

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 Albert E. Schalkenbach

Taconic Lake, Petersburg, New York,

of New York ~~County~~ 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 Sum-
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by
Cora Schalkenbach

against said

Albert E. Schalkenbach,

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

March, 193 3

T. W. Richerson Register

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

Original

RECORDED

SERVE ON _____

Circuit Court of Baldwin County
In Equity

No. 1103

SUMMONS

Cora Schalkenbach

vs.

Albert E. Schalkenbach,

E.G. Rickarby, Robertsdale Ala.
Solicitor for Complainant

Recorded in Vol. _____ Page _____

RECORDED

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____ 19____

Sheriff

Executed this _____ day of _____

19____

by leaving a copy of the within Summons with _____

Defendant

Sheriff

By _____

Deputy Sheriff

Mar 24th/1933
Copy of Summons &
Copy of bill of lading
Deft Mar 24-33
D. W. Ricker
Address
Tacoma Lake
Returning New York

Bra
~~MR. A. E. SCHALKENBACH~~, : IN THE CIRCUIT COURT
 COMPLAINANT, : OF
 -vs- : BALDWIN COUNTY,
 MR. A. E. SCHALKENBACH and : ALABAMA.
 MR. A. P. SCHALKENBACH, : IN EQUITY.
 RESPONDENTS, :
 :

Come the Respondents in the above styled cause and demur to the Bill of Complaint as filed herein on the following separate and several grounds, to-wit:

(1) Because said Bill of Complaint contains no equity.

(2) For aught appearing from said Bill of Complaint the Complainant and A. E. Schalkenbach were never lawfully married.

(3) Because said Bill of Complaint does not allege sufficient facts to show that the Respondent, A. E. Schalkenbach owed the Complainant any duty to support and maintain her.

(4) For aught appearing from said Bill of Complaint the Complainant and Respondent, A. E. Schalkenbach, never assumed the obligation or duties of the relationship of man and wife.

Smith & Johnston
 SOLICITORS FOR RESPONDENTS

CORA H. SCHALKENBACH
Complainant.

No. 1103 $\frac{1}{2}$

vs.

E Q U I T Y

ALBERT E. SCHALKENBACH et al.
Defendants.

CIRCUIT COURT OF
BALDWIN COUNTY ALABAMA.

Comes the Complainant and in consideration of the dismissal contemporaneously herewith of the suit heretofore filed against her under the name of Cora Hines in the Law Side of this Court, hereby declares all matters in litigation satisfactorily settled and adjusted and dismisses the above styled cause at her costs.

Cora Hines Schalkenbach
Complainant.

Witness -

E. Craven

Notice to Non-resident

Cora Schalkenbach, Complainant
vs

Albert P. Schalkenbach and
Albert E. Schalkenbach
THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

This the 9th day of May, 1933.

In this cause it being made to appear to the Clerk of this Court by the affidavit of Cora Schalkenbach that the Defendants Albert P. Schalkenbach and Albert E. Schalkenbach are non-residents of the State of Alabama, and that the residence of Albert E. Schalkenbach is Taconic Lake, Petersburg, N. Y., and the residence of Albert P. Schalkenbach is 13411 105th Avenue, Richmond Hill, Long Island, N. Y., and further, that, in the belief of said Affiant the Defendants are over the age of 21 years; it is, therefore, ordered that publication be made in the Fairhope Courier, a newspaper published in Fairhope, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Albert P. Schalkenbach and Albert E. Schalkenbach to answer or demur to the Bill of Complaint in this cause by the 12th day of June, 1933, or after thirty days therefrom a decree Pro Confesso may be taken against them.

T. M. RICHESON,

Register.

ELLIOTT G. RICKARBY,
Solicitor for Complainant.

41-41

STATE OF ALABAMA
COUNTY OF BALDWIN

E. B. Gaston, being by me first duly sworn on oath says:
that he is the publisher of the Fairhope Courier, a newspaper
of general circulation, published weekly in the Town of Fair-

hope, in said county and State; that the attached Notice
to Non-resident

was published for 17 consecutive weeks, in each of the
regular issues of said newspaper to-wit in the issues of

May 4, May 11, May 18, and
May 25

E. B. Gaston Pub

12th
22nd

Subscribed and sworn to before me this

12th
day of January
1933

H. E. Perkins

Notary Public

NOTICE TO NON-RESIDENT.

Moore Ptg. Co—Bay Minette.

<u>Cora Schalkenbach, Complainant</u>	}	The State of Alabama,
<u>No.</u>		<u>Baldwin</u> County.
<u>vs.</u>		Circuit Court, in Equity.
<u>Albert P. Schalkenbach and</u>		
<u>Alfred E. Schalkenbach</u>		This the <u>9th</u> day of
		<u>May</u> , 192 <u>3</u>

In this cause it being made to appear to the Clerk of this Court by the affidavit of

Cora Schalkenbach

that the Defendants Albert P. Schalkenbach and Alfred E. Schalkenbach

is a non-resident of the State of Alabama ~~and that the residence of Albert P. Schalkenbach is Tacnic Lake, Petersburg, N.Y., and the residence of Alfred E. Schalkenbach is 13411 105th Avenue, Richmond Hill, Long Island,~~

and further, that, in the belief of said Affiant... the Defendants ~~are~~ over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring

the said Albert P. Schalkenbach and Alfred E. Schalkenbach

to answer or demur to the Bill of Complaint in this cause by the 12th day of June, 1923, or after thirty days therefrom a decree Pro Confesso may be taken against them

Register.

TO THE HONORABLE FRANCIS W. HARE,

JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

SITTING IN EQUITY:

Comes CORA SCHALKENBACH and by this her bill of complaint presented against ALBERT E. SCHALKENBACH and ALFRED P. SCHALKENBACH, respectfully shows:

FIRST: That she is now over the age of twenty-one years, is now and has been all her life a bona fide resident of the State of Alabama, and now resides in the Town of Fairhope in Baldwin County. That Albert E. Schalkenbach and Alfred P. Schalkenbach are both over the age of twenty-one years, the former a resident of Fairhope, Baldwin County, Alabama, at present visiting in the State of California, and the latter residing at 13411 105th Avenue Richmond Hill, Long Island, New York.

SECOND: That Complainant and Albert E. Schalkenbach were married in Chicago, Illinois, on or about the 19th day of March, 1932, and after stops in St. Louis and Mobile came together to Baldwin County on April 24th, where said Defendant has a home in the Single Tax Colony of the Town of Fairhope, in which house Complainant has since resided.

THIRD: That on or about the 19th day of May, 1932, the said Albert E. Schalkenbach, without just cause, wilfully abandoned the bed and board of Complainant and left the State of Alabama, since which time he has not returned and has made no provision for the maintenance and support of Complainant, leaving her in bad health without means of support and a charge upon the community.

FOURTH: That on or about the 23rd day of December, 1932, after Complainant had applied to her said husband for support without avail, Albert E. Schalkenbach made a conveyance of the home then owned by him in Fairhope, and being the improvements and Colony lease on Lots 11 and 12 in Block 2, Division 3 of the Town of Fairhope, to Alfred P. Schalkenbach, his son, for the purpose, as Complainant believes and so avers, of depriving her of her legal

right in said property, which she was then occupying as a home, and for the further purpose of evading any responsibility for her continued support and maintainance.

FIFTH: Complainant further avers that the transfer to the said Alfred P. Schalkenbach was made without consideration or adequate consideration and with the full knowledge of the grantee of the circumstances and reason under which said conveyance was made, and that it was an attempted fraud against Complainant's rights. That said Alfred P. Schalkenbach was put upon inquiry and charged with notice of Complainant's rights by the fact that at the time of said transfer and for a number of months prior thereto she was in actual possession and occupancy of the premises and said possession and occupancy still continues.

SIXTH: Complainant further avers that the property so conveyed was the homestead of the said Albert E. Schalkenbach and as such a conveyance of said homestead by her said husband without her consent and approval expressed in the mode provided by Alabama law was a nullity and conveyed no actual title, though the record title passed upon the transfer by the Single Tax Colony of the title to said lot made at the request of Albert E. Schalkenbach.

SEVENTH: That Complainant, as before stated, is without means of support and in bad health, being now supported by friends and charitable organizations of the County of Baldwin, that the necessity for this is an imposition upon those who are thus contributing, and that the moral and legal responsibility for her maintainance and medical attention rests upon her said husband, Albert E. Schalkenbach.

THE PREMISES CONSIDERED, Complainant prays that Albert E. Schalkenbach and Alfred P. Schalkenbach be made parties defendant to this bill and by notice served upon them by registered mail be required to answer same within the time prescribed by law and abide by such orders as may be made in the premises.

COMPLAINANT FURTHER PRAYS that an order be made forthwith commanding the Register of the Court to hold a reference to ascertain suitable and proper amounts to be allowed her out of the estate of Albert E. Schalkenbach, as alimony pendente lite and

counsel fees; that upon the finding of such reference a decree be made requiring the payment by the said Albert E. Schalkenbach of such counsel fees and temporary alimony until the final determination of this cause.

COMPLAINANT FURTHER PRAYS that upon the hearing of this cause a decree be rendered requiring the payment by said Albert E. Schalkenbach such sum each month for the support of Complainant as is consistent with her needs and his financial ability, and further decreeing that should any part of the sums thus ordered not be paid within a reasonable time to be fixed by the Court, that the property of the said Albert E. Schalkenbach in Baldwin County be attached and sold and the proceeds applied to the satisfaction of said decree, and the cost of this cause.

