

3546

-----*

JOSEPH EDGAR HAMMETT,	:	
	:	
Complainant,	:	IN THE CIRCUIT COURT OF
	:	BALDWIN COUNTY, ALABAMA.
-vs-	:	IN EQUITY.
	:	
D'LOIS BOND BERRET, formerly	:	
D'Lois Bond Hammett,	:	
	:	
Defendant.	:	

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE SAID COURT,
SITTING IN EQUITY:

Comes your complainant, Joseph Edgar Hammett, and respectfully represents and shows unto your Honor as follows:

1. Your complainant shows that he and the defendant were formerly man and wife but by decree of June 17th, 1948, D'Lois Bond Hammett was awarded a decree of divorce from complainant, and complainant further shows that by the terms of that decree the custody of the minor children, Betty Joan Hammett and Jo Ruth Hammett, was divided between complainant and defendant in such manner as to award the custody of the said children to D'Lois Bond Berret, formerly Hammett, for nine months of the year or during their school term and for three months during the summer, during their summer vacation, to complainant.

2. Your complainant further shows that by decree of the Court dated May 25th, 1955, the said D'Lois Bond Berret, formerly Hammett, was ordered to deliver to the complainant on June 6th, 1955, the custody of Betty Joan Hammett and Jo Ruth Hammett, and your complainant shows that he has requested that the children be delivered to him in accordance with the decree of the Court, the said decree having been entered by Walter D. Coleman, Chancellor of the Chancery Court of the County of Adams, State of Mississippi, on, to-wit, the 25th day of May, 1955 aforesaid; that following the entry of this decree and order complainant went to Jackson, Mississippi, to get his children but discovered that D'Lois Bond Berret, the defendant in this cause, had taken the children and had left the jurisdiction of the courts of Mississippi without having advised

of orders, judgments and decrees to be employed in evidence in courts other than the court of issuance.

4. Your complainant shows that both he and the defendant, D'Lois Bond Berret, are over the age of twenty-one years and that the said D'Lois Bond Berret and the said children, namely, Betty Joan Hammett and Jo Ruth Hammett, are presently in Fairhope, Baldwin County, Alabama, within the jurisdiction of this Court.

PRAYER FOR PROCESS

Your complainant prays that the said D'Lois Bond Berret, who presently resides at 206 S. Mobile Avenue, Fairhope, Alabama, be made a party defendant to this your complainant's bill of complaint, and that the usual process be issued and served upon her commanding her within the time required by law to come in and plead, answer or demur to this bill of complaint.

PRAYER FOR RELIEF

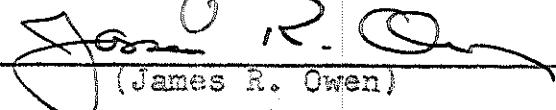
Your complainant prays that upon a final hearing hereof your Honor will be pleased to give full faith and credit to the decree and order of the Chancery Court of Adams County, State of Mississippi, in accordance with the Constitution and Laws of the United States of America, and that your Honor will order and direct the defendant to deliver to complainant his children, the said Betty Joan Hammett and Jo Ruth Hammett, in accordance with the decree and order of the said Court.

And your complainant prays for such other, further and different relief as he may be entitled to receive, the premises considered.

And in duty bound he will ever pray.

McCORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS,

By



 (James R. Owen)

Solicitors for the Complainant.

