

916

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

*Robert Shaffer*

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

*Lucy Shaffer*

against said

*Robert Shaffer*

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 24th day of

*T. W. Richerson* 1931

*T. W. Richerson* Register

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

*Aug 1931*

SERVE ON \_\_\_\_\_  
Circuit Court of Baldwin County  
In Equity

No. \_\_\_\_\_

SUMMONS

*Leroy Sheaffer*

vs.

*Robert Sheaffer*

*H. D. Brown*  
Solicitor for Complainant

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Received in office this *8th*  
day of *June* 19*31*

Sheriff.

Executed this *8th* day of  
*January* 19*31*  
by leaving a copy of the within Summons with

*Robert Sheaffer*

Defendant.

*W. R. Stuart*

Sheriff.

By *R. D. Phaulk*  
Deputy Sheriff.

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

The State of Alabama, { No. 916. CIRCUIT COURT IN EQUITY.  
Baldwin County.

Lucy Shaffer, Complainant  
vs.  
Robert Shaffer, Defendant

In this cause it appears to the Register  
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 days  
after the service of said Summons upon Robert Shaffer,  
was served upon him by the Sheriff of Baldwin County, Alabama, on the  
30th day of January 1931.

And the said Defendant having failed to demur, plead to or answer the said Bill of Complaint  
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 things  
taken as confessed against the said Robert Shaffer,

Defendant aforesaid.  
This 23rd day of March 1931.  
Register.

No. 916.

Page.....

**The State of Alabama,**  
Baldwin County.

**CIRCUIT COURT, IN EQUITY**

Lucy Shaffer

vs.

Robert Shaffer

**DECREE PRO CONFESSO ON  
PERSONAL SERVICE**

Issued March 23rd, 1931. 19

*W. R. [Signature]*  
Register.

STATE OF ALABAMA,  
BALDWIN COUNTY.

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

TO THE HONORABLE F. W. HARE, JUDGE OF 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 mar-  
ried 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 en-  
danger 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.

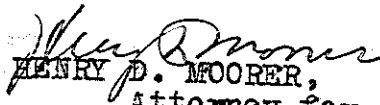
THE PREMISES CONSIDERED Your Oratrix respectfully prays that the  
said Robert Shaffer be made party respondent to this Bill of Complaint  
by the usual process of this Honorable Court; That such orders, decrees

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. MOORER,  
Attorney for Complainant.