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The State of Alabama,
Baldwin County.

} Circuit Court of Baldwin County, In Equity.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon

Edward Faulk,

of Baldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Essie Faulk,

against said Eddie Faulk,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 5th, day of

April 1927.

T. W. Richerson Register.

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

2 Original

SERVE ON _____

Circuit Court of Baldwin County
In Equity.

No. _____

SUMMONS

Essie Faulk,

vs.

Eddie Faulk,

Rickarby, Beebe & Hall.

Solicitor for Complainant

Recorded in Vol _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this 5th,

day of April 1927

J. W. Hadley
Sheriff.

Executed this Fifth day of

April 1927

by leaving a copy of the within Summons with

Edward Faulk
Defendant.

J. W. Hadley
Sheriff.

By J. P. Whites
Deputy Sheriff.

RECORDED

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA. IN EQUITY.

Comes your Complainant, Essie Faulk, and humbly complaining
against Edward Faulk respectfully shows unto your Honor as follows:

FIRST:

That your Complainant is a resident of Baldwin County, Alabama,
and has been for more than three years next preceding the filing of this bill
and that she is over the age of twenty-one years; that the Respondent, Edward
Faulk, is a resident of Bay Minette, Baldwin County, Alabama, and over the age
of twenty-one years.

SECOND:

That the Complainant and the Respondent are wife and husband,
having intermarried at Dyas, Baldwin County, Alabama, on or about, to-wit: October
10, 1913; that they lived together as man and wife in Baldwin County, Alabama,
until on or about, to-wit: March 27, 1927.

THIRD:

That the Respondent, Edward Faulk, is of a brutal temperament;
that on, to-wit: March 27, 1927, and various other dates, he abused the Complain-
ant and that on to-wit, the 27th day of March, 1927, the Respondent mistreated
the Complainant by choking and striking her several blows; that the Respondent
from time to time cursed and abused the Complainant, calling her vile names and
on several occasions threatened to kill her; that he was so disagreeable that it
was impossible for the Complainant to live with him; that from the conduct of
the Respondent as aforesaid, the Complainant has reasonable apprehension to
believe, and does believe, that he will do violence to her person and that he will
execute the threat made by him and either kill her or do her bodily injury danger-
ous to her life or health should she continue to live with him; that all of the
acts above recites of the Respondent were without any fault whatever on the part
of the Complainant.

FOURTH:

That there were born to your Complainant and the Respondent, by said marriage, three children, namely: Houston Faulk, a son, eleven years of age; Ida Faulk, a daughter, seven years of age and Charles Faulk, a son, six years of age; that said children reside with your Complainant; that the Respondent, Edward Faulk, is not a fit person to have the control of said children.

PRAYER:

The premises considered, your Complainant prays that a summons be issued directed to the said Edward Faulk requiring him to plead, answer or demur to your Complainant's bill of complaint within the time required by law and the practice of this Honorable court; and that upon the final hearing of said cause your Honor will grant to your Complainant a decree of absolute divorce from the said Edward Faulk and will give and grant unto your Complainant the custody and control of the said children and that such other, further, different or general relief may be granted to your Complainant as your Honor may deem fit and proper.

Essie Faulk
Rickey Beebe Hall
Solicitors for Complainant.

FOOT NOTE:

The Respondent, Edward Faulk, is required to answer each paragraph of the foregoing bill numbered first to fourth, inclusive, but not under oath. Oath is hereby expressly waived.

Essie Faulk
Rickey Beebe Hall
Solicitors for Complainant.

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RECORDED

Filed this 5th day
of March, 1929.

T. W. Richardson
Register

January 18th, 1928.

Hon. T. W. Richerson,
Clerk, Circuit Court,
Bay Minette, Alabama.

Dear Mr. Richerson:

IN RE FAULK VS FAULK:

You will please dismiss the case of
Essie Faulk vs Edward Faulk, heretofore filed in
the Circuit Court of Baldwin County, Alabama, on March
5th, 1927. Case #665.

Yours very truly,

Rickarby, Beebe & Hall,

By *Sturteell*

As Attorneys for Essie Faulk.

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Filed Jan 18/928
T. M. ...
Project

RECORDED