the Court or this complainant of such action on her part. In this connection your complainant shows that his solicitors in Natchez, Mississippi, and in Mobile, Alabama, have endeavored to communicate with the said D'Lois Bond Berret, formerly Hammett, and complainant shows that on Friday, June 10th, 1955, his solicitor, L. C. Gwin, of Natchez, Mississippi, talked to D'Lois Bond Berret and to John R. Berret, her husband, telling them that complainant wished his children delivered to him in accordance with the decree of the court; that the said D'Lois Bond Berret stated at that time that she would not surrender the children; that following these conversations complainant came to Mobile, Alabama, and endeavored through his solicitors to talk with the said D'Lois Bond Berret; that the solicitors of complainant called the telephone number of the defendant in Fairhope, Alabama, namely, Waverly 8-9812, and that someone, presumably the defendant, answered the telephone but as soon as the name Hammett was spoken she hung up the telephone, and although repeated efforts were made to communicate with her by telephone no answer was given such call; that thereupon complainant and his solicitor went by automobile to Fairhope, Alabama, to the place of residence of D'Lois Bond Berret and found no one at home; that the said D'Lois Bond Berret told complainant some time ago that she would give him trouble, and complainant states that her refusal to obey the decree of the Court or to communicate with him or his solicitors in any way results from her carrying out that threat.

3. Your complainant attaches hereto and incorporates by reference a photostatic copy of the order of the Honorable Walter D. Coleman, Chancellor of the Chancery Court, County of Adams, State of Mississippi, directing that the custody of the children be delivered to him on June 6th, 1955, the said order having been duly certified by the Honorable Walter D. Coleman, Chancellor, and Robert E. Burns, Clerk of the said Court, in accordance with the Acts of Congress relative to the exemplification

STATE OF MISSISSIPPI

COUNTY OF ADAMS

IN THE CHANCERY COURT

IN VACATION, 1955

D'LOIS BOND HAMMETT
(NOW D'LOIS BOND BERRET)

VS

JOSEPH EDGAR HAMMETT

C/ 11,517
B/ 323

DECREE

This Cause coming on this day for hearing upon petition of the above named Complainant for citation and adjudication of the Defendant for Contempt of Court for failure to make payment of the allowance for support and maintenance of the minor children of the parties, made by decrees of June 17, 1948 of record in Minute Book X at page 259 and of November 5, 1948 enrolled in Minute Book Y at page 241, filed July 19, 1954 and upon answer of the Defendant thereto and evidence had and taken in open Court upon petition of the above named Complainant for modification of the above mentioned decrees regarding the custody of the minor children of the parties, namely Betty Joan Hammett and Jo Ruth Hammett, upon answer of the Defendant made in short by consent and upon evidence had and taken in open Court, both parties being present in open Court and represented by counsel and consenting and agreeing that all of the issues made by the above petitions and answers and other pleadings be consolidated and heard together and at the same time and it appearing to the Court that all necessary and proper parties are properly before the Court and that the Court has full jurisdiction of the parties and of the subject matter in this Cause;

And it appearing to the Court that upon the issue of the non-payment of monthly allowances for the support and maintenance of the two (2) children that the Defendant is not guilty of contempt and that the amounts as alleged by the petition for citation and adjudication for contempt are not owing by the Defendant to the Complainant and that the Defendant is not in arrears at this time upon said payment in any amount;

And it further appearing to the Court upon the issue made by the petition of the Complainant for modification of the decrees touching the custody of said children that the prayer of the said petition should be by the Court denied;

And it further appearing to the Court that by the terms of the above mentioned previous decrees of this Court, the Defendant is entitled to the custody of said children for and during the summer months while the regular school term is not in session and that the said regular school term of the Jackson, Mississippi school attended by the said minor children will end on the 3rd day of June, 1955;

It is thereupon Ordered, Adjudged and Decreed that the petition of the Complainant for citation and adjudication of the Defendant as being in contempt of this Court for non-payment of allowances for support and maintenance of the said minor children be, and the same hereby is, dismissed with prejudice and the Defendant discharged;

Further Ordered, Adjudged and Decreed that the petition of the said Complainant for modification of the decrees of June 17, 1948 enrolled in Minute Book X at page 259 and the decree of November 5, 1948 enrolled in Minute Book Y at page 241 be, and the same hereby is, dismissed and that the prayer of the said petition for modification of said decrees be, and the same hereby is, denied;

Further Ordered, Adjudged and Decreed that the custody of the minor children, Betty Joan Hammett and Jo Ruth Hammett, be by the said Complainant delivered over to the Defendant, Joseph Edgar Hammett, in accordance with the terms of said decrees of June 17, 1948 and November 5, 1948, on the 6 day of June, 1955.

