

STATE OF ALABAMA

BALDWIN COUNTY

IN THE MATTER OF THE PETITION )  
FOR RECIPROCAL ENFORCEMENT OF )  
SUPPORT OF DEPENDENT )  
AGNES LOUISE DAVISON, )  
PETITIONER, )

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

VS. )

EMMETT MILTON DAVISON, )  
RESPONDENT. )

This cause coming on to be heard was submitted upon a certified copy of a petition filed in this Court by Agnes Louise Davison, under the provisions of Reciprocal Legislation as set forth in Code of Alabama, 1940, as amended, Title 34, Sections 105 to 122, inclusive. A copy of said petition was duly served upon the Respondent, Emmett Milton Davison on the 4th day of June, 1954, and the evidence in the cause heard on this date.

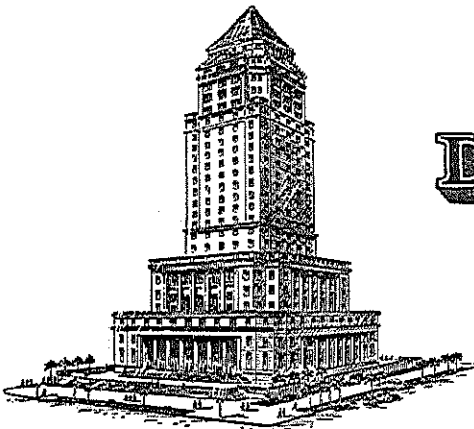
IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by this Court that Emmett Milton Davison, the Respondent, pay to the Complainant, Agnes Louise Davison, for the support of their two children, Emmett Milton Davison, Jr and John Charles Davison, the sum of thirty (\$30.00) dollars per month, payable monthly. Said payments will be submitted on the 1st day of each month to the Register, Circuit Court, Baldwin County, Alabama, who will transmit said payments to the Circuit Court, Eleventh Judicial Circuit, Dade County, Miami, Florida.

IT IS FURTHER ORDERED AND ADJUDGED by the Court that the said Emmett Milton Davison pay all costs of court in connection with this cause.

DATED this 11th day of June, 1954.

*Hubert M. Steer*  
Judge, Circuit Court Baldwin County,  
Alabama, in Equity.

Filed  
6-11-54  
Aimee J. Duck  
Ray



DADE COUNTY COURT HOUSE

# DADE COUNTY

MIAMI 6, FLORIDA

OFFICE OF  
E. B. LEATHERMAN  
CLERK OF CIRCUIT COURT  
AND RECORDER  
P. O. BOX 1031

April  
1954  
19th

Clerk of Circuit Court  
Baldwin County  
Bay Minette, Ala.

Re: DAVISON, Agnes Louise vs. Emmett Milton Davison

Dear Sir:

At the direction of the State's Attorney's office we are forwarding herewith, various papers, pertaining to the above styled cause, as reflected in Clerk's Certificate, copy of which is also enclosed.

Kindly acknowledge receipt of subject enclosures, at your earliest convenience, by signing and returning the attached carbon copy of this letter.

All monies received from Respondent for benefit of Petitioner should be made payable to Petitioner and sent to the Clerk of the Circuit Court, Dade County, Miami, Florida. Future correspondence concerning this case should be mailed to:

Hon. George A. Brautigam, State's Attorney  
Attention, Adele Segall Faske, Assistant  
Room 321, Court House, Miami, Florida

who represents Petitioner.

