

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 **Charles. Ford.**

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

Inez. Ford.

against said **Charles. Ford.**

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 **26th** day

of **Sept.** 193**6**

Robert S. Duck

Register

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

Inez Ford, Complainant)
vs)
Charles Ford, Respondent)

In The Circuit Court of Baldwin
County, Alabama.
In Equity. No -----

To The Honorable Francis W Hare, Judge of the Twenty First Judicial Cir-
-cuit of Alabama, which includes Baldwin County:

Humbly complaining, your Oratrix, Inez Ford, respectfully represents unto
your Honor as follows:-

1. That your Oratrix, the said Inez Ford, and said Charles Ford, the
respondent, were legally married in Baldwin County, Alabama, on to wit,
November 15th, 19 and lived together as husband and wife until, to wit,
November 1st, 1935, when respondent's conduct ^(for more than a year prior thereto) towards your Oratrix became
so mean and cruel that her health began to decline with the result re-
spondent left her and has not since resided with her. At the time of the
separation between your Oratrix and the respondent, to wit, Nov. 1st, 1935,
they had been living in a house in Bay Minette, Alabama, owned by your
Oratrix's father, William H Chandler and she is still residing there with
her fourteen year old son and respondent lives at another place in the town
of Bay Minette, Alabama. Your Oratrix and respondent are both over the age
twenty one years and both are bona fide residents of Baldwin County, Alabama
and have been so for over fifteen years .


2. Your Oratrix further states that at the time of the separation of the
respondent from your Oratrix, to wit, November 1st, 1935, he cursed and
abused her and made threats to whip her; that about five months before this
time, respondent made similar threats to whip her and the only way she
saved herself from this humiliation was to get out of his way and go into
another part of the house and at other times he cursed, abused her and made
threats to whip her; these constant threats of abuse and whipping caused
your Oratrix's health to decline and ^(his conduct) caused her to have a reasonable appre-
hension of actual violence on her person as to endanger her life and health

3. That as a further ground of divorce, your Oratrix, the said Inez Ford,
states and alleges that for two years next preceeding to the filing of her
Bill of Complaint in this cause, the respondent, the said Charles Ford, did
not contribute anything towards her support and maintenance, with the result
that during all that time she had to work out for a living and to work on
government relief to obtain the actual necessities for living; that this was
true before ^{was} she separated from his bed and board and has been true since.

That Your oratrix has lived separate and apart from respondent's bed and
board for two years next preceeding the filing of her Bill of complaint in
this cause.

Wherefore , the premises considered, your Oratrix, the said Inez Ford, prays that a subpoena be issued and directed to the said Charles Ford, the respondent aforesaid, in this cause; that he brought into this Honorable Court and be directed to answer the charges herein made against him under the rules of this Honorable court ; that he be made a party defendant to the Bill of complaint filed in this cause and that upon a final hearing of the evidence offered in this cause, your Honor will order, adjudge and decree that the bonds of matrimony heretofore existing between your - Oratrix and the respondent, the said Charles Ford, be forever dissolved and that your Honor will, also, order, adjudge and decree that your Oratrix be permitted to marry again and that she be granted such other and further relief as may in equity and good conscience may seem meet and proper to your Honor .


And Your Oratrix will ever pray etc.



Solicitor for the Complainant

Foot Note:

The respondent is required to answer each and every paragraph of the foregoing Bill of Complaint from item 1 to item 3 inclusive, but his answer under oath is hereby expressly waived.



Solicitor for the Complainant.

RECORDED
INDEXED
6.501

Handwritten signature
Handwritten text

Sept 26, 1936
E. J. [unclear]

RECORDED
INDEXED
6-501

Serve on Charles Ford.

Circuit Court of Baldwin County
IN EQUITY

No. _____
S U M M O N S

Inez Ford.

VS.
Charles Ford.

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this 26th

day of Sept, 1935

Arthur Jenkins
SHERIFF

Executed this 28th day of
Sept 1935

by leaving a copy of the within Summons with

Charles Ford
Defendant

M. H. Williams
Sheriff

By S. C. Jenkins
Deputy Sheriff

S C Jenkins.
Solicitor for Complainant

Recorded in Vol. _____ Page _____