

# The State of Alabama.

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| answer, plea   | ad or dem  | iur, with                                       | out oat   | h, to a B   | ill of Co   | omplain  | t lately   | exhibite   |  |
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|                | all in no wise<br>endorsement  | all in no wise omit, und<br>endorsement thereon | all in no wise omit, under penale endorsement thereon, to our s | all in no wise omit, under penalty, etc. endorsement thereon, to our said Cou | all in no wise omit, under penalty, etc. And we endorsement thereon, to our said Court imme | all in no wise omit, under penalty, etc. And we further endorsement thereon, to our said Court immediately | all in no wise omit, under penalty, etc. And we further commendered endorsement thereon, to our said Court immediately upon the  | all in no wise omit, under penalty, etc. And we further command the endorsement thereon, to our said Court immediately upon the execu  | and perform what said Judge shall order and direct in that behalf. And the all in no wise omit, under penalty, etc. And we further command that you rendorsement thereon, to our said Court immediately upon the execution there T. W. Richerson, Register of said Circuit Court, this |

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

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| SERVE ON   | THE STATE OF ALAR   |
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| Circuit Court of Baldwin County In Equity        | BALDWIN COUNTY  |
| No   | Received in office this   |
| SUMMONS  | day of  |
| Low Deceptor                                     | Executed this College |
|  | By Mary March   |
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| Solicitor for Complainant  Recorded in Vol. Page |   |

## BAMA,

| ceived in office this — | 3000            |
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|                         | Sheriff.        |
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| ٠.                      | `.<br>          |
| COM Dla                 | Defendant,      |
| (1/1/ 0/1/20)           | Sheriff.        |
| ROWN                    |                 |
|                         | Deputy Sheriff. |
|                         |                 |