COMPLAINANT FURTHER PRAYS that the said Alfred P. Schalkenbach be required to show cause why the transfer made to him by Albert E. Schalkenbach of the latter's property in Baldwin County as aforesaid should not be cancelled and set aside and the record title thereto restored to the grantor, and that should he fail to do so, an order be made forever cancelling said transfer and restoring the title to Albert E. Schalkenbach as of former estate and placing same subject to the orders and jurisdiction of this Honorable Court.

COMPLAINANT FURTHER PRAYS that she may have such other, further or different relief as to equity may seem meet.

Elliott G. Rieck
Solicitor for Complainant

NOTE: The defendants are required to answer each paragraph of the foregoing bill but not under oath.

Elliott G. Rieck
Solicitor for Complainant

STATE OF ALABAMA

COUNTY OF BALDWIN

Before me, the undersigned Notary, personally appeared this day Cora E. Schalkenbach, who, being sworn, says she is the Complainant in the foregoing bill, that the defendants above named are both over the age of twenty-one years, and now non-residents of the State of Alabama, so that personal service cannot be made upon them, and that service by registered mail is necessary to bring defendants within the jurisdiction of this Court, that the present address of Albert E. Schalkenbach is Taconic Lake, Petersburg, New York, from which point mail will be forwarded to him while the address of Alfred P. Schalkenbach is 13411 105th Avenue, Richmond Hill, Long Island, New York.

Cora Schalkenbach

Subscribed and sworn to before me this the 23rd.
day of March, 1933.

G. E. Perkins

Notary Public, Baldwin County, Ala.

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 Alfred P. Schalkenbach

131411-105th Avenue, Richmond Hill New York,

of New York ~~& 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

Cora Schalkenbach

against said

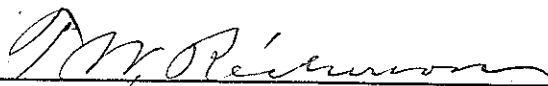
Alfred P. Schalkenbach

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

March

1933.



Register

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

SERVE ON

RECORDED

Circuit Court of Baldwin County
In Equity

No. 1103.

SUMMONS

Cora Schalkenbach

vs.

Alfred P. Schalkenbach,

E.G. Rickarby, Robertsdale Ala.
Solicitor for Complainant

Recorded in Vol. _____ Page _____

RECORDED

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____ 19____

Sheriff.

Executed this _____ day of _____

19____

by leaving a copy of the within Summons with _____

Defendant.

Sheriff.

By _____

Deputy Sheriff.

Mar 24th 1933
Copy of Bill and Copy of
Complaint Registered
At 131411-105th Ave.
Richmond Hill N.Y.
J. W. Schalkenbach
Register

all this day. I have read the within summons and the complaint and the bill and I have found that the same are in conformity with the law and the rules of the court and I have caused a copy of the same to be filed in the office of the clerk of the court and I have caused a copy of the same to be served on the defendant by the sheriff of the county of Baldwin.

To vob

RECORDED

RECORDED

CORA SCHALKENBACH,	:	
Complainant,	:	IN THE CIRCUIT COURT OF
-vs-	:	BALDWIN COUNTY, ALABAMA
ALBERT E. SCHALKENBACH and	:	IN EQUITY - No.1103 $\frac{1}{2}$
ALFRED P. SCHALKENBACH,	:	
Respondents.	:	

Comes the respondent, Albert P. Schalkenbach, and for answer on his behalf to the bill of complaint filed in this cause, says as follows:

1. This respondent admits the allegations of the first paragraph of the bill of complaint, except the allegation that Albert E. Schalkenbach is a resident of Fairhope, Baldwin County, Alabama, and is at present visiting in the State of California, which this respondent denies.

2. This respondent denies that the complainant and respondent, Albert E. Schalkenbach, were married in Chicago, Illinois, on or about the 19th day of March, 1932, and demands strict proof thereof. This respondent is not informed, and therefore neither denies nor affirms, the fact that the complainant and said Albert E. Schalkenbach came to Baldwin County on April 24, 1932. This respondent further denies that said Albert E. Schalkenbach has a house in the Single Tax Colony Town of Fairhope, but neither denies nor affirms that the complainant has resided since that time in said house.

3. This respondent further denies that on or about the 19th day of March, 1932 the respondent, Albert E. Schalkenbach, without just cause, wilfully abandoned the bed and board of the complainant. This respondent is not informed of the exact date that Albert E. Schalkenbach left the State of Alabama, and therefore neither affirms nor denies the alleged date thereof and the fact that he has not returned. This respondent neither affirms nor denies

that Albert E. Schalkenbach has made no provisions for the maintenance and support of the complainant, and that he left her in bad health, without means of support, and a charge upon the community, but this respondent does deny that there was any duty on the part of Albert E. Schalkenbach to furnish any maintenance or support for the complainant; but this respondent is informed and believes, and upon such information and belief avers, that there was no duty upon said Albert E. Schalkenbach to maintain and support the complainant.

4. This respondent does not know, and therefore neither affirms nor denies, that the complainant applied to Albert E. Schalkenbach for support before the 23rd of December 1932, but denies that said Albert E. Schalkenbach on said date made a conveyance of the house then owned by him in Fairhope, and being the improvements and colony lease on Lots 11 and 12 in Block 2, Division 3 of the Town of Fairhope, to this respondent, his son, for the purpose of depriving complainant of her legal right in said property, which she was then occupying as a home, and for the further purpose of evading any responsibility for her continued support and maintenance.

5. This respondent further denies that the transfer to him was made without consideration or adequate consideration, and that it was an attempt at fraud against complainant's rights. This respondent further denies that he was put upon inquiry or charged with notice of complainant's rights, by the fact that at the time of said transfer, and for a number of months prior thereto, complainant was in actual possession and occupancy of the premises, but does not deny that said possession and occupancy still continues.

6. This respondent further denies that the property conveyed was the homestead of the said Albert E. Schalkenbach, and denies that such a conveyance under the Alabama law was a nullity because it was made by Albert E.

Schalkenbach without complainant's consent and approval, and denies that such conveyance conveyed no actual title, but admits that the record of the title passed to this respondent upon the transfer by the Single Tax Colony of the title to said lot.

7. This respondent denies that the moral and legal responsibility for the maintenance of and medical attention to the complainant rests upon the said Albert E. Schalkenbach, and denies that said Albert E. Schalkenbach is the husband of complainant, but neither denies nor affirms the other allegations of paragraph 7.

Further answering the complaint, this respondent avers that he is informed and believes, and upon such information and belief charges, that the complainant and Albert E. Schalkenbach were never married and were never husband and wife, and that there was no duty or obligation on the part of the said Albert E. Schalkenbach to either support or maintain the complainant. This respondent further avers that on, to-wit, the 17th day of November, 1932 Albert E. Schalkenbach conveyed to this respondent all his right, title, and interest, by an instrument duly executed in the form of a lease for ninety-nine years, in and to that certain plot of land described as Lot 12, Block 2, Division 3 of the land of the Fairhope Single Tax Corporation, Fairhope, Baldwin County, Alabama, as per its plot thereof filed for record September 13, 1911, and in Fractional Section 18, Township 6 South, Range 2 East, Baldwin County, Alabama, together with the buildings and improvements thereupon erected, which property was approximately sixty-six feet (66') by one hundred and thirty-two feet (132') and located on the southwest corner of Summit and Keefer Streets, Fairhope, Baldwin County, Alabama, for the consideration of Fifteen Hundred Dollars (\$1500.00) paid to the said Albert E. Schalkenbach by this respondent, which con-

veyance was duly recorded in the Probate Office, Baldwin County, Alabama, on the 30th day of November, 1932, and recorded in Deed Book 52 N.S., pages 538-39-40. This respondent further avers that the above purchase was made by him in good faith and for a valuable consideration, as alleged above. Wherefore, complainant should not have any of the relief prayed for.

And this respondent, having fully answered,
prays to go hence with his costs in this suit.

Smith & Johnson
Solicitors for Respondent,
Albert P. Schalkenbach

MRS. CORA SCHALKENBACH,)	IN THE CIRCUIT COURT
COMPLAINANT,)	OF
-vs-)	BALDWIN COUNTY,
ALBERT E. SCHALKENBACH)	ALABAMA.
and ALBERT P. SCHALKENBACH)	IN EQUITY NO. 1103½
RESPONDENTS,)	

Come Smith & Johnston, solicitors practicing before this Court, who have heretofore filed demurrers in said cause as "solicitors for respondents;" and move the Court to allow the withdrawal of the said demurrers as originally filed in said cause, and to allow the withdrawal of any appearance, which may have been filed in said cause by them as solicitors for respondents, or any appearance of Albert E. Schalkenbach of any nature which may have been filed in this cause, and move the Court to allow them to file demurrers for and on behalf of only the respondent Albert P. Schalkenbach, on the following grounds, to-wit:

1. Because your movants were not employed by the said Albert E. Schalkenbach to represent him in the above suit at the time said demurrers were filed, and have no authority to file any appearance for said respondent.

2. Because said firm does not represent the said Albert E. Schalkenbach, and was not employed or authorized to file any demurrers on his behalf, or to file any appearance on his behalf in said cause, but that said demurrers were filed for the "respondents" through inadvertence or typographical error on the part of your movants.

3. Because said demurrers and/or appearance were filed on behalf of Albert E. Schalkenbach through inadvertence or mistake.