Yours very truly,

E. B. LEATHERMAN  
Clerk Circuit Court

BY: M. R. Murray  
Deputy Clerk

EBL/mrm

STATE OF FLORIDA

ELEVENTH JUDICIAL CIRCUIT OF FLORIDA  
IN AND FOR DADE COUNTY

AGNES LOUISE DAVIS ON  
Complainant

EMMETT MILTON DAVIS ON  
Defendant

INFORMATION OF: AGNES LOUISE DAVIS ON  
Complainant

1. Q. What is your name? A. AGNES LOUISE DAVIS ON
2. Q. Where are you living? A. 3111 N.W. 24th Street, Miami, Fla.  
Phone: --
3. Q. What is the name of your husband? A. EMMETT MILTON DAVIS ON
4. Q. Where is your husband now living? A. Somerdale, Ala.  
Phone: --
5. Q. When and where were you married? A. DATE: June 25, 1949  
LOCATION: Lucedale, Miss.
6. Q. Are you now married to the defendant? A. YES NO
7. Q. Were there any children of this marriage? A. YES 2 NO NO
8. Q. What are their names?
- 1-1-50 1. EMMETT MILTON DAVIS ON, JR. 4 yrs. 4.
- 6-29-51 2. JOHN CHARLES DAVIS ON 2 1/2 yrs. 5.
3.  6.
9. Q. When was it your husband last lived with you? A. October 17, 1953
10. Q. When and how much was his last contribution for support?  
A. November, 1953 - \$10.00
11. Q. Is there a complaint or order for support in any court? A. No
12. Q. Explain:
13. Q. Are you employed? YES NO Groveland Product Co.  
600 N.W. 10th St., Miami, Fla.
14. Q. What are your earnings? A. \$30.00 per week
15. Q. Have you any other source of income? A. No
16. Q. What is this source and how much? A. --
17. Q. What amount do you require for yourself and children per week? A.
18. Q. Do you know where your husband is employed? A. Emmett Gullledge  
Somerdale, Ala.
19. Q. What is his position and salary? A. Farmer
20. Q. Are you now receiving any public aid? A. No

DATE: March 22, 1954

Miami, Florida

Agnes Louise Davis On  
Signature of Complainant

The State of Alabama, \_\_\_\_\_ County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon

*Davison*

*Emmett Milton*

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State

*by Agnes Louise Davison*

against

*Emmett Milton Davison*

Herein fail not. Due return make of this writ as the law directs.

Witness this

*1st* day of

*June*, 19*54*

*Miss [Signature]*, Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

## 167450

AGNES LOUISE DAVISON being first duly sworn on oath  
deposes and says: that she is the petitioner in the above  
and foregoing petition by her subscribed, that she is insolvent  
and unable to pay the costs, fees and charges incident to the  
prosecution of said petition, and invokes the controlling  
provisions of Chapter 58.10 of the Florida Statutes Annotated.

Jessica R. Warner  
Notary Public

[illegible]

I hereby certify that I have made an investigation of Petitioner's affidavit of insolvency above, and I verily believe it to be true. That I have investigated the nature of Petitioner's claim as set forth in said petition and that in my opinion her claim is meritorious as a matter of law; and I have not been paid or promised payment of any fee or other remuneration for my services and intend to act as attorney for plaintiff without charge or compensation under the terms and conditions set forth in Chapter 27996, Laws of 1953.

Adelb. Segall Fols  
Assistant State Attorney.

167450

AGNES LOUISE DAVISON                      being first duly sworn on oath

Agnes Louise Garrison  
Petitioner

Jessica R. Warner  
Notary Public

My Commission Expires March 18, 1957.

I hereby certify that I have made an investigation of Petitioner's affidavit of insolvency above, and I verily believe it to be true. That I have investigated the nature of Petitioner's claim as set forth in said petition and that in my opinion her claim is meritorious as a matter of law; and I have not been paid or promised payment of any fee or other remuneration for my services and intend to act as attorney for plaintiff without charge or compensation under the terms and conditions set forth in Chapter 27996, Laws of 1953.

Adm. Legal Task  
Assistant State Attorney.

IN THE CIRCUIT COURT OF THE 11TH  
JUDICIAL CIRCUIT OF FLORIDA, IN  
AND FOR DADE COUNTY. IN CHANCERY

NUMBER \_\_\_\_\_

AGNES LOUISE DAVISON  
PETITIONER  
vs.  
EMMETT MILTON DAVISON  
RESPONDENT  
.....

P E T I T I O N

The petition of AGNES LOUISE DAVISON  
respectfully shows:

1. THAT she is the wife of EMMETT MILTON DAVISON  
\_\_\_\_\_, the respondent; that petitioner was duly married to said  
respondent on or about June 25, 1949  
at Lucedale, Miss.

2. THAT petitioner is the mother and said respondent is the father  
of the following named dependent (s).

- Emmett Milton Davis, Jr. 4 yrs.
- John Charles Davison, 2½ yrs.
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

3. THAT petitioner and said child ren are entitled to support  
from the respondent under the provisions of the Uniform Reciprocal Enforcement  
of Support Act of this State (Chapter 27996, Laws of 1953), a copy of which is  
attached and made a part hereof.

4. THAT respondent, on or about November, 1953  
and subsequent thereto, refused and neglected to provide fair and reasonable  
support for petitioner and the other dependents according to his means and  
earning capacity.



5. THAT, upon information and belief, respondent now is residing or domiciled at SOMERDALE, ALA., is earning \$ \_\_\_\_\_ per \_\_\_\_\_, and is within the jurisdiction of the Court of Alabama, which State has enacted a law substantially similar to the Uniform Reciprocal Enforcement of Support Act of this State.