ORDERED, ADJUDGED and DECREED this the 25 day of May, 1955.

s/ Walter D. Coleman

CHANCELLOR

State of Mississippi
County of Adams

I, Robert E. Burns, Chancery Clerk in and for said County and State do hereby certify that the above and foregoing instrument is a true and correct copy of original recorded in Book 28 Page 191 in the office of the Chancery Clerk, Adams County, Mississippi.

-2-

Given under my hand and official seal this the 11 day of June A. D., 1955

ROBERT E. BURNS, Chancery Clerk

By Mary Ann Curry C.

THE STATE OF MISSISSIPPI }
COUNTY OF ADAMS

SCT.

CHANCERY COURT

I, Walter D. Coleman sole presiding Chancellor
of said Court, do hereby certify that Robert E. Burns
whose genuine signature is to the foregoing Certificate, is now, and was at the time of making
said signature, Clerk of the said Chancery Court aforesaid, duly commissioned and qualified
according to law; and that his Certificate and attestation are in due form.

In testimony whereof I have hereunto subscribed my name

this 11 day of June, A. D. 1955

Walter D. Coleman

Chancellor 17th District

THE STATE OF MISSISSIPPI }
COUNTY OF ADAMS

SCT.

CHANCERY COURT

I, Robert E. Burns Clerk of said Court, do hereby
certify that Walter D. Coleman, whose name is signed to the
foregoing Certificate, is now, and was at the time of signing the same, the sole presiding Chan-
cellor of said Court, duly commissioned and qualified according to law.

Witness my hand and seal of said Court, at the City of Natchez,

this 11 day of June, A. D. 1955

Robert E. Burns

SUMMONS AND COMPLAINT

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. _____

TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ~~D^e LOIS BOND BERRET, formerly~~~~D^e LOIS BOND HAMMETT~~

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against ~~D^e LOIS BOND BERRET,~~

~~formerly D^e LOIS BOND HAMMETT~~, Defendant.

by ~~JOSEPH EDGAR HAMMETT~~, Plaintiff.

Witness my hand this 11th. day of June 19 55.

Alice J. Duck
D.V.

Clerk

No. _____ Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed _____ 19____

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19____

, Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with

Sheriff

Deputy Sheriff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. _____

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon D¹ LOIS BOND BERRET, formerly

D¹ LOIS BOND HAMMETT

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against D¹ LOIS BOND BERRET,
formerly D¹ LOIS BOND HAMMETT, Defendant

by JOSEPH EDGAR HAMMETT, Plaintiff

Witness my hand this 11th. day of June 19 55.

Alice J. Duck, Clerk
S. J.

JOSEPH EDGAR HAMMETT,

Complainant,

-vs-

D'LOIS BOND BERRET, formerly
D'Lois Bond Hammett,

Defendant.

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

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE SAID COURT,
SITTING IN EQUITY:

Comes your complainant, Joseph Edgar Hammett, and respectfully represents and shows unto your Honor as follows:

1. Your complainant shows that he and the defendant were formerly man and wife but by decree of June 17th, 1948, D'Lois Bond Hammett was awarded a decree of divorce from complainant, and complainant further shows that by the terms of that decree the custody of the minor children, Betty Joan Hammett and Jo Ruth Hammett, was divided between complainant and defendant in such manner as to award the custody of the said children to D'Lois Bond Berret, formerly Hammett, for nine months of the year or during their school term and for three months during the summer, during their summer vacation, to complainant.