In support of this motion, an affidavit is

filed herewith substantiating the grounds above stated.

Wherefore it is prayed that this Honorable Court will grant your movants the right to withdraw any demurrers or any appearance, which they may have filed on behalf of the said Albert E. Schalkenbach, and strike said demurrers or any appearance, if there be any, on behalf of the said Albert E. Schalkenbach from the records in this cause, and will grant the withdrawal of any demurrers filed by the said Albert E. Schalkenbach, and will grant the withdrawal of any appearance of any nature made or filed by the said Albert E. Schalkenbach in this cause, and will strike any appearance of the said Albert E. Schalkenbach from the records in this cause, and will treat and limit any appearance which may have been filed heretofore in this case by the movants for the "respondents" to apply only to the respondent Albert P. Schalkenbach, whom the undersigned solicitors represent in this cause.

Smith & Johnston

MRS. CORA SCHALKENBACH,)	IN THE CIRCUIT COURT
COMPLAINANT,)	OF
-vs-)	BALDWIN COUNTY,
ALBERT E. SCHALKENBACH and)	ALABAMA.
ALBERT P. SCHALKENBACH,)	IN EQUITY NO. 1103 $\frac{1}{2}$
RESPONDENTS,)	

Comes the respondent, Albert P. Schalkenbach, and demurs to the bill of complaint in the above styled cause, the original demurrers having been withdrawn, and as grounds for said demurrers sets down and assigns the following separate and several grounds, to-wit:

1. Because said bill of complaint contains no equity.

2. For aught appearing from said bill of complaint the complainant and the respondent, Albert E. Schalkenbach, were never lawfully married.

3. Because said bill of complaint does not allege sufficient facts to show that the respondent, Albert E. Schalkenbach owed the complainant any duty to support and maintain her.

4. For aught appearing from said bill of complaint the complainant and respondent, Albert E. Schalkenbach, never assumed the obligation or duties of the relationship of man and wife.

Smith & Johnston
Solicitors for Respondent,
Albert P. Schalkenbach

MRS. CORA SCHALKENBACH, : IN THE CIRCUIT COURT
COMPLAINANT, : OF
-vs- : BALDWIN COUNTY,
ALBERT E. SCHALKENBACH and : ALABAMA.
ALBERT P. SCHALKENBACH, :
RESPONDENTS, : IN EQUITY NO. 1103 $\frac{1}{2}$

STATE OF ALABAMA,)
COUNTY OF MOBILE,)

Before me, the undersigned authority, personally appeared P. C. Fountain, who upon being first duly sworn, deposes and says, that, he is the attorney who filed the demurrers in the above styled cause for the firm of Smith and Johnston, as solicitors for the "respondents" and that he did not intend to file any demurrers in said cause or any appearance of any kind in said cause for or on behalf of Albert E. Schalkenbach, but that it was through inadvertence or a typographical error that the demurrers appear to be filed for the "respondents." That he discovered said fact on August 21st, 1933, while in Bay Minette, Alabama, for settlement of pleadings before this Court. That neither he nor the firm of Smith and Johnston are employed by the respondent Albert E. Schalkenbach, but only are employed by the respondent Albert P. Schalkenbach, and none other, and that said demurrers, and/or appearance, if any, was not willfully filed on behalf of both of the respondents, but that the same was done through inadvertence or mistake or typographical error, whereas said demurrers and/or appearance should have been limited as being filed on behalf of the respondent Albert P. Schalkenbach.

That the motion to strike from the records in this cause the demurrers heretofore filed and any appearance which may be filed in said cause, in so far

as the same affects, or appears to be for the respondent, Albert E. Schalkenbach, ~~is not filed to prejudice either party in right to this suit, but solely~~ is filed for the purpose of clearing up an inadvertent mistake, innocently done, and to avoid any prejudice of, or jeopardy to, the rights of Albert E. Schalkenbach, whom the affiant nor the firm of Smith and Johnston, does not represent in this cause, and did not represent at the time said demurrers and/or any appearance herein were filed.

P. L. Fountain

Sworn to and subscribed before me this 22nd
day of August, 1933.

Louis Barr
Notary Public, Mobile County,
Alabama.

CORA SCHALKENBACH, :
Complainant, : IN THE CIRCUIT COURT OF
-vs- : BALDWIN COUNTY, ALABAMA
ALBERT E. SCHALKENBACH and : IN EQUITY - No. 1103 $\frac{1}{2}$
ALFRED P. SCHALKENBACH, :
Respondents. :
:

INTERROGATORIES PROPOUNDED TO THE COMPLAINANT BY THE RESPONDENT,
ALBERT P. SCHALKENBACH:

1. Please state when you first met Albert E. Schalkenbach and where.
2. (a) Where do you claim you were married to the respondent, Albert E. Schalkenbach, and on what date?
(b) If you have answered that you married the respondent, Albert E. Schalkenbach, in Chicago, Illinois, please state whether or not any marriage license was issued to you or to Albert E. Schalkenbach for your marriage to him in Chicago, Illinois. (c) If you have answered that there was a marriage license issued, please state the name of the judge issuing said license and the date of its issuance.
3. If you have answered that you married Albert E. Schalkenbach in Chicago, Illinois in March 1932, please state the name of the official who officiated at said ceremony, if there was any ceremony, and where the marriage took place.
- 4.(a) Is it not a fact that you and the respondent, Albert E. Schalkenbach, were never married by any ceremony performed by any priest, minister, or official of any kind?
(b) Is it not a fact that no marriage license was ever issued for your marriage to the respondent, Albert E. Schalkenbach?
5. (a) When is the last time you saw the said Albert E. Schalkenbach? (b) Is there any furniture, household goods, utensils, clothing, or any other personal property in the house in Fairhope which you are now occupying? (c) If so, please state if it is the same furniture, household goods,

or property which was in said house in November 1932. (d) If you have answered that there is such property in said house, please state to whom the same belongs.

6. Are you now occupying the house and lot known as Lot 12, Block 2, Division 3 of the land of the Fairhope Single Tax Corporation, Fairhope, Alabama?

7. Did you and the respondent, Albert E. Schalkenbach, leave Chicago, Illinois together on the 19th of March, 1932? If so, where did you go from there?

8. If you have answered that you came to St. Louis from Chicago, please state how long you stayed in St. Louis and where you stopped there.

9. (a) If you have answered that you came to St. Louis, please state where you went from St. Louis and how long you stayed in the next place you stopped at. (b) Please state the various places you stopped at between Chicago, Illinois and Baldwin County, Alabama, and where you stayed at each place and the length of time you stayed at each place.

10. Please state the date you arrived in Baldwin County.

11. (a) Did you and the respondent, Albert E. Schalkenbach, go about the Town of Fairhope, Alabama together after you came there? (b) If so, please state how often and to what places in the Town of Fairhope you went together.

12. (a) Did you and the respondent, Albert E. Schalkenbach, visit or pay social calls on any neighbors or residents of Fairhope, Alabama in April or May 1932, together? (b) If so, please state whom you so visited, and the frequency of such visits or calls.

13. Please state from whom you purchased groceries or supplies for yourself in the Town of Fairhope in April or May 1932.

Smith & Johnston
Attorneys for Respondent,
Albert E. Schalkenbach

STATE OF ALABAMA,)
COUNTY OF MOBILE.)

Before me, the undersigned authority in and for said County and State, personally appeared P. C. Fountain, who, being by me duly sworn, on oath deposes and says that he is one of the attorneys for Albert P. Schalkenbach in the above entitled cause, and that the answers to the foregoing interrogatories, if well and truthfully made, will be material evidence for said respondent in said cause.

P. C. Fountain

Subscribed and sworn to before me
this 26th day of December, 1934.

Genevieve G. Greenwood
Notary Public, Mobile County, Alabama

CORA SCHALKENBACH, et al
Complainant

vs

ALBERT E. SCHALKENBACH, et al
Respondents

E Q U I T Y

IN CIRCUIT COURT OF
BALDWIN COUNTY, ALA.

Comes, ELLIOTT G. RICKARBY, and withdraws the appearance heretofore filed by him as Solicitor for the Complainant.

Elliott G. Rickarby

RECORDED

1103

quality

CORA SCHALKENBACH

VS

ALBERT E. SCHALKENBACH,
et al

WITHDRAWAL OF APPEARANCE,

*Filed July 25-1934
By A. E. Shaw
Black.*

CORA SHALKENBACH

Complainant

VS

ALBERT E. SCHALKENBACH AND

ALFRED P. SCHALKENBACH

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

TO CORA SHALKENBACH, COMPLAINANT AND CROSS RESPONDENT:-

You are hereby notified that on the 8th day of August, 1935, Interrogatories were propounded by the Respondent Albert P. Schalkenbach to Albert P. Schalkenbach, a material witness on behalf of the Respondent, who resides at 134-11 105th Avenue, Richmond Hill, Queens County, New York, and that Mr. Daniel F. Kelley, 280 Madison Avenue, New York City, is suggested as a suitable person to take the answers to the said interrogatories.

You are allowed ten days from the date of the service of this notice in which to cross the said interrogatories if you so desire, or at the end of that time the original Interrogatories will be mailed to the said Mr. Daniel F. Kelley, 280 Madison Avenue, New York City,

Witness my hand this the 8th day of August, 1935.

