

SPECIAL APPEARANCE AND PLEA TO THE JURISDICTION.

AMELIA BEACH CHANDLER) IN THE CIRCUIT COURT OF BALDWIN COUNTY
VS) ALABAMA. EQUITY SIDE.
SIMEON CHANDLER.)

Now comes the respondent Simeon Chandler and enters this his special appearance for the purpose of filing this his plea to the jurisdiction of this court and for no other purpose.

PLEA TOTHE JURISDICTION

1st. Comes the respondent Simeon Chandler, and for plea in abatement to the complaint says that this court oughtnot to have ~~take~~ take further jurisdiction of this cause because that at the time said writ was issued the complainant was not a resident of Baldwin County, Alabama, but was merely a visitor and was at the time of the issuance of said writ a resident of Bartholomew ~~Wiley~~ County State of Indiana, and had only been in the State of Alabama for about ten months, as a visitor.

2nd.

for further plea in abatement to the complaint respondent Simeon Chandler says that this court ought not to have or take further jurisdiction of this cause because at the time said writ was issued neither the complainant nor the respondent were residents of Baldwin County State of Alabama but were residents of Bartholomew ~~Wiley~~ County State of Indiana, and both had been visitors to Baldwin County State of Alabama for a period of about ten months, and neither were citizens of The State of Alabama.

3rd.

For further plea in abatement to the complaint respondent Simeon Chandler says that this court ought not to have or to take further jurisdiction of this cause because at the time of the filing of the complaint in this cause the complainant was a non resident of The State of Alabama and resided in Bartholomew ~~Wiley~~ County State of Indiana, and was on a visit to the State of Alabama.

4th.

for further plea in abatement to the complaint respondent Simeon Chandler says that this court ought not to have or to take further jurisdiction of this cause because at the time of the filing of the complaint in this cause the complainant was a non resident of the State of Alabama.

-----X
 AMELIA B. CHANDLER,)
 Complainant.)
 - vs -)
 SIMEON CHANDLER.)
 Defendant.)
 -----X

IN THE CIRCUIT COURT-EQUITY SIDE.
 STATE OF ALABAMA.
 BALDWIN COUNTY.
 No. 211.

STATE OF ALABAMA.
 BALDWIN COUNTY.

Personally appeared before me. Norborne Stone, a Notary Public in and for said county and state, Simeon Chandler, who is known to me and who, after being by me first duly sworn, deposes and says under oath;

My name is Simeon Chandler. I am the defendant in the above stated cause wherein Amelia B. Chandler is the complainant and I am a citizen of the State of Indiana, Bartholamew County, and came to Alabama for a visit on the 20th day of February, 1919 with my wife, the above named Amelia B. Chandler, This visit was made on account of the health and mental condition of my said wife who was judicially declared insane in the State of Indiana.

That Amelia B. Chandler voluntarily deserted and abandoned affiant on December 28th, 1919 and at that time left the State of Alabama with their infant child Edmund B. Chandler and affiant is informed that she lives in Pensacola, Florida. She only resided in this state from February 20th, 1919 to December 28th, 1919.

That affiant is not a citizen or permanent resident of the State of Alabama.

Simeon Chandler

Sworn to and subscribed before me this 27th day of January, 1920.
Norborne Stone
 Notary Public, Baldwin County, Ala.



TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT
COURT OF BALDWIN COUNTY, ALABAMA: SITTING IN EQUITY.

Comes your Oratrix, AMELIA BEACH CHANDLER, and hum-
bly complaining against SIMEON CHANDLER, respectfully shows
unto your honor as follows:

FIRST: That your Oratrix and the said SIMEON CHANDLER
are over the age of twenty-one years and reside at Foley,
Alabama, Baldwin County; that they are husband and wife, hav-
ing intermarried September 11th, 1915, at Columbus, India-
ana.

SECOND: That there was born to them one child, EDMUND
BEACH CHANDLER, whose age is three years, and who is now in
the custody of your Oratrix.

