

2458

WILBURN PARKER,	¶	IN THE CIRCUIT COURT OF
Complainant,	¶	BALDWIN COUNTY, ALABAMA
vs.	¶	IN EQUITY
ALLIE PARKER,	¶	NO. 2458.
Respondent.	¶	

TO THE HONORABLE TELFAIR J. MASHBURN, JR., CHANCELLOR OF THE
CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Comes the Respondent, Allie Parker, in the above
styled cause and for answer to the Bill of Complaint heretofore
filed in said cause and to each and every paragraph thereof, sep-
arately and severally says as follows:

1. That she admits the allegations of the first
paragraph of the said Bill of Complaint.
2. That she admits all of the allegations of the
second paragraph of the said Bill of Complaint except wherein the
Complainant alleges that he and the Respondent were married at Bay
Minette, Alabama, on July 3, 1924; and for further answer to said
second paragraph of the Bill of Complaint, Respondent alleges that
she and the Complainant were married at Bay Minette, Alabama, on
July 3, 1923.
3. That she denies the allegations of the third
paragraph of the Bill of Complaint and demands strict proof thereof.
4. For further answer to the said Bill of Complaint,
the Respondent says that on or about April 20, 1950, the Complainant
threatened to commit actual violence upon her person and forced her
to leave their home in fear of such violence. That the Complainant
and your Respondent have two minor children, Roy Parker, age 18,
and Dorothy Parker, age 15, both of whom reside at Rabon. That
your Respondent is a suitable, fit and proper person to have the
sole care and custody of the two said minor children and that the
Complainant is not a fit and proper person to have the care and
custody of the two minor children, aforesaid.
5. That your Respondent is unable to earn a living
and she has been living with one of her sons since to-wit, April
21, 1950, who has been helping to support her and that she has no

money or property with which to support herself or her two minor children or with which to employ Solicitors to defend this suit. That your Respondent has no property of her own, either real or personal, out of which she could purchase a suitable home for herself and her two minor children and that she was driven out of the home in which she and the Complainant were residing, by the Complainant.

WHEREFORE, your Respondent prays that this Court will grant to her a divorce from the Complainant and that this Court will order and decree that the Complainant pay to her a reasonable amount as alimony and that the Complainant be ordered to provide a sufficient sum of money each month for the maintenance, support and education of the two minor children named above and that the Court will order that the home in which she was living at the time the Complainant forced her to leave be turned over to her and that your Honor will ascertain and fix a reasonable Solicitor's fee to be paid her Solicitors, Chason & Stone, for their services in this matter. Your Respondent prays for such other, further and general relief as in the premises shall be meet and proper.

Chason & Stone,
By: Melrose Stone
Solicitors for Respondent.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ALLIE PARKER, to appear and plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in equity, by Wilburn Parker, as Complainant and against Allie Parker, as Respondent.

WITNESS my hand this 28th day of April, 1950.

Deice J. Lucke
REGISTER

WILBURN PARKER

COMPLAINANT

VS

ALLIE PARKER

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

TO HON. TELFAIR J. MASHEURN JR, JUDGE OF THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.

Your Complainant, Wilburn Parker, respectfully represents and shows
unto your Honor and this Honorable Court as follows:

1.

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

2.

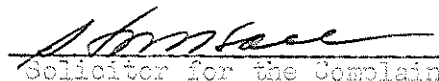
That your Complainant and the Respondent are husband and wife having
married at Bay Minette, Alabama, on July 3, 1924; that they lived together
as husband and wife in Baldwin County, Alabama until April 20, 1950.

3.

That on April 20, 1950, the Respondent committed the act of adultery
with one Aubrey Cooper; that said act of adultery on the part of the
Complainant was without the consent or approval of the Complainant and
that the Complainant has not condoned said act.

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

Complainant further prays that upon a final hearing hereof your Honor will make and enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; that he be granted such other, further, different or general relief as he may be in equity and good conscience entitled to receive.


Solicitor for the Complainant