Robert L. Luck
Register of the Circuit Court of
Baldwin County, Alabama,

RECORDED

Desk

Executed this 14th
day of August 1935
by leaving a copy
of the within notice
with
Cora Shalckenback

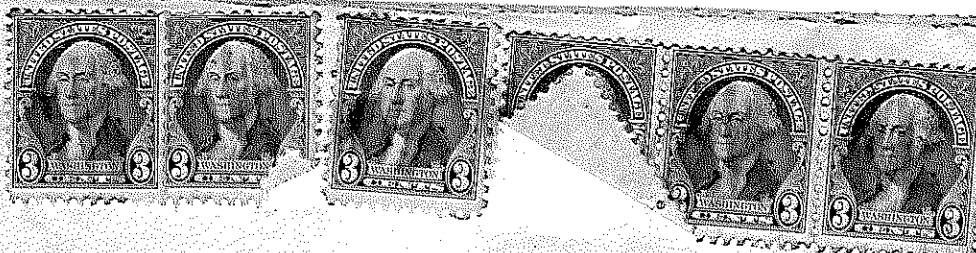
Corn

M. W. Wilkins
Sheriff

RECORDED

Desk

After five days return to
T. W. RICHERRSON
Register and Clerk of the Circuit Court
Baldwin County
BAY MINETTE, ALA.



RETURN TO WRITER
REASON FOR NON-DELIVERY CIRCLED
Undelivered.....Unknown.....
Decayed.....For better address.....
Moved, left no address.....Refused.....
No such post office in state named.....

750

Deliver to addressee only.

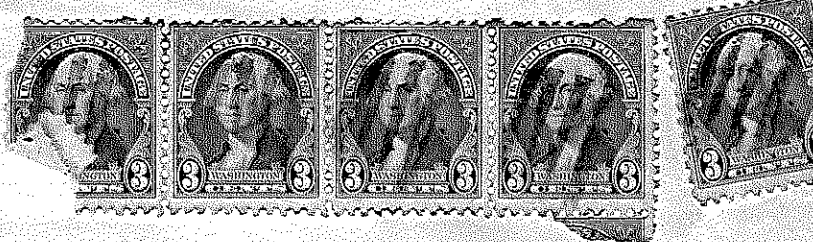
(Deliver to addressee only) **Albert E. Schalkenbach**
(Return receipt requested) **Taconic Lake**
Petersburg
New York.

Return Receipt Requested
Fee Paid

9924-21248
Quinnville
N.Y.

RETURN TO WRITER
REASON FOR NON-DELIVERY CIRCLED
Undelivered.....Unknown.....
Decayed.....For better address.....
Moved, left no address.....Refused.....
No such post office in state named.....

After five days return to
T. W. RICHERRSON
Register and Clerk of the Circuit Court
Baldwin County
BAY MINETTE, ALA.



REGISTERED
749

Deliver to addressee only.

Return Receipt Requested
Fee Paid

(Deliver to addressee only) **Alfred P. Schalkenbach**
(Return Receipt requested) **13411 - 105th Avenue**
Richmond Hill Long
Island New York.

UNCLAIMED

RECEIVED ARTICLE NO. 749 *Papers*
15 fee paid. postage paid 3-24-1933
From *T. W. Richerson* (Sender)
Addressed to *Alfred P. Schalkenbach* (Post office and State)
13411 - 105th Avenue (Street and number)
Accepting employee will place initials in space below indicating restricted delivery.
Return receipt fee 3 *Island New York* (Post office and State)
Delivery restricted to addressee in person. special delivery fee
or order. Postmaster, per 2

RECEIPT FOR REGISTERED ARTICLE NO. 750 *Papers*
15 fee paid. 1 class postage paid. 3-24-1933
From *T. W. Richerson* (Sender)
Addressed to *Albert E. Schalkenbach* (Post office and State)
Taconic Lake Petersburg (Street and number)
Accepting employee will place initials in space below indicating restricted delivery.
Return receipt fee 3 *New York* (Post office and State)
Delivery restricted to addressee in person. ☒ Postmaster, per
or order

CORA SCHALKENBACH, :

Complainant, : IN THE CIRCUIT COURT OF

-vs- : BALDWIN COUNTY, ALABAMA

ALBERT E. SCHALKENBACH and : IN EQUITY - No. 1103

ALFRED P. SCHALKENBACH, :

Respondents. :

COMES the respondent, Albert P. Schalkenbach, and amends his answer heretofore filed to the bill of complaint in the above entitled cause, as follows:

By striking therefrom the last paragraph of said answer, which reads as follows:

"And this respondent, having fully answered, prays to go hence with his costs in this suit."

and adding in lieu thereof the following:

And this respondent further avers that on, to-wit, the 17th day of November, 1932, Albert E. Schalkenbach conveyed to this respondent the following personal property situated in the house above referred to, which personal property is as follows:

- 4 Ceiling Electric lights, fixtures complete
- 2 - 9x12 Floor rugs
- Reed Parlor suit upholstered - settee, library table, arm chair, rocker
- 1 Clock with chimes, Seth Thomas
- 2 Bronze figures used as light fixtures
- 2 Pictures of Ancient Rome
- 2 Small Pictures
- Heavy Oak Dining Table; side board and china closet; heatrola oil burner, Oak Morris Chair upholstered, oak arm chair and rocker to match, 4 Oak dining chairs, mahogany library table, radio, 1 dinner set complete, 1 Tea set, Japanese and numerous miscellaneous dishes.
- 1 Enamel bed, spring mattress, 1 new simmons mattress, sheets, blankets,
- 2 Feather beds; large quantity of linens, towels, etc.
- 1 Bed room rug 9x12
- 1 Oak dresser, 2 chairs, trunk - both trunk and dresser filled with linens of all kinds.
- 1 Enamel bed, spring mattress, hair and cotton mattress, bed room rug 6x9, maple dresser, oak chifferobe, 2 overcoats, 2 suits clothing, blankets, pillows and miscellaneous items of clothing.
- Kitchen cabinet, oil stove, table, enamel top, Ice box, kitchen dishes, pots and pans and kitchen utensils of various kinds, etc., etc.,

for the consideration of One Hundred Dollars (\$100.00) paid

to the said Albert E. Schalkenbach by this respondent.
This respondent further avers that the above purchase was made by him in good faith and for valuable consideration, as alleged.

WHEREFORE, the premises considered, this respondent, Albert P. Schalkenbach, prays that this answer be treated as a cross bill; that the complainant, Cora Schalkenbach, be made party respondent thereto; and that due process be issued to her and served upon her, and that she be required to answer said cross bill, as required by law.

This respondent and cross complainant further prays that this Court enter a decree that this respondent is entitled to the possession of all of the above described and referred to property, both as to the house and lot and as to the personal property, and cross complainant further prays that the Court decree that the said Cora Schalkenbach, complainant, has no interest whatsoever in said property and that she immediately surrender any possession she may have or claim to have to your cross complainant, and that this Court ascertain and decree that the complainant, and cross respondent, has been unlawfully withholding said property and premises from this respondent and cross complainant, and fix the amount of damages which cross complainant is entitled to for the detention of said property and premises, and cross complainant prays for such other, further, and additional relief as he may, in equity and good conscience, be entitled to.

Smith & Johnston
Solicitors for Respondent and
Cross Complainant, Albert P.
Schalkenbach

FOOT NOTE: Cross respondent, Cora Schalkenbach, is required to answer each and every allegation of the above and foregoing cross bill, but not under oath, answer under oath being hereby expressly waived.

Smith & Johnston
Solicitors for Respondent and
Cross Complainant, Albert P.
Schalkenbach

CORA SCHALKENBACH

Complainant.

VS

ALBERT E. SCHALKENBACH, et al

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

Comes the Complainant and shows to the
Register that both Defendants are non-residents of the State
and moves for an order of publication against them.

Ernest B. Ristaby

Solicitor for Complainant.

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned Notary, personally appeared this day CORA SCHALKENBACH who, being known to me, says that she is the Complainant in a certain cause heretofore filed by her in the Circuit Court of Baldwin County, in Equity, wherein Albert E. Schalkenbach and Albert P. Schalkenbach are parties defendant, that said Defendants are both over the age of twenty one years and at present non-residents of the State of Alabama so that personal service can not be had upon them; that their last known addresses are, for Albert E. Schalkenbach, Taconic Lake, Petersburg, N. Y., and for Albert P. Schalkenbach 13411 105th Avenue, Richmond Hill, Long Island, so that publication is necessary to obtain service upon said defendants in this cause.

Cora Schalkenbach

Subscribed and sworn to before me this the 6th day of May, 1933.

Bernice S. Tolman

Notary Public, Baldwin County,

Alabama.

1103 #

CORA SCHALKENBACH,
Complainant.

vs

ALBERT E. SCHALKENBACH, et al
Defendants.

MOTION FOR ORDER OF PUBLI*
CATION.

Filed May 9, 1933

*J. M. Rickerson
Register*

ELLIOTT G. RICKARBY,
Solicitor for Complainant.

*Do not
pay
this
33*

*Do not
pay
this
33*

RECEIVED
MAY 10 1933
COURT CLERK

The State of Alabama, { Circuit Court of Baldwin County, In Equity
Baldwin County

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Cora Shalkenbach,

Complainant and Cross respondent

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 Sum-
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by
Albert E. Schalkenbach, and Alfred P. Schalkenbach,

against said Cora Shalkenbach, Complainant and Cross -Respondent.

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, Robert S. Duck, Register of said Circuit Court, this 8th day

of August 193 5

Robert S. Duck

Register

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

Original
RECORDED
10946

Serve on _____
Circuit Court of Baldwin County
IN EQUITY

No. 1183 1/2

SUMMONS

Schalckenbach

vs.