2. Your complainant further shows that by decree of the Court dated May 25th, 1955, the said D'Lois Bond Berret, formerly Hammett, was ordered to deliver to the complainant on June 6th, 1955, the custody of Betty Joan Hammett and Jo Ruth Hammett, and your complainant shows that he has requested that the children be delivered to him in accordance with the decree of the Court, the said decree having been entered by Walter D. Coleman, Chancellor of the Chancery Court of the County of Adams, State of Mississippi, on, to-wit, the 25th day of May, 1955 aforesaid; that following the entry of this decree and order complainant went to Jackson, Mississippi, to get his children but discovered that D'Lois Bond Berret, the defendant in this cause, had taken the children and had left the jurisdiction of the courts of Mississippi without having advised

the Court or this complainant of such action on her part. In this connection your complainant shows that his solicitors in Natchez, Mississippi, and in Mobile, Alabama, have endeavored to communicate with the said D'Lois Bond Berret, formerly Hammett, and complainant shows that on Friday, June 10th, 1955, his solicitor, L. C. Gwin, of Natchez, Mississippi, talked to D'Lois Bond Berret and to John R. Berret, her husband, telling them that complainant wished his children delivered to him in accordance with the decree of the court; that the said D'Lois Bond Berret stated at that time that she would not surrender the children; that following these conversations complainant came to Mobile, Alabama, and endeavored through his solicitors to talk with the said D'Lois Bond Berret; that the solicitors of complainant called the telephone number of the defendant in Fairhope, Alabama, namely, Waverly 8-9812, and that someone, presumably the defendant, answered the telephone but as soon as the name Hammett was spoken she hung up the telephone, and although repeated efforts were made to communicate with her by telephone no answer was given such call; that thereupon complainant and his solicitor went by automobile to Fairhope, Alabama, to the place of residence of D'Lois Bond Berret and found no one at home; that the said D'Lois Bond Berret told complainant some time ago that she would give him trouble, and complainant states that her refusal to obey the decree of the Court or to communicate with him or his solicitors in any way results from her carrying out that threat.

3. Your complainant attaches hereto and incorporates by reference a photostatic copy of the order of the Honorable Walter D. Coleman, Chancellor of the Chancery Court, County of Adams, State of Mississippi, directing that the custody of the children be delivered to him on June 6th, 1955, the said order having been duly certified by the Honorable Walter D. Coleman, Chancellor, and Robert E. Burns, Clerk of the said Court, in accordance with the Acts of Congress relative to the exemplification

of orders, judgments and decrees to be employed in evidence in courts other than the court of issuance.

4. Your complainant shows that both he and the defendant, D'Lois Bond Berret, are over the age of twenty-one years and that the said D'Lois Bond Berret and the said children, namely, Betty Joan Hammett and Jo Ruth Hammett, are presently in Fairhope, Baldwin County, Alabama, within the jurisdiction of this Court.

PRAYER FOR PROCESS

Your complainant prays that the said D'Lois Bond Berret, who presently resides at 206 S. Mobile Avenue, Fairhope, Alabama, be made a party defendant to this your complainant's bill of complaint, and that the usual process be issued and served upon her commanding her within the time required by law to come in and plead, answer or demur to this bill of complaint.

PRAYER FOR RELIEF

Your complainant prays that upon a final hearing hereof your Honor will be pleased to give full faith and credit to the decree and order of the Chancery Court of Adams County, State of Mississippi, in accordance with the Constitution and Laws of the United States of America, and that your Honor will order and direct the defendant to deliver to complainant his children, the said Betty Joan Hammett and Jo Ruth Hammett, in accordance with the decree and order of the said Court.

And your complainant prays for such other, further and different relief as he may be entitled to receive, the premises considered.

And in duty bound he will ever pray.

MCCORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS,

By



(James R. Owen)

Solicitors for the Complainant.

