

Mary Dunson,  
Complainant  
Vs.  
C. W. Dunson,  
Respondent.

In the Circuit Court for the  
County of Baldwin, State of Alabama.  
In Equity.

Comes now the above named Respondent, C. W. Dunson,  
and accepts service of a copy of the bill of complaint filed  
in the above entitled cause, and waives any further or other  
notice of the issuance of a commission to take testimony, or  
the taking of testimony, and agrees that said testimony may be  
taken at any time or place without notice to him, and agrees  
that said cause may be submitted for final decree at any time  
and without notice to him.

Answering said bill of complaint, Respondent admits the  
allegations of paragraph one of the bill.

Respondent admits the allegations of paragraph two  
of the bill.

Respondent denies each allegation of paragraph three of  
the bill and demands strict proof of same.

Dated this the 14 day of March, 1950.

C W Dunson  
Respondent.

The State of Alabama )  
Baldwin County )

Personally appeared before me, the undersigned authority,  
a Notary Public in and for said county in said state, C. W. Dunson,  
who being by me first duly sworn deposes and says that he is the  
respondent named in the above stated cause, that he signed the  
foregoing waiver and answer voluntarily, in my presence, that he  
is fully informed of its contents.

Given under my hand and seal on this the 14 day  
of March, 1950.

[Signature]  
Notary Public.

RECORDED

No. 2444

Mary Dunson

vs

CW Dunson

Answer and

Verdict

Respondent

FILED

MAR 15 1950

ALICE J. DUCK, Register

Mrs. Mary Dunson,  
Complainant

Vs.

C. W. Dunson,  
Respondent

In the Circuit Court of  
Baldwin County, Alabama.  
In Equity.

To the Honorable Telfair J. Mashburn, Judge of said Court:

Your complainant, Mary Dunson, would show unto your

Honorable the facts following:

1st. That your complainant is a resident of Baldwin County, Alabama, over the age of twenty one years, and has been a resident of said county for more than two years next preceding the filing of this bill of complaint. That the respondent, C. W. Dunson, is a resident of Baldwin County, Alabama and is over the age of twenty one years.

2nd. That complainant and respondent were married on December 20, 1937 in the city of Lakeland, Florida and lived together as man and wife until, to-wit, December 26, 1949 when they separated and since said date have not lived together. No children were born of said marriage.

3rd. That on, to-wit, December 26, 1949 respondent committed actual violence upon the person of complainant, attended with danger to her life or health, That is to say, on said day and date the respondent knocked the complainant down by striking her and then kicked the complainant twice on her body.

Premises considered, your complainant prays that your honor take jurisdiction of this her cause, and that by proper process the respondent be required to plead, answer or demurr to this bill of complaint within the time allowed by law for pleading, and upon a final hearing of this cause, your honor will make and enter a decree forever dissolving the bonds of matrimony existing between the complainant and respondent, and grant to complainant an absolute divorce from said respondent.

  
Solicitor for Complainant.

RECORDED  
No. 2444

Mary Duncan  
vs  
C W Duncan

Original Bill

2444

FILED

MAR 15 1960

ALICE J. DUCK, Register

W. A. Duncan  
Sol for Complainant