Schalckenbach

Solicitor for Complainant

144
THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this
RECORDED

day of Aug, 1933

M. H. Wilkins

SHERIFF

Executed this 14 day of

August 1933

by leaving a copy of the within Summons with

Cora Schalckenbach

Complainant

Defendant

M. H. Wilkins

Sheriff

By _____
Deputy Sheriff

LAW OFFICES
ELLIOTT G. RICKARBY
BANK BUILDING
FAIRHOPE, ALABAMA

April 6, 1933.

Mr. Thos. W. Richerson,
Clerk of Circuit Court,
Bay Minette, Ala.

Dear Sir:

SCHALKENBACH vs. SCHALKENBACH: I
have just learned^{both} that the first names of the parties
Defendant is Albert and will therefore ask you to
change in the bill and in the copies the name
Alfred wherever it occurs to read Albert. I
will also send up in a few days an affidavit
for publication.

Very truly yours,

R:N
1013

Elliott G. Rickarby

CORA SCHALKENBACH,	:	
	:	
Complainant,	:	IN THE CIRCUIT COURT OF
-vs-	:	BALDWIN COUNTY, ALABAMA
ALBERT E. SCHALKENBACH and	:	IN EQUITY - No. 1103 $\frac{1}{2}$
ALFRED P. SCHALKENBACH,	:	
	:	
Respondents.	:	

Comes the respondent, Albert P. Schalkenbach, and for answer on his behalf to the bill of complaint filed in this cause, says as follows:

1. This respondent admits the allegations of the first paragraph of the bill of complaint, except the allegation that Albert E. Schalkenbach is a resident of Fairhope, Baldwin County, Alabama, and is at present visiting in the State of California, which this respondent denies.

2. This respondent denies that the complainant and respondent, Albert E. Schalkenbach, were married in Chicago, Illinois, on or about the 19th day of March, 1932, and demands strict proof thereof. This respondent is not informed, and therefore neither denies nor affirms, the fact that the complainant and said Albert E. Schalkenbach came to Baldwin County on April 24, 1932. This respondent further denies that said Albert E. Schalkenbach has a house in the Single Tax Colony Town of Fairhope, but neither denies nor affirms that the complainant has resided since that time in said house.

3. This respondent further denies that on or about the 19th day of March, 1932 the respondent, Albert E. Schalkenbach, without just cause, wilfully abandoned the bed and board of the complainant. This respondent is not informed of the exact date that Albert E. Schalkenbach left the State of Alabama, and therefore neither affirms nor denies the alleged date thereof and the fact that he has not returned. This respondent neither affirms nor denies

that Albert E. Schalkenbach has made no provisions for the maintenance and support of the complainant, and that he left her in bad health, without means of support, and a charge upon the community, but this respondent does deny that there was any duty on the part of Albert E. Schalkenbach to furnish any maintenance or support for the complainant; but this respondent is informed and believes, and upon such information and belief avers, that there was no duty upon said Albert E. Schalkenbach to maintain and support the complainant.

4. This respondent does not know, and therefore neither affirms nor denies, that the complainant applied to Albert E. Schalkenbach for support before the 23rd of December 1932, but denies that said Albert E. Schalkenbach on said date made a conveyance of the house then owned by him in Fairhope, and being the improvements and colony lease on Lots 11 and 12 in Block 2, Division 3 of the Town of Fairhope, to this respondent, his son, for the purpose of depriving complainant of her legal right in said property, which she was then occupying as a home, and for the further purpose of evading any responsibility for her continued support and maintenance.

5. This respondent further denies that the transfer to him was made without consideration or adequate consideration, and that it was an attempt at fraud against complainant's rights. This respondent further denies that he was put upon inquiry or charged with notice of complainant's rights, by the fact that at the time of said transfer, and for a number of months prior thereto, complainant was in actual possession and occupancy of the premises, but does not deny that said possession and occupancy still continues.

6. This respondent further denies that the property conveyed was the homestead of the said Albert E. Schalkenbach, and denies that such a conveyance under the Alabama law was a nullity because it was made by Albert E.

Schalkenbach without complainant's consent and approval, and denies that such conveyance conveyed no actual title, but admits that the record of the title passed to this respondent upon the transfer by the Single Tax Colony of the title to said lot.

7. This respondent denies that the moral and legal responsibility for the maintenance of and medical attention to the complainant rests upon the said Albert E. Schalkenbach, and denies that said Albert E. Schalkenbach is the husband of complainant, but neither denies nor affirms the other allegations of paragraph 7.

Further answering the complaint, this respondent avers that he is informed and believes, and upon such information and belief charges, that the complainant and Albert E. Schalkenbach were never married and were never husband and wife, and that there was no duty or obligation on the part of the said Albert E. Schalkenbach to either support or maintain the complainant. This respondent further avers that on, to-wit, the 17th day of November, 1932 Albert E. Schalkenbach conveyed to this respondent all his right, title, and interest, by an instrument duly executed in the form of a lease for ninety-nine years, in and to that certain plot of land described as Lot 12, Block 2, Division 3 of the land of the Fairhope Single Tax Corporation, Fairhope, Baldwin County, Alabama, as per its plot thereof filed for record September 13, 1911, and in Fractional Section 18, Township 6 South, Range 2 East, Baldwin County, Alabama, together with the buildings and improvements thereupon erected, which property was approximately sixty-six feet (66') by one hundred and thirty-two feet (132') and located on the southwest corner of Summit and Keefer Streets, Fairhope, Baldwin County, Alabama, for the consideration of Fifteen Hundred Dollars (\$1500.00) paid to the said Albert E. Schalkenbach by this respondent, which con-

veyance was duly recorded in the Probate Office, Baldwin County, Alabama, on the 30th day of November, 1932, and recorded in Deed Book 52 W.S., pages 538-39-40. This respondent further avers that the above purchase was made by him in good faith and for a valuable consideration, as alleged above. Wherefore, complainant should not have any of the relief prayed for.

And this respondent, having fully answered,
prays to go hence with his costs in this suit.

Smith & Johnston
Solicitors for Respondent,
Albert P. Schalkenbach

copy

Oct. 29 1934
Stone

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Frank J. Smith
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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 Albert E. Schalkenbach is
Taconic Lake, Petersburg, New York

of New York 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 Sum-
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by
Cora Schalkenbach

against said

Albert E. Schalkenbach,

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

March, 193 3

T. W. Richerson Register

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

Copy

SERVE ON _____
Circuit Court of Baldwin County
In Equity

No. 1103

SUMMONS

Cora Schalkenbach

vs.

Albert Schalkenbach,

I. G. Rickard, Robert Dale, et al.
Solicitor for Complainant

Recorded in Vol _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____
day of _____ 19____

Sheriff.

Executed this _____ day of _____
19____
by leaving a copy of the within Summons with

Defendant.

Sheriff.

By _____
Deputy Sheriff.

TO THE HONORABLE FRANCIS W. HARE,

JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

SITTING IN EQUITY:

Comes CORA SCHALKENBACH and by this her bill of complaint presented against ALBERT E. SCHALKENBACH and ALFRED P. SCHALKENBACH, respectfully shows:

FIRST: That she is now over the age of twenty-one years, is now and has been all her life a bona fide resident of the State of Alabama, and now resides in the Town of Fairhope in Baldwin County. That Albert E. Schalkenbach and Alfred P. Schalkenbach are both over the age of twenty-one years, the former a resident of Fairhope, Baldwin County, Alabama, at present visiting in the State of California, and the latter residing at 13411 105th Avenue Richmond Hill, Long Island, New York.

SECOND: That Complainant and Albert E. Schalkenbach were married in Chicago, Illinois, on or about the 19th day of March, 1932, and after stops in St. Louis and Mobile came together to Baldwin County on April 24th, where said Defendant has a home in the Single Tax Colony of the Town of Fairhope, in which house Complainant has since resided.

THIRD: That on or about the 19th day of May, 1932, the said Albert E. Schalkenbach, without just cause, wilfully abandoned the bed and board of Complainant and left the State of Alabama, since which time he has not returned and has made no provision for the maintenance and support of Complainant, leaving her in bad health without means of support and a charge upon the community.

FOURTH: That on or about the 23rd day of December, 1932, after Complainant had applied to her said husband for support without avail, Albert E. Schalkenbach made a conveyance of the home then owned by him in Fairhope, and being the improvements and Colony lease on Lots 11 and 12 in Block 2, Division 3 of the Town of Fairhope, to Alfred P. Schalkenbach, his son, for the purpose, as Complainant believes and so avers, of depriving her of her legal

right in said property, which she was then occupying as a home, and for the further purpose of evading any responsibility for her continued support and maintainance.

FIFTH: Complainant further avers that the transfer to the said Alfred P. Schalkenbach was made without consideration or adequate consideration and with the full knowledge of the grantee of the circumstances and reason under which said conveyance was made, and that it was an attempted fraud against Complainant's rights. That said Alfred P. Schalkenbach was put upon inquiry and charged with notice of Complainant's rights by the fact that at the time of said transfer and for a number of months prior thereto she was in actual possession and occupancy of the premises and said possession and occupancy still continues.

SIXTH: Complainant further avers that the property so conveyed was the homestead of the said Albert E. Schalkenbach and as such a conveyance of said homestead by her said husband without her consent and approval expressed in the mode provided by Alabama law was a nullity and conveyed no actual title, though the record title passed upon the transfer by the Single Tax Colony of the title to said lot made at the request of Albert E. Schalkenbach.

