

TO THE HON. F. W. HART, JUDGE OF THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA, IN EQUITY:

Comes your Complainant, JOHN ZOLLIKOFER, and humbly complaining against ELIZABETH ZOLLIKOFER, respectfully represents and shows unto your Honor as follows:

FIRST:

That he is a bona fide resident of Lillian, in Baldwin County, Alabama, and has been for more than one year next preceding the filing of this bill; that he is over twenty-one years of age; that the respondent, Elizabeth Zollikofer, is over the age of twenty-one years and a non-resident of the State of Alabama, her address being Russellton, Pennsylvania, care of Charles Spondike, Sr.

SECOND:

That your Complainant and the Respondent are husband and wife, having married in Pensacola, Florida, on July 17, 1924; that they lived together as husband and wife in Baldwin County, Alabama, until in July, 1929.

THIRD:

That in July, 1929, the Respondent voluntarily and without any fault on the part of the Complainant left him and since that time has remained away from him voluntarily and continuously.

PRAYER FOR PROCESS.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Elizabeth Zollikofer party respondent to this Bill of Complaint, requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

PRAYER.

Your Complainant further prays that upon a final hearing of this cause your Honor will grant unto him a decree of ab-

solute divorce, forever barring the bonds of matrimony existing between him and the said Elizabeth Zollikofer, and that your Honor will give and grant unto him such other, further, different or general relief as he may in equity and good conscience be entitled to receive. And as in duty bound your Complainant will ever pray.

Beebe + Stale

Solicitor for Complainant.

FOOT NOTE:

The Respondent is required to answer each and every allegation contained in the foregoing Bill of Complaint in Paragraphs FIRST to THIRD inclusive, but not under oath, oath being hereby expressly waived.

Beebe + Stale

Solicitor for Complainant.

RECORDED  
ORIGINAL.

JOHN ZOLLIKOFFER,  
Complainant,

vs.

ELIZABETH ZOLLIKOFFER,  
Respondent.

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

BILL FOR DIVORCE.

*Filed Aug 8/1931  
J M McKeown  
Registrar*

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BEEBE & HALL  
LAWYERS  
BAY MINETTE, ALABAMA

**The State of Alabama**  
Baldwin County

Circuit Court of Baldwin County, Alabama,  
(In Equity)

John Zollikofer

COMPLAINANT

VS.

Elizabeth Zollikofer

RESPONDENT

I, T. W. Richerson

as Register and Commissioner

have called and caused to come before me John Zollikofer, Henry Zollikofer and Michael Meszaros

witnesses named in the Requirement for Oral Examination, on the 25 day of September

19 31, at the office of T. W. Richerson

in Bay Minette, Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said John Zollikofer

doth depose and say as follows:

My name is John Zollikofer. I am a resident of Baldwin County, Alabama, over twenty-one years of age. I have been a bona fide resident of Baldwin County, Alabama, for more than five years next preceding the filing of the bill of complaint in this cause. Elizabeth Zollikofer and I were married at Pensacola, Florida, on July 17th, 1924 and lived together as man and wife in Baldwin County, Alabama, until the latter part of July, 1929. During the latter part of July 1929, the said Elizabeth Zollikofer voluntarily and of her own free will and without any fault on my part left me and ceased to live with me as a wife, and has remained away voluntarily and continuously since that time. I, at all, times while we lived together treated Elizabeth and provided for her as as dutiful husband should. I ~~at~~ treated her at all times as best I could and provided her with a home until she left me. I have since she left me, talked with her about resuming our marital relations, but she has repeatedly stated that she does not care to and will not live with any longer.

Elizabeth Zollikofer is now living in Russellton, Pennsylvania, with her parents, and has since she went away, repeatedly ~~talked~~ written me that she does not intend to, and will never return to live with me.

*John Zollikofer*

Henry Zollikofer, a witness for the Complainant, having been duly sworn, deposes and says:

My name is Henry Zollikofer. I am a resident of Lillian, Baldwin County, Alabama. I was acquainted with John Zollikofer and Elizabeth Zollikofer during the whole time that they lived together as man and wife. They were married in Florida in 1924, and lived in Baldwin County, Alabama, until Elizabeth left John and refused to longer live with him. I lived right in the same neigh-

borhood with John Zollikofer and his wife Elizabeth during the time that they lived together as man and wife, and know that at all times John, so far as knew or heard, treated her as best he could and at all times provided her with all the necessities of life and cared for as he should. During the latter part of July 1929, Elizabeth ceased to live with John of her own free will and accord and many times heard her state that she did not care to and would not live with him any longer. They were living in Baldwin County, Alabama, at the time she went away and left John. She has remained away continuously since leaving him. John, since Elizabeth left him has been living right with his folks, and I have been in the home and have seen John almost every day since she went away. She is now somewhere in Pennsylvania.

Henry Zollikofer

Michael Meszaros a witness for the Complainant being duly sworn, deposes and says:

My name is Michael Meszaros. I live at ~~Millan~~ in Baldwin County, Alabama. I knew John Zollikofer and Elizabeth Zollikofer during the time that they lived together as man and wife. I lived about three or four miles from where they lived, and often visited with them. Some time during the latter part of July 1929, Elizabeth left John and so far as I know has remained away continuously since. I often visited with them, and so far as I ever knew or heard know of no reason why she left him. It always seemed to me that he treated and provided for her as best he could. I know that John and Elizabeth have not lived together since the latter part of July 1929, as man and wife.

