

2526

GLADYS SCHAFF, ) (  
Complainant, ) ( IN THE CIRCUIT COURT OF  
-vs- ) ( BALDWIN COUNTY, ALABAMA  
LAWRENCE SCHAFF, ) ( IN EQUITY  
Respondent. ) (

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT  
COURT OF BALDWIN COUNTY, Sitting in Equity:

Your complainant, Gladys Schaff, 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 Lawrence Schaff is over  
the age of twenty-one years and is a resident of Baldwin County,  
Alabama.

2. That your complainant and respondent were lawfully  
married on or about, to-wit, August 17, 1945, after having been  
previously married and divorced.

3. Your complainant avers and charges that the said  
respondent did assault, beat, hit and strike complainant; that  
said respondent has committed actual violence on her person attend-  
ed with danger to her life or health; 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 on her person,  
attended with danger to her life or health.

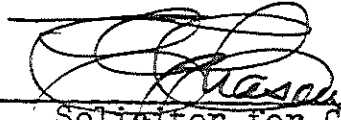
4. Complainant shows that there were born unto your  
complainant and respondent of this marriage four children, Wiley  
Schaff, age fifteen; Barbara Schaff, age eleven; Patricia Schaff,  
age nine; and Sandra Schaff, age two and one-half years, which  
said children are in the custody and control of your complainant,  
and of which said children, complainant desires custody and con-  
trol.

5. Complainant further alleges that respondent is regu-  
larly employed at a wage of \$1.85 per hour and is financially able to  
pay the sum of Five Dollars (\$5.00) per week as support for each of  
the

four said minor children, and complainant also alleges that respondent is financially able to pay the sum of \$100.00 as her attorney's fees.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED: Your complainant prays that Lawrence Schaff be made a party defendant to this cause by the usual process of this Honorable Court, requiring him to plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the statutes in such cases made and provided; that upon a final hearing of this cause, that your complainant be granted a divorce from said respondent; that your Honor will grant to the complainant legal custody of the minor children of this marriage, Wiley Schaff, Barbara Schaff, Patricia Schaff and Sandra Schaff, and will direct the respondent to pay the sum of Five Dollars (\$5.00) per week as support for each of the said minor children; and that your Honor will direct the respondent to pay the sum of One Hundred Dollars (\$100.00) as attorney's fees to complainant's solicitor of record. Should your complainant be mistaken in the relief prayed for, that there be granted to her such other, different and general relief to which she may be entitled, and as in duty bound, she will ever pray.

  
Solicitor for Complainant

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2526.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon LAWRENCE SCHAFF

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in  
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against \_\_\_\_\_

LAWRENCE SCHAFF \_\_\_\_\_, Defendant .....

by GLADYS SCHAFF \_\_\_\_\_

\_\_\_\_\_, Plaintiff.....

Witness my hand this 12th day of August 19 50

Alfred. Duck \_\_\_\_\_, Clerk

No. ....

Page .....

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT**

vs.

Plaintiffs

Defendants

**SUMMONS and COMPLAINT**

Filed ....., 19.....

....., Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

....., 19.....

....., Sheriff

I have executed this summons

this ....., 19.....

by leaving a copy with

..... Sheriff

..... Deputy Sheriff

GLADYS SCHAFF

COMPLAINANT

VS

LAWRENCE SCHAFF

RESPONDENT

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

NO. 2526

Now comes the Respondent and for answer to the Complainant's bill of complaint says:

1.


He admits the allegations contained in paragraphs one and two.

2.

He denies the allegations contained in paragraphs three, four and five. and demands strict proof of the same.

3.

He denies each and every allegations contained in the bill of complaint not herein specifically admitted and demands strict proof of the same.

  
Solicitor for the Respondent

25-26

RECORDED

GLADYS SCHAFF

COMPLAINANT

VS

LAWRENCE SCHAFF

RESPONDENT

ANSWER

FILED

SEP 7 1950

ALICE J. DUCK, Register