SEVENTH: That Complainant, as before stated, is without means of support and in bad health, being now supported by friends and charitable organizations of the County of Baldwin, that the necessity for this is an imposition upon those who are thus contributing, and that the moral and legal responsibility for her maintainance and medical attention rests upon her said husband, Albert E. Schalkenbach.

THE PREMISES CONSIDERED, Complainant prays that Albert E. Schalkenbach and Alfred P. Schalkenbach be made parties defendant to this bill and by notice served upon them by registered mail be required to answer same within the time prescribed by law and abide by such orders as may be made in the premises.

COMPLAINANT FURTHER PRAYS that an order be made forthwith commanding the Register of the Court to hold a reference to ascertain suitable and proper amounts to be allowed her out of the estate of Albert E. Schalkenbach, as alimony pendente lite and

counsel fees; that upon the finding of such reference a decree be made requiring the payment by the said Albert E. Schalkenbach of such counsel fees and temporary alimony until the final determination of this cause.

COMPLAINANT FURTHER PRAYS that upon the hearing of this cause a decree be rendered requiring the payment by said Albert E. Schalkenbach such sum each month for the support of Complainant as is consistent with her needs and his financial ability, and further decreeing that should any part of the sums thus ordered not be paid within a reasonable time to be fixed by the Court, that the property of the said Albert E. Schalkenbach in Baldwin County be attached and sold and the proceeds applied to the satisfaction of said decree, and the cost of this cause.

COMPLAINANT FURTHER PRAYS that the said Alfred P. Schalkenbach be required to show cause why the transfer made to him by Albert E. Schalkenbach of the latter's property in Baldwin County as aforesaid should not be cancelled and set aside and the record title thereto restored to the grantor, and that should he fail to do so, an order be made forever cancelling said transfer and restoring the title to Albert E. Schalkenbach as of former estate and placing same subject to the orders and jurisdiction of this Honorable Court.

COMPLAINANT FURTHER PRAYS that she may have such other, further or different relief as to equity may seem meet.

ELLIOTT G. RICKARBY.

Solicitor for Complainant

NOTE: The defendants are required to answer each paragraph of the foregoing bill but not under oath.

ELLIOTT G. RICKARBY.

Solicitor for Complainant

STATE OF ALABAMA

COUNTY OF BALDWIN

Before me, the undersigned Notary, personally appeared this day Cora E. Schalkenbach, who, being sworn, says she is the Complainant in the foregoing bill, that the defendants above named are both over the age of twenty-one years, and now non-residents of the State of Alabama, so that personal service cannot be made upon them, and that service by registered mail is necessary to bring defendants within the jurisdiction of this Court, that the present address of Albert E. Schalkenbach is Taconic Lake, Petersburg, New York, from which point mail will be forwarded to him while the address of Alfred P. Schalkenbach is 13411 105th Avenue, Richmond Hill, Long Island, New York.

CORA SCHALKENBACH.

Subscribed and sworn to before me this the 23rd day of March, 1933.

G. D. PERKINS.

Notary Public, Baldwin County, Ala.

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[Faint handwritten notes at bottom right]

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CONTINENTAL
COSTA

[illegible]

COMMITTEE OF BATHING
STATE OF ALABAMA

Copy

Spied Mar 24/933

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 Alfred P. Schelkenbach

131411-105th Avenue, Richmond Hill New York,

of New York

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

Cora Schelkenbach

against said

Alfred P. Schelkenbach

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

March 1933.

T. W. Richerson Register

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

Circuit Court of Baldwin County
In Equity

No. 1102.

SUMMONS

Wolfgang Schaikowbach

vs.

Alfred F. Schalkenbach.

Defendant.

Sheriff.

By

Deputy Sheriff.

E. C. Rickerby, Robertsdale Ala.

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this

day of _____ 19__

Sheriff.

Executed this _____ day of _____

19-

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By

Deputy Sheriff.

TO THE HONORABLE FRANCIS W. HARE,

JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

SITTING IN EQUITY:

Comes CORA SCHALKENBACH and by this her bill of complaint presented against ALBERT E. SCHALKENBACH and ALFRED P. SCHALKENBACH, respectfully shows:

FIRST: That she is now over the age of twenty-one years, is now and has been all her life a bona fide resident of the State of Alabama, and now resides in the Town of Fairhope in Baldwin County. That Albert E. Schalkenbach and Alfred P. Schalkenbach are both over the age of twenty-one years, the former a resident of Fairhope, Baldwin County, Alabama, at present visiting in the State of California, and the latter residing at 13411 105th Avenue Richmond Hill, Long Island, New York.

SECOND: That Complainant and Albert E. Schalkenbach were married in Chicago, Illinois, on or about the 19th day of March, 1932, and after stops in St. Louis and Mobile came together to Baldwin County on April 24th, where said Defendant has a home in the Single Tax Colony of the Town of Fairhope, in which house Complainant has since resided.

THIRD: That on or about the 19th day of May, 1932, the said Albert E. Schalkenbach, without just cause, wilfully abandoned the bed and board of Complainant and left the State of Alabama, since which time he has not returned and has made no provision for the maintenance and support of Complainant, leaving her in bad health without means of support and a charge upon the community.

FOURTH: That on or about the 23rd day of December, 1932, after Complainant had applied to her said husband for support without avail, Albert E. Schalkenbach made a conveyance of the home then owned by him in Fairhope, and being the improvements and Colony lease on Lots 11 and 12 in Block 2, Division 3 of the Town of Fairhope, to Alfred P. Schalkenbach, his son, for the purpose, as Complainant believes and so avers, of depriving her of her legal

right in said property, which she was then occupying as a home, and for the further purpose of evading any responsibility for her continued support and maintenance.

FIFTH: Complainant further avers that the transfer to the said Alfred P. Schalkenbach was made without consideration or adequate consideration and with the full knowledge of the grantee of the circumstances and reason under which said conveyance was made, and that it was an attempted fraud against Complainant's rights. That said Alfred P. Schalkenbach was put upon inquiry and charged with notice of Complainant's rights by the fact that at the time of said transfer and for a number of months prior thereto she was in actual possession and occupancy of the premises and said possession and occupancy still continues.

SIXTH: Complainant further avers that the property so conveyed was the homestead of the said Albert E. Schalkenbach and as such a conveyance of said homestead by her said husband without her consent and approval expressed in the mode provided by Alabama law was a nullity and conveyed no actual title, though the record title passed upon the transfer by the Single Tax Colony of the title to said lot made at the request of Albert E. Schalkenbach.

SEVENTH: That Complainant, as before stated, is without means of support and in bad health, being now supported by friends and charitable organizations of the County of Baldwin, that the necessity for this is an imposition upon those who are thus contributing, and that the moral and legal responsibility for her maintenance and medical attention rests upon her said husband, Albert E. Schalkenbach.

THE PREMISES CONSIDERED, Complainant prays that Albert E. Schalkenbach and Alfred P. Schalkenbach be made parties defendant to this bill and by notice served upon them by registered mail be required to answer same within the time prescribed by law and abide by such orders as may be made in the premises.

COMPLAINANT FURTHER PRAYS that an order be made forthwith commanding the Register of the Court to hold a reference to ascertain suitable and proper amounts to be allowed her out of the estate of Albert E. Schalkenbach, as alimony pendente lite and

counsel fees; that upon the finding of such reference a decree be made requiring the payment by the said Albert E. Schalkenbach of such counsel fees and temporary alimony until the final determination of this cause.

COMPLAINANT FURTHER PRAYS that upon the hearing of this cause a decree be rendered requiring the payment by said Albert E. Schalkenbach such sum each month for the support of Complainant as is consistent with her needs and his financial ability, and further decreeing that should any part of the sums thus ordered not be paid within a reasonable time to be fixed by the Court, that the property of the said Albert E. Schalkenbach in Baldwin County be attached and sold and the proceeds applied to the satisfaction of said decree, and the cost of this cause.

COMPLAINANT FURTHER PRAYS that the said Alfred P. Schalkenbach be required to show cause why the transfer made to him by Albert E. Schalkenbach of the latter's property in Baldwin County as aforesaid should not be cancelled and set aside and the record title thereto restored to the grantor, and that should he fail to do so, an order be made forever cancelling said transfer and restoring the title to Albert E. Schalkenbach as of former estate and placing same subject to the orders and jurisdiction of this Honorable Court.

COMPLAINANT FURTHER PRAYS that she may have such other, further or different relief as to equity may seem meet.

ELLIOTT G. RICKARBY,

Solicitor for Complainant

NOTE: The defendants are required to answer each paragraph of the foregoing bill but not under oath.

ELLIOTT G. RICKARBY.

Solicitor for Complainant

W. H. Perkins
- 4 -
STATE OF ALABAMA
COUNTY OF BALDWIN

Before me, the undersigned Notary, personally appeared this day Cora E. Schalkenbach, who, being sworn, says she is the Complainant in the foregoing bill, that the defendants above named are both over the age of twenty-one years, and now non-residents of the State of Alabama, so that personal service cannot be made upon them, and that service by registered mail is necessary to bring defendants within the jurisdiction of this Court, that the present address of Albert E. Schalkenbach is Taconic Lake, Petersburg, New York, from which point mail will be forwarded to him while the address of Alfred P. Schalkenbach is 13411 105th Avenue, Richmond Hill, Long Island, New York.

CORA SCHALKENBACH.

Subscribed and sworn to before me this the 23rd day of March, 1933.

