times
subsequent thereto assault, beat, hit and strike complainant; that
said respondent has committed actual violence on her person atten-
ded with danger to her health or life; complainant avers and charges
that respondent has made numerous threats of doing her physical
harm and from his manner and conduct toward her, she is reasonably
convinced that he will commit an actual violence upon her person,
attended with danger to her life or health.

The premises considered, your complainant makes the said
Donald R. Snyder a party respondent to this bill of complaint, and
in order that complainant may have the relief herein prayed for,
may it please your Honor to cause the State's writ of subpoena to
be issued, directed to the said Donald R. Snyder, commanding him
to answer, plead or demur to this bill of complaint, within the time
required by law; and that on a final hearing of this cause, that
your Honor will enter a decreedivorcing your complainant from said
respondent, granting the complainant the right to remarry, and

that your Honor will grant such other, further and different relief
as unto your Honor may seem just and proper, and your complainant
will ever pray.

Arthur C. Egan,
Solicitor for Complainant.

RECORDED
1935

COMPLAINANT
AND DEFENDANT

IN CHANCERY
COURT

FILED
1935

CLERK
COURT

RECORDED ^{no} 2342

BEATRICE SNYDER
Complainant

VS.

DONALD R. SNYDER
Respondent

BILL OF COMPLAINT

FILED

AUG 25 1940

ALICE J. DUCK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA

DIVORCE DECREE

PRINTED BY MOORE PTC. CO.

The State of Alabama, Baldwin County

Circuit Court, In Equity

BEATRICE SNYDER

, Complainant

vs.

DONALD R. SNYDER

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree and Waiver~~ on Answer and Waiver and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and that the said BEATRICE SNYDER is forever divorced from the said DONALD R. SNYDER for and on account of

Cruelty

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Beatrice Snyder the Complainant pay the cost herein to be taxed, for which execution may issue.

This 1st day of September, 1949

Jeffrey J. Marshall
Judge Circuit Court, In Equity

I, _____ Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the _____ day of _____, 19____

Register of Circuit Court, In Equity.

No. _____ Page _____

The State of Alabama
Baldwin County

In Circuit Court, In Equity

Complainant
vs.

Respondent

DIVORCE DECREE

Filed
9-1-49
Alvin L. Duck
Register

BEATRICE SNYDER

vs.
DONALD R. SNYDERTHE STATE OF ALABAMA
Baldwin CountyIN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, _____
testimony of Beatrice Snyder and Jeanette Howe

and in behalf of Defendant upon _____ Answer and Waiver

W. J. Duck
Register.

A. Epperson

No. 2312

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

BEATRICE SNYDER

vs.

DONALD R. SNYDER

NOTE OF TESTIMONY

Filed in Open Court this 25th

day of August, 1949

Alice J. Luck

Register.

Printed by the Baldwin Times

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Beatrice Snyder Complainant

VS.

Donald P. Snyder Respondent

I, Catherine Mason
as Register and Commissioner
have called and caused to come before me Jeanette Howe

witness named in the Requirement for Oral Examination, on the 23rd day of August
1949, at the office of Catherine Mason
in Foley, Alabama, and having first sworn said Witness to speak the
truth, the whole truth, and nothing but the truth, the said Jeanette Snyder
doth depose and say as follows:

I kinda got fed up staying in Michigan so I came with Mrs. Snyder to Alabama. We came down on the bus together. I know that different times he had different women friends because he had some of them come to the house while she was working. Sometimes he would just come home to clean up or eat and then go off and we did not know when he would be back. This particular instance I had been gone for a few days visit and when I came back she told me things had been pretty bad. He was there when I got back. He didn't like anyone speaking about his girl friends and sometimes she would say something about it and this time he slapped her hard and threatened to beat her worse. She went back to Michigan shortly after this incident. I think I would have left him long before she did. This particular instance that I am speaking of, when he hit her so hard, was around the first of June of this year.

Jeanette M. Howe

ORAL EXAMINATION.

I, Catherine Mason, as Register and Commissioner hereby certify that the foregoing deposition—on Oral Examination was taken down by me in writing in the words of the witness—and read over to ~~The witness~~ signed the same in the presence of myself Catherine Mason at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness—or had proom made before me of the identity of said witness—; 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 23rd day of August, 1949.

Catherine Mason (L. S.)
Catherine Mason

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

BEATRICE SNYDER

vs. Complainant

DONALD R. SNYDER

Respondent.

Oral Deposition

Filed _____, 1949

Recorded in _____, Register.

Recorded in

Record

FILED

Vol. AUG 1949 Page _____

Attest J. DUCK, Register, Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Catherine Mason

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 Beatrice Snyder

and Jeanette Hance

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

BEATRICE SNYDER

Complainant

and

DONALD R. SNYDER

Respondent

on oath, to be by you administered, upon August 23, 1949
to take and certify the deposition of the witness and return the same to our Court, with all
convenient speed, under your hand.

Witness 23rd day of August, 1949

Alice J. Hance
Register.

Commissioner's Fee, \$

Witness' Fees, \$

THE STATE OF ALABAMA
Baldwin County.Circuit Court of Baldwin County, Alabama
(In Equity)BEATRICE SNYDER

Complainant

VS.

DONALD R. SNYDER

Respondent

I, Catherine Mason

as Register and Commissioner

have called and caused to come before me Beatrice Snyderwitness named in the Requirement for Oral Examination, on the 23 day of August
1949, at the office of Catherine Masonin Foley, Alabama, and having first sworn said Witness to speak the
truth, the whole truth, and nothing but the truth, the said Beatrice Snyderdoth depose and say as follows:

Don and I were married at Lansing, Michigan, September 5, 1932. We have had trouble a couple of times before when I went so far as to start divorce proceedings against him but he always begged me to go back to him and I did. Don came to Bay Minette, Alabama in February 1948 and bought a garage and I came down in April 1948. He had fixed up a place in his garage to sleep until I came down. We lived in an apartment and it wasn't long before he was making excuses that he was working late and stayed in the garage. I found out he was seeing another woman and he got where he didn't come home for weeks at a time. We were both working and on June 5, 1949 he had come home for a change. He was rather disagreeable and we got to arguing and he struck me across the face and I fell against an open stairway and cut my face and lips. I told him if he was going to continue to run around and leave me alone that I would just go back to Michigan. He said that I had better not mention that other woman again as I had said something about her before he struck me, for if I did, what he had just done was just a sample of what he would do to me. There wasn't anything else for me to do but go home as I know I could not live with him the way things were and we were bound to argue about his other women and he had beat me up one other time awfully bad and it might be worse next time. I am convinced that if I lived with him that he would commit actual violence upon me endangering my health or life.

Beatrice Snyder.

2342

ORAL EXAMINATION.

I, Catherine Mason, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness and read over to her and signed the same in the presence of myself Catherine Mason at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness or had proom made before me of the identity of said witness; 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 23rd day of August, 1949.

Catherine Mason (L. S.)

NO. PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

BEATRICE SNYDER

vs. Complainant

DONALD R. SNYDER

Respondent.

Oral Deposition

Filed _____, 194

Register.

Recorded in

Record

Vol. Page

FILED, Register.

AUG 1949

ALICE J. DUCK, Register