STATE OF MISSISSIPPI

COUNTY OF ADAMS

IN THE CHANCERY COURT

IN VACATION, 1955

D'LOIS BOND HAMMETT
(NOW D'LOIS BOND BERRET)

VS

JOSEPH EDGAR HAMMETT

C# 11,517
B# 323

DECREE

This Cause coming on this day for hearing upon petition of the above named Complainant for citation and adjudication of the Defendant for Contempt of Court for failure to make payment of the allowance for support and maintenance of the minor children of the parties, made by decrees of June 17, 1948 of record in Minute Book X at page 259 and of November 5, 1948 enrolled in Minute Book Y at page 241, filed July 19, 1954 and upon answer of the Defendant thereto and evidence had and taken in open Court upon petition of the above named Complainant for modification of the above mentioned decrees regarding the custody of the minor children of the parties, namely Betty Joan Hammett and Jo Ruth Hammett, upon answer of the Defendant made in short by consent and upon evidence had and taken in open Court, both parties being present in open Court and represented by counsel and consenting and agreeing that all of the issues made by the above petitions and answers and other pleadings be consolidated and heard together and at the same time and it appearing to the Court that all necessary and proper parties are properly before the Court and that the Court has full jurisdiction of the parties and of the subject matter in this Cause;

And it appearing to the Court that upon the issue of the non-payment of monthly allowances for the support and maintenance of the two (2) children that the Defendant is not guilty of contempt and that the amounts as alleged by the petition for citation and adjudication for contempt are not owing by the Defendant to the Complainant and that the Defendant is not in arrears at this time upon said payment in any amount;

And it further appearing to the Court upon the issue made by the petition of the Complainant for modification of the decrees touching the custody of said children that the prayer of the said petition should be by the Court denied;

And it further appearing to the Court that by the terms of the above mentioned previous decrees of this Court, the Defendant is entitled to the custody of said children for and during the summer months while the regular school term is not in session and that the said regular school term of the Jackson, Mississippi school attended by the said minor children will end on the 3rd day of June, 1955;

It is thereupon Ordered, Adjudged and Decreed that the petition of the Complainant for citation and adjudication of the Defendant as being in contempt of this Court for non-payment of allowances for support and maintenance of the said minor children be, and the same hereby is, dismissed with prejudice and the Defendant discharged;

Further Ordered, Adjudged and Decreed that the petition of the said Complainant for modification of the decrees of June 17, 1948 enrolled in Minute Book X at page 259 and the decree of November 5, 1948 enrolled in Minute Book Y at page 241 be, and the same hereby is, dismissed and that the prayer of the said petition for modification of said decrees be, and the same hereby is, denied;

Further Ordered, Adjudged and Decreed that the custody of the minor children, Betty Joan Hammett and Jo Ruth Hammett, be by the said Complainant delivered over to the Defendant, Joseph Edgar Hammett, in accordance with the terms of said decrees of June 17, 1948 and November 5, 1948, on the 6 day of June, 1955.

ORDERED, ADJUDGED and DECREED this the 25 day of May, 1955.

s/ Walter D. Coleman

CHANCELLOR

State of Mississippi
County of Adams

I, Robert E. Burns, Chancery Clerk in and for said County and State do hereby certify that the above and foregoing instrument is a true and correct copy of original recorded in Book 26 Page 191 in the office of the Chancery Clerk, Adams County, Mississippi.

-2-

Given under my hand and official seal this the

11 day of June A. D. 1955

ROBERT E. BURNS, Chancery Clerk

By Mary Quinn Curry C.

THE STATE OF MISSISSIPPI }
COUNTY OF ADAMS

SCT.

CHANCERY COURT

I, Walter D. Coleman sole presiding Chancellor
of said Court, do hereby certify that Robert E. Burns

whose genuine signature is to the foregoing Certificate, is now, and was at the time of making
said signature, Clerk of the said Chancery Court aforesaid, duly commissioned and qualified
according to law; and that his Certificate and attestation are in due form.

In testimony whereof I have hereunto subscribed my name

this 11 day of June, A. D. 19 55

Walter D. Coleman

Chancellor 17th District

THE STATE OF MISSISSIPPI }
COUNTY OF ADAMS

SCT.

CHANCERY COURT

I, Robert E. Burns, Clerk of said Court, do hereby
certify that Walter D. Coleman, whose name is signed to the
foregoing Certificate, is now, and was at the time of signing the same, the sole presiding Chan-
cellor of said Court, duly commissioned and qualified according to law.