Michael Meszaros

ORAL EXAMINATION

I, T. W. Richerson, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness es and read over to them and they signed the same in the presence of myself H. M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof made before me of the identity of said witness es; 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 35th day of September 19 31.

T W Richerson (L. S.)

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

**The State of Alabama**  
**BALDWIN COUNTY**

**IN CIRCUIT COURT, IN EQUITY**

\_\_\_\_\_  
VS. \_\_\_\_\_  
COMPLAINANT

\_\_\_\_\_  
RESPONDENT

**ORAL DEPOSITION**

Filed Sept 25 1931, 1931

RECORDED IN

T W Richerson, Register

\_\_\_\_\_  
Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

\_\_\_\_\_  
Register

John Zolikofer,

vs.

Elizabeth Zollikoffer,

CIRCUIT COURT OF  
Baldwin County.

IN EQUITY.

In this cause it being made to appear to the Register that on the 8th  
day of August, 1923, a copy of the Bill of Complaint filed in this cause was  
sent to Elizabeth Zollikoffer,

Defendant, by registered mail, postage prepaid, marked "For delivery only to the person to whom  
addressed," and return receipt demanded addressed to the Register of this Court; and that on the  
15th day of August, 1921, such receipt was duly  
received and filed in this cause:

And it further appearing to the Register that the said Defendant has failed to plead, answer  
or demur to the said Bill to the date hereof, it is now, therefore, on motion of Complainant, ordered,  
adjudged and decreed by the Register that the said Bill of Complaint be, and it hereby is in all  
things taken as confessed against the said Elizabeth Zollikoffer,

Defendant.

This the 21st day of September, 1931.
  
Register.

WEEK END

RECORDED

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

CIRCUIT COURT OF BALDWIN  
COUNTY, ALA.

In Equity.

John Zollikoffer

vs.

Elizabeth Zollikoffer

Decree Pro Confesso After  
Notice By Registered Mail.

Filed in office this 21st day of

Sept. 1931 192

*D. W. McArthur* Register

Entered in O. B. Page

MOORE PTG CO.



**The State of Alabama,** { **CIRCUIT COURT OF BALDWIN COUNTY,**  
**Baldwin County** { **IN EQUITY**

**To Any Sheriff of the State of Alabama---GREETING:**

WE COMMAND YOU, That you summon\_\_\_\_\_

**Elizabeth Zollikofer**

**c/o Charles Spondike, Sr.**  
**Russellton, Pennsylvania**

of \_\_\_\_\_ 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

**John Zollikofer**

against said \_\_\_\_\_

**Elizabeth Zollikofer**

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 8th day of

August 1931

\_\_\_\_\_  
 Register.

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

ORIGINAL

Serve on Elizabeth Zollikofer

Circuit Court of Baldwin County  
In Equity.

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

**SUMMONS**

John Zollikofer

vs.

Elizabeth Zollikofer

Beebe & Hall

Solicitor for Complainant.

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

**The State of Alabama,**  
BALDWIN COUNTY.

Received in office this \_\_\_\_\_

day of \_\_\_\_\_ 193

Sheriff.

Executed this \_\_\_\_\_ day of \_\_\_\_\_

193

by leaving a copy of the within Summons with \_\_\_\_\_

Defendant.

Sheriff.

By \_\_\_\_\_ Deputy Sheriff.

*Handwritten:*  
Copy of Summons  
sent Elizabeth Zollikofer  
of Charles Spensley, Esq.  
Execution Pa.

JOHN ZOLLIKOFFER,  
Complainant,  
vs.  
ELIZABETH ZOLLIKOFFER,  
Respondent.

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

NO. 988.

This cause coming on to be heard, was submitted upon the original Bill of Complaint, pleadings and proof 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 the respondent be and the same are hereby dissolved, and the complainant is forever divorced from the respondent on the ground of voluntary abandonment.

It is further ORDERED that the said John Zollikofer be and he is hereby permitted to again contract marriage upon the payment of the costs of court in this cause.

It is further ORDERED that the said John Zollikofer pay the costs herein taxed, for which execution may issue.

It is further ORDERED, ADJUDGED AND DECREED that the said John Zollikofer shall not again marry, except to the said Elizabeth Zollikofer, until sixty days after this date, and that if an appeal is taken within sixty days, he shall not marry again, except to the said Elizabeth Zollikofer, during the pendency of the appeal.

Dated at Bay Minnute, Alabama, on this the 30<sup>th</sup>  
day of September, 1931.

J. W. Hare  
Judge of the Circuit Court of  
Baldwin County, Alabama.

**RECORDED**  
ORIGINAL.

JOHN ZOLLIKOFFER,  
Complainant,

vs.

ELIZABETH ZOLLIKOFFER,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY.  
NO. 988.

DECREE OF DIVORCE.

*Filed Sept 30th/1931  
J W Williams  
Registrar*

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BERNIE & HALL

LAWYERS

BAY MINETTE, ALABAMA

NO. 1

1941-1942

1941-1942

1941-1942

1941-1942

1941-1942

1941-1942

1941-1942

1941-1942

1941-1942

1941-1942



# RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original of which appears on the face of this Card.

DATE OF RETURN: \_\_\_\_\_

SIGNATURE OF POSTMASTER: \_\_\_\_\_

Date of delivery: \_\_\_\_\_  
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