| Hugy Shaffer, Complainant.  Robert Shaffer, Defendant.  In this cause it appears to the Fegister that a summons requiring the Defendant. Robert. Shaffer  to appear and demor, plead to or answer the Bill of Complaint in this cause within thirty day after the service of said Summons upon Robert. Shaffer,  was served upon by the Sheriff of Pelchin County, Alabama, on the 30th day of Jenuary 19.51.  And the said Defendant baying failed to demur. plead to or answer the said Bill of Complains to this date, it is now, therefore, on motion of H.D. Moorer, Atty for Complainant ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all thing taken as confessed against the said. Robert Shaffer,  Defendant, sforesai  This 252d, day of bierch 19.31. | The State of Alabai Baldwin County.          | ma,                                   | No. 916.                      | CIRCUI                                 | T COURT                                 | IN EQUITY.                              |
|--|--|---------------------------------------|-------------------------------|--|---|---|
| Robert Shaffer,  In this cause it appears to the Fegister that a summons requiring the Defendant Robert Shaffer  to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty day after the service of said Summons upon Robert Shaffer,  was served upon him by the Sheriff of Belewan County, Alabama, on the 30th day of January 19 31.  And the said Defendant having failed to demur, plead to or answer the said Bill of Complainent to this date, it is now, therefore, on motion of F.D.Moorer, Atty for Complainent ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all thing taken as confessed against the said Robert Shaffer;  Defendant, aforesain This Rand, day of March 19.31.  |  | Tuev S                                | haffer.                       |  | £                                       |   |
| Robert Sheffer,  In this cause it appears to the Register that a summons requiring the Defendant Robert Sheffer  to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty day after the service of said Sammons upon Robert Sheffer,  was served upon him by the Sheriff of Beldwin County, Alabame, on the 30th day of January 19 31.  And the said Defendant baving failed to demur, plead to or answer the said Bill of Complain to this date, it is now, therefore, on motion of H.D. Moorer, Atty for Complainer' ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all thing taken as confessed against the said Robert Sheffer,  Defendant aforesai This Rand day of March 19.31.   |  |                                       | ⊽s.                           |  | C                                       | omplainant                              |
| to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty day after the service of said Summons upon   |  |                                       |                               | * 11<br>11 si                          | ::<br>::<br>                            | Defendant                               |
| to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty day after the service of said Summons upon Robert Shaffer,  was served upon him by the Sheriff of Belgwin Oounty, Alabama, on the 30th day of January 19.31.  And the said Defendant having failed to demur, plead to or answer the said Bill of Complain to this date, it is now, therefore, on motion of H.D.Moorer, Attly for Complainent ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all thing taken as confessed against the said Robert Shaffer.  Defendant aforesain This 23rd, day of March 19.31.  | In this cause it appears to the              | R                                     | egister                       | •                                      | . <b> </b>                              |   |
| to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty day after the service of said Summons upon   | that a summons requiring the Defend          | dant_Rob                              | ert Shaffe                    | er                                     | ·                                       |   |
| to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty day after the service of said Summons upon   |  | · • • • • • • • •                     |                               |  |   |   |
| to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty day after the service of said Summons upon   |  |                                       |                               |  |   |   |
| to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty day after the service of said Summons upon   |  | • • • • • • • • •                     |                               |  |   |   |
| to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty day after the service of said Summons upon   | •••••  |                                       | ••                            |  |   | ••••••                                  |
| to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty day after the service of said Summons upon   | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,      |                                       | •• -••••                      |  |   |   |
| to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty day after the service of said Summons upon   |  | · · · · · · · · · · · · · · · · · · · | •••••                         |  |   |   |
| to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty day after the service of said Summons upon   |  |                                       | ** 7******                    |  |   |   |
| after the service of said Summons upon   | ***************************************      |                                       | • • • • • • • • •             |  |   |   |
| after the service of said Summons upon   |  |                                       | *******                       |  |   |   |
| was served uponhimby the Sheriff of Beldwin County, Alabama, on the 30thday of 19 31.  And the said Defendanthaving failed to demur, plead to or answer the said Bill of Complains to this date, it is now, therefore, on motion of H.D.Moorer, Atty for Complainant ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all thing taken as confessed against the saidRobert _Sheffer,  Defendantaforesai Defendantaforesai Defendantaforesai Defendantaforesai 19 31.  | to appear and demur, plead to or an          | swer the H                            | Bill of Complai               | int in this                            | cause with                              | in thirty days                          |
| And the said Defendant. baving failed to demur, plead to or answer the said Bill of Complain to this date, it is now, therefore, on motion of H.D.Moorer, Atty for Complainant ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all thing taken as confessed against the said. Robert-Sheffer,  Defendant aforesai   | after the service of said Summons u          | pon                                   | Robert-S                      | haffer,                                |   |   |
| And the said Defendant. having failed to demur, plead to or answer the said Bill of Complains to this date, it is now, therefore, on motion of   | was served upon him by the 30th day of Janua | e Sheriff o                           | <sup>f</sup> -Baldwin<br>1919 | 31.                                    | County, .                               | Alabama, on the                         |
| And the said Defendant baving failed to demur, plead to or answer the said Bill of Complain to this date, it is now, therefore, on motion of H.D.Moorer, Atty for Complainant ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all thing taken as confessed against the said Robert Shaffer,  Defendant aforesai  This 25rd, day of March 19.31.   |  |                                       |                               |  |   |   |
| And the said Defendant baving failed to demur, plead to or answer the said Bill of Complainers to this date, it is now, therefore, on motion of H.D.Moorer, Atty for Complainers ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all thing taken as confessed against the said Robert Shaffer.  Defendant aforesai This 23rd, day of March 19.31.   | ***************************************      | ****                                  | •••••                         |  |   | g a g a a a a a a a a a a a a a a a a a |
| to this date, it is now, therefore, on motion of H.D.Moorer, Atty for Complainent ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all thing taken as confessed against the said Robert-Shaffer,  Defendant aforesai  This 23rd, day of March 19.51.   |  |                                       |                               |  |   |   |
| ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all thing taken as confessed against the saidRobert-Shaffer,  | And the said Defendant having                | g laned to                            | demur, plead<br>H.D.Mo        | orer. At                               | ty for (                                | omplainant                              |
| ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all thing taken as confessed against the saidRobert-Shaffer,  | •  |                                       |                               |  |   |   |
| taken as confessed against the saidRobert - Shaffer,   | •      |                                       |                               |  |   |   |
| Defendant aforesai This 23rd, day of March 19-31.  |  |                                       |                               |  |   |   |
| Defendant_aforesai This 23rd, day of March 19-31.  | •  |                                       |                               |  |   |   |
| Defendant aforesai This 23rd, day of March 19.31.  | ·  |                                       |                               |  |   |   |
| Defendant aforesai  This 23rd, day of March 19.31.   | •  |                                       |                               |  |   |   |
| Defendant_aforesai This 23rd, day of March 19-31.  |  |                                       |                               | ······································ | *************************************** |   |
| Defendant aforesai  This 23rd, day of March 19.31.   | ••••   |                                       |                               |  |   |   |
| Defendant_aforesai  This 23rd, day of March 19.31.   |  |                                       |                               |  |   |   |
| Defendant_aforesai  This 23rd, day of March 19.31.   |  |                                       |                               |  |   |   |
| This 23rd, day of March 19.31.   |  |                                       |                               |  |   | •                                       |
| This 23rd, day of March 19.31.   |  |                                       |                               |  |   |   |
| This 23rd, day of March 19.31.   | ,  |                                       |                               |  |   |   |
| This 23rd, day of March 19.31.   |  |                                       |                               |  |   | dant_aforesaid.                         |
| Kegiste  | This 23rd, day                               | of                                    | March                         | len                                    | 19.31.                                  | Register                                |