G. H. PERKINS.

Notary Public, Baldwin County, Ala.

NOTARY PUBLIC, BELMONT COUNTY, N.Y.

GIVEN UNDER MY HAND AND SEAL OF OFFICE.

25th of March, 1893. Subscribed and sworn to before me this 25th day

JOSEPH SCHWENKBECH.

Hill, Rock Island, New York.
Squires of Alfred B. Schwenkbech is 1241 102th Avenue, Brooklyn
New York, from which point will will be forwarded to him this the
present Squires of Alfred B. Schwenkbech is located here, Belvedere,
to which residence within the jurisdiction of this Court, that the
he have from then and that service be returned with the necessary
residence of the State of New York, so that because service cannot
be made are both over the age of twenty-one years, and now now
is the complaint in the foregoing bill, that the defendant does
suffer this day Court B. Schwenkbech, who being sworn, says and
before me, the undersigned Notary, Belvedere

COMMISSIONER OF THE
STATE OF ALABAMA

Filed Mar 24/1933
T.W. Rimmer
Register

VIRGINIA E. HOLMES AND
P. E. HOLMES, JR.,

Complainants,

VS.

FARMERS SUPPLY COMPANY, INC.,

Respondent.,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. ____.

DEMURRERS.

Comes the Respondent in the above entitled cause
and for demurrer to the Bill and to each and every count thereof
separately and severally says:

1. There is no equity in the Bill.


Solicitor for Respondent.

CHANCERY EXECUTION

BILL OF COSTS

No. 114

VS.

PLAINTIFF

DEFENDANT

FEES OF REGISTER		Dollars	Cents	Brought Forward	
Filing each bill and other papers	\$ 10			For Receiving, keeping and paying out or distributing money, etc.: 1st \$1,000, 1%, all over \$1,000, and not over \$5,000, 3-4 of 1%; all over \$5,000 and not exceeding \$10,000, 1-2 of 1%, all over \$10,000 1-4 of 1%.	
Issuing each subpoena	50			Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.	
Issuing each copy thereof	40			Each notice sent by mail to creditor	15
Entering each return thereof	15			Filing receipting for and docketing each claim, etc.	25
For each order of publication	1 00			For all entries on subpoena docket, etc.	50
Issuing Writ of injunction	1 50			For all entries on commission docket, etc.	50
For each copy thereof	50			Making final record, per 100 words	15
Entering each return thereof	15			Certified copy of decree	1 00
Issuing Writ of Attachment	1 00			Report of divorce to State Health Office (Acts 1915)	50
Entering each return thereof	15				
Docketing each case	1 00			TOTAL FEES OF REGISTER	1 40
Entering each appearance	25				
Issuing each decree pro confesso on per ser.	1 00			FEES OF SHERIFF	
Issuing each decree pro confesso on publica	1 00			Serving and returning subpoena on deft.	\$1 50
Each order appointing guardian	1 00			Serving and returning subpoena for witness	65
Any other order by Register	50			Levy on attachment	3 00
Issuing Commission to take testimony	50			Entering and returning same	25
Receiving and filing	10			Selling property attached	
Endorsing each package	10			Impaneling Jury	75
Entering order submitting cause	50			Executing Writ of possession	2 50
Entering any other order of court	25			Collecting execution for costs	1 50
Noting all testimony	50			Serving and returning sci. fa., each	65
Abstract of cause, etc.	1 00			Serving and returning notice	65
Entering each decree	75			Serving and returning writ of injunction	1 50
For every 100 words over 500	15			Serving and returning writ of exeat	1 50
Taking account, etc.	3 00			Taking and approving bonds, each	75
Taking testimony, etc.	15			Collecting money on execution	
Each report, 500 words or less	2 50			Making Deed	2 50
For every 100 words over 500	15			Serving and returning application, etc.	1 00
Amount claimed less than \$500, etc.	2 00			Serving attachment, contempt of court	1 50
Issuing each subpoena	25				
Witness certificate, each	25			TOTAL FEES OF SHERIFF	1 50
Issuing execution, each	75				
Entering each return	15			RECAPITULATION	
Taking and approving bond, each	1 00			Register's Fees	
Making copy of bill, etc.	15			Sheriff's Fees	
Each notice not otherwise provided for	50			Commissioner's Fees	
Each certificate or affidavit, with seal	50			Solicitor's Fees	
Each certificate or affidavit, no seal	25			Witness Fees	
Hearing and passing on application, etc.	3 00			Guardian Ad Litem	
Each settlement with Receiver, etc.	3 00			Printer's Fees	
Examining each voucher of Receiver, etc.	10			Trial Tax	3 00
Examining each answer, etc.	3 00			Recording Decree in Probate Court	
Recording resignation, etc.	75				
Entering each certificate to Supreme Court	50				
Taking questions and answers, etc.	25				
For all other ser relating to such proceedings	1 00				
For services in proceeding to relieve minors, etc., same fee as in similar cases.					
Commission on sales, etc: 1st \$100, 2 per cent: all over \$100 and not exceeding \$1,000, 1 1-2 per cent; all over \$1,000, and not exceeding \$20,000, 1 per ct; all over 20,000, 1-4 of 1 per cent					
Sub Total Carried Forward				TOTAL	16 90

The State of Alabama, {
Baldwin County

No. 114

Circuit Court, In Equity

Term, 193

To any Sheriff of the State of Alabama—GREETING:

You are hereby commanded, That of the goods and chattels, lands and tenements of

Defendant

you cause to be made the sum of

Dollars,

which

Plaintiff

recovered of on the 3 day of July 193

by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of

Dollars,

costs o' suit, and have the same to render to the said

and make return of this Writ and the execution thereof, according to law.

Interest from 193 to date of collection.

Witness my hand, this day of 193

Register

TO THE HONORABLE FRANCIS W. HARE, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Come now your orators, Virginia E. Holmes, and P. E.

Holmes, Jr., each of whom is over the age of twenty-one years, and who reside in Baldwin County, Alabama, and exhibit this their bill of complaint against the Farmers Supply Company, Inc., whose principal place of business is in Atmore, Escambia County, Alabama, and respectfully show unto your Honors as follows, viz:

FIRST: That the said Virginia E. Holmes, P. E. Holmes, Jr., and P. E. Holmes, Sr., executed a mortgage in favor of the said Farmers Supply Company, Inc. dated the 10th day of March, 1931, and payable September 1st, 1931, in the sum of \$163.85, said mortgage being recorded in Mortgage Book 51 pages 520-21 in the Probate Records of Baldwin County, Alabama, upon the following described property situated in Baldwin County, Alabama, to-wit:

The Southwest quarter of the southwest quarter of section 3, Township 2 North, Range 3 East; the southwest quarter of the northwest quarter; the southeast quarter of the northwest quarter and fractional part of the Northeast quarter of the Northwest quarter of section 3, Township 2 North of Range 3 East containing 152 acres, more or less, The Northwest quarter of the Northwest quarter of section 33, Township 3 North of Range 3 East, containing 10 acres, more or less.

Your orators further show that said mortgage was given to secure advances up to the sum of \$150.00 made by the said Farmers Supply Company, inc. to your orators, or either of them, during the year 1931, but said advances were not to exceed the sum of \$150.00. Your orators further show that the excess of said principal amount over and above the sum of \$150.00 represents the interest on said sum of \$150.00 and the privilege tax and recording fee on account of said mortgage amounting to \$1.85.

SECOND: Your orators further show that the said P. E. Holmes, Sr. died subsequent to the execution of said mortgage, that the said Virginia E. Holmes is the widow of the said P. E. Holmes, Sr., and that the said P. E. Holmes, Jr. is the son of your oratrix and the said P. E. Holmes, Sr.

THIRD: Your orators further show that the said mortgage was usurious in that there was included in the principal thereof the sum of \$12.00 as interest which was the equivalent of 8% per annum on said

sum of \$150.00. Your orators further show that said mortgage became due and payable five months ^{and 21 days,} after the date of the execution thereof. Your orators further show that said advances were made during the months of March, April, May and June, 1931, and that the said Farmers Supply Company, Inc. claims that the advances during said month of March amounted to \$57.02, during said month of April amounted to \$46.70, during said month of May amounted to \$27.55, and during the month of June amounted to \$17.73, which sums amount to a total of \$149.00. Your orators further show, however, that the total advances made on account of said mortgage amounted only to \$131.00.

FOURTH. Your orators further show that the said P. E. Holmes, Jr. in the fall of the year 1931 delivered to the said Farmers Supply Company, Inc. two bales of cotton and the seed therefrom, the proceeds of which were to be credited on said mortgage indebtedness. Your orators further show that the said Farmers Supply Company, Inc. has never furnished your orators with a statement of said cotton, and that your orators do not know the amount of credit on said mortgage to which they are entitled on account of said cotton.

FIFTH: Your orators further show that the said Farmers Supply Company, Inc. claim that said mortgage is in default, and have given notice by publication that they will proceed to foreclose said mortgage by selling said property upon to-wit, the 7th day of March, 1933, in front of the Court House in Bay Minette, Baldwin County, Alabama.

SIXTH: Your orators further allege that the said Virginia E. Holmes is the owner of the land hereinabove described, and that she inherited the same from her father, Thomas H. Boyles, who was deceased prior to the execution of said mortgage.