Witness my hand and seal of said Court, at the City of Natchez,

this 11 day of June, A. D. 1955

Robert E. Burns

JOSEPH EDGAR HAMMETT,

Complainant,

VS.

D'LOIS BOND BERRET, formerly
D'Lois Bond Hammett,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

ORDER

The original Bill of Complaint and the amendment to the original Bill of Complaint in the above styled cause having been presented to me on this date, and it appearing to the court that the Defendant is in contempt of court by not conforming to the decree heretofore rendered by Walter D. Coleman, Chancellor of the Chancery Court of Adams County, Mississippi, as shown in the Complaint and that it is to the best interests of said minor children, Betty Joan Hammett and Jo Ruth Hammett that they be placed in the temporary care, custody and control of the Complainant, it is, therefore,

ORDERED, ADJUDGED AND DECREED that the Complainant shall have and he is hereby awarded the temporary care, custody and control of the said minor children pending a final decree in this cause and the Sheriff of Baldwin County is hereby ordered and directed to forthwith take the said minor children into custody and deliver them to the Complainant in this cause Joseph Edgar Hammett.

ORDERED, ADJUDGED AND DECREED on this the 14th day of June, 1955.

Hubert M. Hall
Judge.

3546

ORDER

JOSEPH EDGAR HAMMETT,

Complainant,

VS.

D'LOIS BOND BERRET, formerly
D'Lois Bond Hammett,

Defendant.

TAYLOR WILKINS, Sheriff

By _____ D. S.

Returned 20 day of June 1955
it found in my county after diligent search and in-
try.

Taylor Wilkins, Sheriff

By Geo H. Crawford
Deputy Sheriff

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Filed 6-14-55
Annie French
Clerk

JOSEPH EDGAR HAMMETT,

Complainant,

VS.

D'LOIS BOND BERRET, formerly
D'Lois Bond Hammett,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

ORDER

The original Bill of Complaint and the amendment to the original Bill of Complaint in the above styled cause having been presented to me on this date, and it appearing to the court that the Defendant is in contempt of court by not conforming to the decree heretofore rendered by Walter D. Coleman, Chancellor of the Chancery Court of Adams County, Mississippi, as shown in the Complaint and that it is to the best interests of said minor children, Betty Joan Hammett and Jo Ruth Hammett that they be placed in the temporary care, custody and control of the Complainant, it is, therefore,

ORDERED, ADJUDGED AND DECREED that the Complainant shall have and he is hereby awarded the temporary care, custody and control of the said minor children pending a final decree in this cause and the Sheriff of Baldwin County is hereby ordered and directed to forthwith take the said minor children into custody and deliver them to the Complainant in this cause Joseph Edgar Hammett.

ORDERED, ADJUDGED AND DECREED on this the 14th day of June, 1955.

/s/ Hubert M. Hall

Judge.

ORDER

JOSEPH EDGAR HAMMETT,

Complainant,

VS.

D'LOIS BOND BERRET, formerly

D'Lois Bond Hammett,

Defendant.

12/11/1911

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

ORDERED, ADJUDGED AND DECREED on this 11th day of
June, 1911, that the said minor children be placed
in the temporary care, custody and control of the
Complainant, and that it is to the best interests of said minor child-
ren, Betty Jean Hammett and Jo Ruth Hammett that they be placed
in the temporary care, custody and control of the Complainant.
The original Bill of Complaint and the amendment to the
original Bill of Complaint in the above styled cause having been
presented to me on this date, and it appearing to the court that
the defendant is in contempt of court by not conforming to the
decree heretofore rendered by Walter D. Coleman, Chancellor of the
Chancery Court of Adams County, Mississippi, as shown in the
Complaint and that it is to the best interests of said minor child-
ren, Betty Jean Hammett and Jo Ruth Hammett that they be placed
in the temporary care, custody and control of the Complainant, it
is, therefore,
ORDERED, ADJUDGED AND DECREED that the Complainant shall
have and he is hereby awarded the temporary care, custody and con-
trol of the said minor children pending a final decree in this
cause and the Sheriff of Baldwin County is hereby ordered and
directed to forthwith take the said minor children into custody
and deliver them to the Complainant in this cause.