| No. 916.                        | Page       |       | :<br>      |               |
|---------------------------------|------------|-------|------------|---------------|
| The State of                    |            |       | ıma        | 1,            |
| CIRCUIT COUR'                   | r, in      | EQ    | UIT        | Y             |
| Lucy Shaffer                    |            |       | ·.<br>·    |               |
| 1 4 m                           |            |       |            |               |
| vs.<br>Robert Shaffer           |            |       |            |               |
|                                 |            |       | ********** |               |
| DECREE PRO CO                   |            |       | ON         | <u>hat an</u> |
| March 23rd,                     |            |       | . 19.      |               |
| Mr Olice                        | J2-1-      | 52    | ~          | -             |
|                                 | F          | legis | ter.       | The way       |
| loore Printing Company, Bay Min | etto, Ala. | :     |            |               |

STATE OF ALABAMA, BALDWIN COUNTY.

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

Your Oratrix, Lucy Shaffer, respectfully represents and shows unto your Honor as follows:

#### FIRST:

That she is a bona fide resident of Baldwin County, Alabama, residing at Stockton in said County, and has resided in Baldwin County for more than three years next preceding the filing of this bill; that she is over the age of nineteen years.

### SECOND:

That Robert Shaffer is a resident of Stockton, Alabama and is over the age of twenty-one years.

#### THIRD:

That your Oratrix and the said Robert Shaffer were lawfully married and lived together as husband and wife until April 1929 at which time the said Robert Shaffer was so cruel to your Oratrix as to endanger her life and health, and that from the conduct of the said Robert Shaffer, your Oratrix had reasonable apprehension that her life and health were in danger and that the said act was committed in Baldwin County, Alabama.

THE PREMISES CONSIDERED Your Oratrix respectfully prays that the said Robert Shaffer be made party respondent to this Bill of Complaint by the usual process of this Honorable Court; That such orders, decrees

and publications, be made on the said Robert Shaffer as necessary to perfect service on him, and that he be required to demur, plead to or answer the same within the time and under the penalties as provided by law, or that the same be forever confessed.

## PRAYER FOR RELIEF:

Upon the final hearing of this cause, Your Honor will grant unto your Oratrix, an absolute divorce from the said Robert Shaffer.

That if your Oratrix is mistaken in the relief prayed for then your Honor will grant unto her such other, further, different and general relief as she may in justice and equity be entitled, she will ever pray, etc..

HENRY D. MOORER, Attorney for Complainant.

### FOOT NOTE:

Defendant is required to answer every allegation contained in the foregoing bill, paragraph one to three inclusive, but not under oath. Answer under oath is hereby expressly waived.

> HENRY D. MOCRER, Attorney for complainant.