SEVENTH: Your orators further aver that at the time of the execution of said mortgage it was agreed between the parties thereto, viz: The said Virginia E. Holmes, P. E. Holmes, Sr. and P. E. Holmes, Jr. of the one part, and the officer of the Farmers Supply Company, Inc. who handled said transaction as the representative of the Farmers Supply Company, Inc., of the other part, that said mortgage should only cover the Southwest quarter of the Southwest quarter of section 3, Township

2 North of Range 3 East, Baldwin County, Alabama, but that through a mistake of the scrivener the other lands were included in said mortgage, viz: The southwest quarter of the Northwest quarter, the Southeast quarter of the Northwest quarter, and the fractional part of the Northeast quarter of the Northwest quarter of section 3, Township 2 North, Range 3 East; and the Northwest quarter of the Northwest quarter of section 33, Township 3 North of Range 3 East, containing 10 acres, more or less. Your orators further show that said mortgage was not read over to your orators, and that they signed the same upon the representation of the said officer of the said Farmers Supply Company, Inc., that said instrument was drawn in accordance with the agreement of the parties, as hereinabove set out, but your orators further show that the writing in fact was not drawn in accordance with the said agreement of the parties. Your orators further show that said mortgage was delivered to the said Farmers Supply Company, Inc. and that your orators did not discover the mistake until they saw the notice of the foreclosure sale under said mortgage, and which was published in the Baldwin County Times.

And your orators pray that your Honor will decree that they are entitled to relief, and that your Honor will ascertain the advances made by the said Farmers Supply Company, Inc. to your orators, and the credits, if any thereon, to which your orators are entitled, and that your Honor will ascertain the balance due from your orators to the Farmers Supply Company, Inc. on account of said mortgage, and that your Honor will direct the Register of this Court to hold a reference to ascertain the advances and credits, and the balance due on account of said mortgage; and that your Honor will decree that said mortgage be reformed with respect to the description of the lands described therein, so that said mortgage shall describe only the Southwest quarter of the Southwest quarter of section 3, Township 2 North of Range 3 East, Baldwin County, Alabama. And that your Honor will decree that your orators be allowed to redeem the land described in said mortgage upon the payment of any balance that shall be found to be due from your orators to the said Farmers Supply Company, Inc.

And if your orators have not asked for the proper relief, your orators further pray that they may have such other and further relief in the premises as the nature of their case shall require, and as to your Honor may seem meet.

And your orators submit themselves to the court, and offer to do whatever the court may consider necessary to be done on their part towards making the decree which they seek just and equitable with regard to the other parties to the suit; and especially do they offer to pay any balance that may be ascertained by the court to be due from them to the said Farmers Supply Company, Inc., under said mortgage.

And may it please your Honor to grant to your orators the writ of summons of the State of Alabama, to be directed to the said Farmers Supply Company, duly commanding it to appear before your Honor in this Honorable court, as required by law, and then and there to answer all and singular the premises, and to stand to and abide such orders and decrees therein as to this Honorable Court shall seem meet.

And may it further please your Honor to grant unto your orators the writ of injunction of the State of Alabama, to be directed to the said Farmers Supply Company, Inc. restraining them, their servants, agents or employees from foreclosing or attempting to foreclose, pending this suit, said mortgage executed by the said Virginia E. Holmes, P. E. Holmes, Sr. and P. E. Holmes, Jr., in favor of said Farmers Supply Company, Inc., said mortgage being dated March 10th, 1931, and recorded in Mortgage Book No. 51 pages 520-21, in the Probate Records of Baldwin County, Alabama, or until the further orders of this court.

And your orators shall ever pray, etc.

Jesse F. Hogan
and
S. Jenkins

Solicitors for Complainants.

FOOT NOTE:

The respondent, the Farmers Supply Company, Inc., is hereby required to answer the allegations of the foregoing bill of complaint, from paragraph One to paragraph Seven, inclusive, but not under oath, oath to answer being expressly waived.

Jesse F. Hogan
and
S. Jenkins

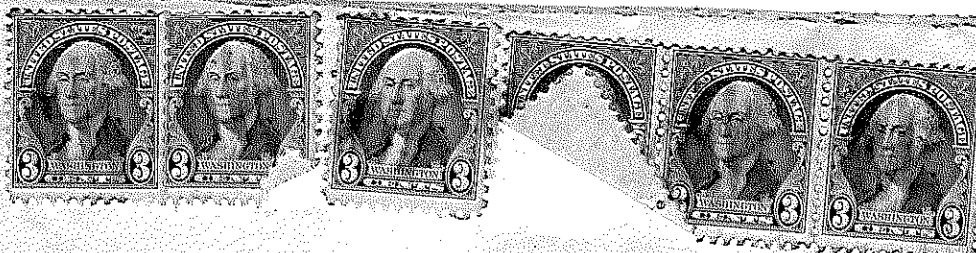
Solicitors for Complainants

Responded
Serious accepted,
March 6, 1933,

J. B. Blackburn,
Attorney for
Farmers Supply Co.,
a corporation.

Filed March 6, 1933
D. M. Richardson
Clerk.

After five days return to
T. W. RICHERRSON
Register and Clerk of the Circuit Court
Baldwin County
BAY MINETTE, ALA.



RETURN TO WRITER
REASON FOR NON-DELIVERY CIRCLED
Undelivered.....Unknown.....
Decayed.....For better address.....
Moved, left no address.....Refused.....
No such post office in state named.....

750

Deliver to addressee only.

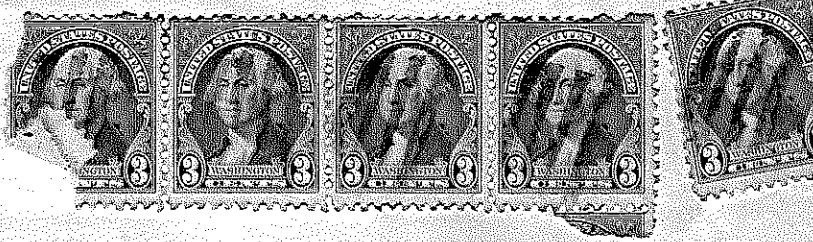
(Deliver to addressee only) **Albert E. Schalkenbach**
(Return receipt requested) **Taconic Lake**
Petersburg
New York.

Return Receipt Requested
Fee Paid

9924-21248
Quinnville
N.Y.

RETURN TO WRITER
REASON FOR NON-DELIVERY CIRCLED
Undelivered.....Unknown.....
Decayed.....For better address.....
Moved, left no address.....Refused.....
No such post office in state named.....

After five days return to
T. W. RICHERRSON
Register and Clerk of the Circuit Court
Baldwin County
BAY MINETTE, ALA.



REGISTERED
749

Deliver to addressee only.

Return Receipt Requested
Fee Paid

(Deliver to addressee only) **Alfred P. Schalkenbach**
(Return Receipt requested) **13411 - 105th Avenue**
Richmond Hill Long
Island New York.

UNCLAIMED

RECEIPT FOR REGISTERED ARTICLE NO. 749 *Papers*
15 fee paid. postage paid. 3-24-1933
From **T. W. Richerson** (Sender)
Addressed to **Alfred P. Schalkenbach** (Post office and State)
13411 - 105th Avenue (Street and number)
Accepting employee will place initials in space below indicating restricted delivery.
Return receipt fee 3 *Island New York*
Delivery restricted to addressee in person. special delivery fee
or order. Postmaster, per 2

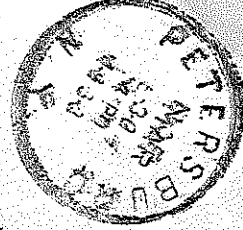
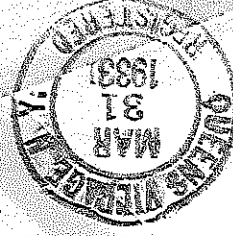
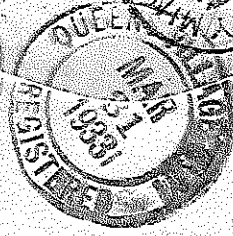
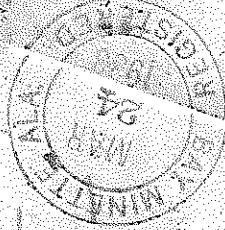
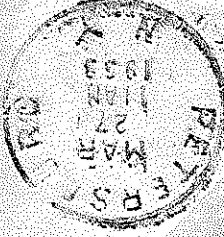
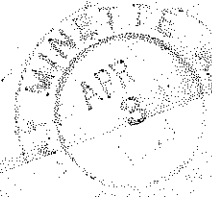
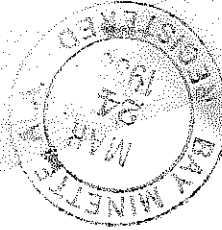
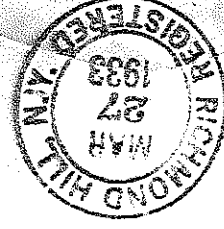
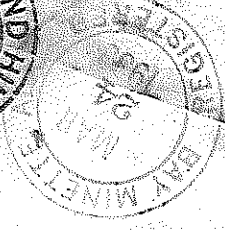
RECEIPT FOR REGISTERED ARTICLE NO. 750 *Papers*
15 fee paid. 1 class postage paid. 3-24-1933
From **T. W. Richerson** (Sender)
Addressed to **Albert E. Schalkenbach** (Post office and State)
Taconic Lake (Street and number)
Accepting employee will place initials in space below indicating restricted delivery.
Return receipt fee 3
Delivery restricted to person. Postmaster, per
or order

Second Notice, No Reply

To First Notice

8/27

MAR 30 1933 R



Removed left
address

313-
3/31/33