is, therefore,
in the temporary care, custody and control of the Complainant,
ren, Betty Jean Hammett and Jo Ruth Hammett that they be placed
Complaint and that it is to the best interests of said minor child-
Chancery Court of Adams County, Mississippi, as shown in the
decree heretofore rendered by Walter D. Coleman, Chancellor of the
the defendant is in contempt of court by not conforming to the
presented to me on this date, and it appearing to the court that
original Bill of Complaint in the above styled cause having been
The original Bill of Complaint and the amendment to the

ORDER

Defendant.

D'LOIS BOND BERRET, formerly
D'Lois Bond Hammett,

VS.

Complainant,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

JOSEPH EDGAR HAMMETT,

JOSEPH EDGAR HAMMETT,

Complainant,

VS.

D'LOIS BOND BERRET, formerly
D'Lois Bond Hammett,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Now comes the Complainant in the above styled cause and amends his Prayer for Relief in the original Bill of Complaint by adding thereto the following:

Complainant further prays that the court will make and enter an order granting your Complainant the temporary care, custody and control of the said minor children pending a final decree in this cause.

McCORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS,

By /s/ C. M. A. Rogers

James R. Owen
(James R. Owen)

Solicitors for the Complainant.

Received 14 day of June 1955
and on _____ day of _____ 19____
served a copy of the within Amend. to Bill Comp.
n _____
by service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

Returned 20 day of June 1955
Not found in my county after diligent search and in-
quiry.

Taylor Wilkins, Sheriff
By Geo. H. Crawford
Deputy Sheriff

AMENDMENT TO THE BILL OF COM-
PLAINT

JOSEPH EDGAR HAMMETT,

Complainant,

VS.

D'LOIS BOND BERRET, formerly

D'Lois Bond Hammett,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

Filed 6-14-55
Wick
Ren

2025
JOSEPH EDGAR HAMMETT,

Complainant,

VS.

D'LOIS BOND BERRET, formerly
D'Lois Bond Hammett,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

Now comes the Complainant in the above styled cause and amends his Prayer for Relief in the original Bill of Complaint by adding thereto the following:

Complainant further prays that the court will make and enter an order granting your Complainant the temporary care, custody and control of the said minor children pending a final decree in this cause.

McCORVEY, TURNER, ROGERS, JOHNSTONE & ADAMS,

By /s/ C. M. G. Rogers

James R. Owen
(James R. Owen)

Solicitors for the Complainant.

IN EQUITY

BALDWIN COUNTY, ALABAMA
IN THE CIRCUIT COURT OF

Defendant,

D'LOIS BOND BERRET, formerly
D'LOIS BOND HAMMETT,

VS.

Complainant

JOSEPH EDGAR HAMMETT,

COMPLAINT
AMENDMENT TO THE BILL OF

AMENDMENT TO THE BILL OF
COMPLAINT

JOSEPH EDGAR HAMMETT,

Complainant,

VS.

D'LOIS BOND BERRET, formerly
D'Lois Bond Hammett,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

AMENDMENT TO THE BILL OF COMPLAINT

JOSEPH EDGAR HAMMETT

VS.
D'LOIS BOND BERRET, formerly
D'Lois Bond Hammett,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

AMENDMENT TO THE BILL OF COMPLAINT

JOSEPH EDGAR HAMMETT,

Complainant,

VS.

D'LOIS BOND BERRET, formerly
D'Lois Bond Hammett,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

AMENDMENT TO THE BILL OF COMPLAINT

JOSEPH EDGAR HAMMETT

VS.

D'LOIS BOND BERRET, formerly
D'Lois Bond Hammett,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

AMENDMENT TO THE BILL OF COMPLAINT

JOSEPH EDGAR HAMMETT

3546