WHEREFORE, the petitioner prays for such an order for support, directed to said respondent, as shall be deemed to be fair and reasonable, and for such other and further relief as the law provides.

Agnes Louise Davison  
PETITIONER

Personally appeared before me AGNES LOUISE DAVISON, to me personally known and made oath that she has read the above petition and knows the contents thereof, and that the same are true of her own knowledge except as to the matters stated on information and belief, and as to these matters she believes them to be true.

\_\_\_\_\_  
CLERK OF COURT

\_\_\_\_\_  
or  
Jessica R. Warner  
NOTARY PUBLIC, State of Florida at Large  
My Commission Expires March 18, 1957

SWORN TO AND SUBSCRIBED BEFORE ME THIS 22nd day of MARCH, 1954.

IN THE CIRCUIT COURT OF THE 11TH  
JUDICIAL CIRCUIT OF FLORIDA, IN  
AND FOR DADE COUNTY. IN CHANCERY

NUMBER 167459

AGNES LOUISE DAVISON  
PETITIONER  
vs.  
EMMETT MILTON DAVISON  
RESPONDENT  
.....

P E T I T I O N

The petition of AGNES LOUISE DAVISON  
respectfully shows:

1. THAT she is the wife of EMMETT MILTON DAVISON  
\_\_\_\_\_, the respondent; that petitioner was duly married to said  
respondent on or about June 25, 1949  
at Lucedale, Miss.

2. THAT petitioner is the mother and said respondent is the father  
of the following named dependent (s).

Emmett Milton Davison, Jr. 4 yrs.

John Charles Davison, 2½ yrs.

3. THAT petitioner and said children are entitled to support  
from the respondent under the provisions of the Uniform Reciprocal Enforcement  
of Support Act of this State (Chapter 27996, Laws of 1953), a copy of which is  
attached and made a part hereof.

4. THAT respondent, on or about November, 1953  
and subsequent thereto, refused and neglected to provide fair and reasonable  
support for petitioner and the other dependents according to his means and  
earning capacity.

WHEREFORE, the petitioner prays for such an order for support, directed to said respondent, as shall be deemed to be fair and reasonable, and for such other and further relief as the law provides.

\_\_\_\_\_, to me personally known and made oath that she has read the above petition and knows the contents thereof, and that the same are true of her own knowledge except as to the matters stated on information and belief, and as to these matters she believes them to be true.

or

Jessica L. Warner  
NOTARY PUBLIC, State of Florida at Large  
My Commission Expires March 18, 1995

-2-

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL  
CIRCUIT OF FLORIDA, IN AND FOR DADE COUNTY.

THE STATE OF FLORIDA

TO THE DEFENDANT(S)

Emmett Milton Davison  
Somerdale, Alabama

or

C/O Emmett Gullledge (Employer)  
Somerdale, Ala.

You are hereby notified that a suit has been brought against you in the Circuit Court  
for Dade County, Florida, in Chancery, by

AGNES LOUISE DAVISON

You are hereby summoned and required to serve upon:

Plaintiff's Attorney, whose address is:

Adele Segall Faske  
Assistant State Attorney  
321 Dade County Court House  
Miami, Florida

and file with the Clerk of said Court, either before service or immediately thereafter, an answer  
to the Bill of Complaint which is herewith served upon you, within 20 days after service of this  
summons upon you, exclusive of the day of service. If you fail to do so, Decree Pro Confesso will  
be entered against you for the relief demanded in the Bill of Complaint.

WITNESS my hand and seal of said Court at Miami, Dade County, Florida, this

22 day of MARCH, A.D. 1954

E. B. LEATHERMAN  
as Clerk of said Circuit Court

By W. M. W. STOCKING  
Deputy Clerk

ADELE SEGALL FASKE  
~~Plaintiff's Attorney~~  
Assistant State Attorney  
Petitioner's Representative

(Court Seal)

IN THE CIRCUIT COURT OF THE 11TH  
JUDICIAL CIRCUIT OF FLORIDA, IN  
AND FOR DADE COUNTY. IN CHANCERY

NUMBER 167450

AGNES LOUISE DAVISON

PETITIONER

VS.