THIRD: That your Oratrix and the said SIMEON CHANDLER
lived together as husband and wife until to-wit, October 25,
1919; that after the marriage of your Oratrix to the said
SIMEON CHANDLER, it developed that he was a man of uncontrol-
able temper and from time to time, becoming angered, abused
your Oratrix, cursing her, and calling her diver and sundry
vile, abusive, obscene and vulgar names, and threatenting
her life; that he has grown steadily worse and on to-wit,
October 25th, 1919, in a violent out-burst of anger, cursed,
kicked and struck her a number of times and choked her to,
choke her, inflicting bodily injury from which she has not
yet recovered; that there is reasonable apprehension from his
conduct that it would be dangerous to her life or health to
continue to live with him.

FOURTH: That your Oratrix is without means of sup-
port, owning no property, and having no employment, and has
been unable to get employment; that the said SIMEON CHANDLER

has some monies, the amount of which is unknown to your Oratrix, but she has been informed that he has stated to neighbors that he has \$3000.00 in cash; that he is an experienced Steam Engineer, and is amply able to support your Oratrix and their child, the said EDMUND BEACH CHANDLER, in a manner suitable to their station in life.

The premises considered, your Oratrix prays that the said SIMEON CHANDLER be by appropriate process made a party defendant to this bill of complaint and required to answer the same within the time prescribed by law and abide such orders as your Honor may make in the premises.

Oratrix further prays that an order of reference be made forthwith directing the Register to ascertain and report such amounts as will be suitable and proper to be allowed Oratrix out of the estate of defendant as alimony, pendente lite and as counsel fees for the prosecution of this cause, and that upon such report being filed and order requiring the payment by the defendant of such sum be made.

Oratrix further prays that upon the final hearing of this cause a decree be rendered forever divorcing Oratrix from the said SIMEON CHANDLER, granting to her the custody of the child of the marriage, the right to re-marry, should she so desire, to be free from trouble and interference on the part of the defendant, together with such sum for permanent alimony as shall to the court seem proper, and such other further, or different relief as to your Honor shall seem meet.

Rickaby, Frazier & Beck
SOLICITORS FOR COMPLAINANT.

The defendant is required to answer each and every allegation of the foregoing bill of complaint, paragraphs 1 to 4 inclusive, but not under oath, his oath is hereby expressly waived.

Rickaby, Frazier & Beck
SOLICITORS FOR COMPLAINANT.

Amelia Chandler

Simon Chandler

Filed Jan 2, 1920

Filed Jan 2, 1920

Thompson

Reyer

Bay Minette. Ala. Jan. 16th. 1920

I hereby accept service of the within complaint this Jan. 16th. 1920

at 9.30 O Clock A M

Simon Chandler

Witness

Frank Stone

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Faint handwritten text, possibly a signature or name, mostly illegible.

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 Simeon Chandler

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

~~Simeon Chandler~~

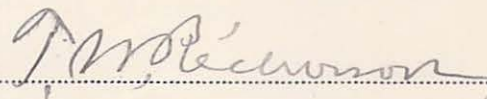
Amelia Beach Chandler

against said Simeon Chandler

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 2nd day of January

1919



Register.

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

Copy
Serve on *Simon Chandler*

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No.

SUMMONS.

Amelia Beach
Chandler

vs.

Simon Chandler

Richard Gray Duke
Solicitor for Complainant.

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this

day of 191.....

Sheriff.

Executed this day of

191.....

by leaving a copy of the within Summons with

Defendant

Sheriff

By

Deputy Sheriff.

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BALDWIN COUNTY.

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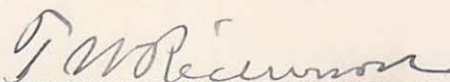
Amelia Beach Chandler

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Original

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CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No.

SUMMONS.

Amelia Beach Chandler

vs.

Simon Chandler

*Accepted Service
see Bill of Complaint*

Richard G. Frazier & Peck

Solicitor for Complainant.

Recorded in Vol. Page

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BALDWIN COUNTY.

Received in office this

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Sheriff.

Executed this day of

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by leaving a copy of the within Summons with

Defendant

Sheriff

By

Deputy Sheriff.

1610