

The State of Alabama,  
Baldwin County.

No. .... CIRCUIT COURT IN EQUITY.

MAUDIE MAE SMITH,

Complainant

vs.

ALBERT SMITH,

Defendant

Motion is hereby made for a Decree Pro Confesso against

ALBERT SMITH,

Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant....; and that said summons was duly served according to law, and that said Defendant...ha.s...failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 25th day of July 19 38

BEEBE, HALL & BEEBE

Solicitor,

MAUDIE MAE SMITH,  
Complainant,  
VS.  
ALBERT SMITH,  
Respondent.

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

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

Comes your Complainant, MAUDIE MAE SMITH, and humbly complaining against the Respondent, ALBERT SMITH, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That your Complainant is a bona fide resident of Baldwin County, Alabama, nineteen years of age; that the Respondent is over twenty-one years of age and a resident of Brewton, in Escambia County, Alabama.

2. That the Complainant and Respondent were married at Brewton, in Escambia County, Alabama, on May 3rd, 1935, and lived together as husband and wife until to-wit, September, 1936.

3. That on to-wit, in September, 1936, the Respondent threatened and abused the Complainant, and on several occasions committed actual violence to her person by striking her; that the conduct of the Respondent was such that she had and still has every reasonable apprehension to believe and did believe that if she should continue to live with him, he would carry out his threats and do further violence to her person, which would necessarily endanger her life and health.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said ALBERT SMITH party respondent to this Bill of Complaint, requiring him 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.

Complainant prays that upon a final hearing of this cause, your Honor will give and grant unto her a decree of absolute divorce, forever barring the bonds of matrimony existing between her and the Respondent, ALBERT SMITH; that your Honor will give and grant unto her such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as

in duty bound she will ever pray.

*Reber Lee & Pugh*  

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Solicitors for Complainant.

FOOT NOTE:

The Respondent, ALBERT SMITH, is required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 3, inclusive, but not under oath, oath being hereby expressly waived.

*Reber Lee & Pugh*  

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Solicitors for Complainant.

MAUDIE MAE SMITH,  
Complainant,  
vs.  
ALBERT SMITH,  
Respondent.

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

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

Comes your Complainant, MAUDIE MAE SMITH, and humbly complaining against the Respondent, ALBERT SMITH, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That your Complainant is a bona fide resident of Baldwin County, Alabama, nineteen years of age; that the Respondent is over twenty-one years of age and a resident of Brewton, in Escambia County, Alabama.
2. That the Complainant and Respondent were married at Brewton, in Escambia County, Alabama, on May 3rd, 1935, and lived together as husband and wife until to-wit, September, 1936.
3. That on to-wit, in September, 1936, the Respondent threatened and abused the Complainant, and on several occasions committed actual violence to her person by striking her; that the conduct of the Respondent was such that she had and still has every reasonable apprehension to believe and did believe that if she should continue to live with him, he would carry out his threats and do further violence to her person, which would necessarily endanger her life and health.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said ALBERT SMITH party respondent to this Bill of Complaint, requiring him 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.

Complainant prays that upon a final hearing of this cause, your Honor will give and grant unto her a decree of absolute divorce, forever barring the bonds of matrimony existing between her and the Respondent, ALBERT SMITH; that your Honor will give and grant unto her such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as

in duty bound she will ever pray.

*Becker Lally & Becker*  
Solicitors for Complainant.

FILED  
1914  
MAY 10 11 AM  
COURT HOUSE  
ST. LOUIS, MO.

The Respondent, ALBERT SMITH, is required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 3, affirmative, but not under oath, oath being hereby expressly waived.

BY REC'D  
ENTERED CORRECTION  
IN SEE CIRCUIT

*Becker Lally & Becker*  
Solicitors for Complainant.

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 ALBERT SMITH,

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

MAUDIE MAE SMITH,

against said ALBERT SMITH,

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, M. A. Stone, Register of said Circuit Court, this 1st day of June 1938

*R. A. Stone*

Register

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

The State of Alabama,  
Baldwin County.

No. 424 ... CIRCUIT COURT IN EQUITY.

MAUDIE MAE SMITH,

Complainant

vs.

ALBERT SMITH,

Defendant

In this cause it appears to the Register  
that a summons requiring the Defendant ALBERT SMITH,

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days  
after the service of said Summons upon ALBERT SMITH,  
was served upon him by the Sheriff of Baldwin County, Alabama, on the  
24th day of June 1938

And the said Defendant... having failed to demur, plead to or answer the said Bill of Complaint  
to this date, it is now, therefore, on motion of Beebe, Hall & Beebe

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things  
taken as confessed against the said Albert Smith

Defendant aforesaid.

This 25th day of July 19 38

*Radecan*

Register.

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

**CIRCUIT COURT, IN EQUITY**

**MAUDIE MAE SMITH,**

**Complainant,**

vs.

**ALBERT SMITH,**

**Respondent.**

**MOTION FOR DECREE PRO  
CONFESSO ON PERSONAL SERVICE**

Filed July 25, 1938

*R. S. Duck*

Register.

Recorded in \_\_\_\_\_ Record.

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Register.



DECEMBER 7:5-64 *Book 4*

No. 424

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

**CIRCUIT COURT, IN EQUITY**

MAUDIE MAE SMITH,

Complainant

vs.

ALBERT SMITH,

Respondent.

DECREE PRO CONFESSO ON  
PERSONAL SERVICE

Issued July 25th, 19 38

*W. S. Duck*  
Register.

Moore Printing Company, Bay Minette, Ala.

183  
(original)

*Foley*

SERVE ON Albert Smith,  
Foley, Alabama.  
Circuit Court of Baldwin County  
IN EQUITY

No. 424  
SUMMONS

MAUDIE MAE SMITH,  
Complainant,

vs.

ALBERT SMITH,  
Respondent.

BEEBE, HALL & BEEBE,  
Solicitor for Complainant

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

*Quick*  
RECORDED 9-472

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Received in office this \_\_\_\_\_  
day of \_\_\_\_\_ 193\_\_

SHERIFF

Executed this 24<sup>th</sup> day of  
June 1938  
by leaving a copy of the within Summons with

Albert Smith  
Defendant

W. H. Wicklin  
Sheriff

By John Collins  
Deputy Sheriff

BILL OF COMPLAINT

MAUDIE MAE SMITH,

Complainant,

ALBERT WELCH,

Respondent.

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

Filed this 30 day May 1935

R. S. Dyer

Clerk-Register

*[Signature]*

to this court and will over pray.

RECORDED *Book*  
9-442

BILL OF COMPLAINT:

MAUDIE MAE SMITH,  
Complainant,

VS.

ALBERT SMITH,  
Respondent.

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

FILED

Filed this 30 day *Aug* 1935

*R. S. D.*  
Clerk-Register