A F F I D A V I T

EMMETT MILTON DAVISON

RESPONDENT

STATE OF FLORIDA:

SS:

COUNTY OF DADE :

Before me, a Notary Public, of the State of Florida, duly  
authorized to administer oaths, personally appeared one \_\_\_\_\_  
\_\_\_\_\_ who after having been duly sworn,  
deposes and says:

That he is a duly appointed Deputy Sheriff of the County of Dade and State of Florida, authorized to serve legal process; that a summons addressed to EMMETT MILTON DAVISON, respondent, was delivered to him for service upon the said respondent; that he has made diligent search and inquiry to locate him and has been unable to locate him in the State of Florida so as to effectuate service of process upon him, and that to the best of his knowledge and belief respondent is in the State of ALABAMA, at Somerdale,

W. W. THOMPSON  
DEPUTY SHERIFF

SWORN TO AND SUBSCRIBED BEFORE ME, this 22 day of

Mar, A.D. 195 4.

BETTY JANE OSWILL  
NOTARY PUBLIC, State of Florida  
at Large

My Commission Expires:

2-4-57

IN THE CIRCUIT COURT OF THE 11TH  
JUDICIAL CIRCUIT OF FLORIDA, IN  
AND FOR DADE COUNTY. IN CHANCERY

NUMBER 167450

AGNES LOUISE DAVISON  
PETITIONER

vs.

EMMETT MILTON DAVISON  
RESPONDENT

CERTIFICATE AND ORDER

The undersigned Circuit Judge hereby certifies as follows:

1. THAT a verified petition has been filed in this Court in a proceeding styled as above, against the above named respondent under the provisions of Chapter 27996, Laws of Florida 1953, to compel the support of the above named petitioner and of any other dependents named in the petition.

2. THAT a summons duly issued out of this Court for service upon the respondent has been returned with an affidavit to the effect that the respondent cannot with due diligence be located or served with such process in this State.

3. THAT the respondent is believed to be residing, or domiciled in the State of ALABAMA.

4. THAT in the opinion of the undersigned the respondent should be compelled to answer such petition and should be dealt with according to law.

It is therefore ORDERED AND DECREED that this certificate and exemplified copies of the petition heretofore filed in this cause and of the summons heretofore issued from this Court be transmitted by E. B.

LEATHERMAN, Clerk of this Court to Clerk of Circuit Court, Baldwin County,  
Bay Minette, Alabama  
for appropriate action and proceedings under the Reciprocal Laws of the  
State of ALABAMA and the State of Florida.

DONE AND ORDERED at Miami, Dade County, Florida, this 29  
day of March, A.D. 195 4.

N. VERNON HAWTHORNE  
CIRCUIT JUDGE

167450

STATE OF FLORIDA

ELEVENTH JUDICIAL CIRCUIT OF FLORIDA  
IN AND FOR DADE COUNTYAGNES LOUISE DAVIS ON

Complainant

EMMETT MILTON DAVIS ON

Defendant

INFORMATION OF: AGNES LOUISE DAVIS ON  
Complainant

1. Q. What is your name? A. AGNES LOUISE DAVIS ON
2. Q. Where are you living? A. 3111 N.W. 24th Street, Miami, Fla.  
Phone: --
3. Q. What is the name of your husband? A. EMMETT MILTON DAVIS ON
4. Q. Where is your husband now living? A. Somerdale, Ala.  
Phone:
5. Q. When and where were you married? A. DATE: June 25, 1949  
LOCATION: Lucedale, Miss.
6. Q. Are you now married to the defendant? A. YES            ~~NO~~
7. Q. Were there any children of this marriage? A. YES 2 ~~NO~~
8. Q. What are their names?
- 1-1-50 1. EMMETT MILTON DAVIS ON, JR. 4 yrs. 4.
- 6-29-51 2. JOHN CHARLES DAVIS ON 2 1/2 yrs. 5.
3.            6.
9. Q. When was it your husband last lived with you? A. October 17, 1953
10. Q. When and how much was his last contribution for support?  
A. November, 1953 - \$10.00
11. Q. Is there a complaint or order for support in any court? A. No
12. Q. Explain:
13. Q. Are you employed? YES            ~~NO~~ Groveland Product Co.  
600 N.W. 10th St., Miami, Fla.
14. Q. What are your earnings? A. \$30.00 per week
15. Q. Have you any other source of income? A. No
16. Q. What is this source and how much? A. --
17. Q. What amount do you require for yourself and children per week? A.
18. Q. Do you know where your husband is employed? A. Emmett Gullledge  
Somerdale, Ala.
19. Q. What is his position and salary? A. Farmer
20. Q. Are you now receiving any public aid? A. No

DATE: March 22, 1954

Miami, Florida

Agnes Louise Davison  
Signature of Complainant

NO 3241

*Aynes Louise Davison*

VSI

*Emmett Milton Davison*

and on 4 day of June 1924  
I served a copy of the within  
on \_\_\_\_\_  
By service *Emmett Milton Davison*

TAYLOR WILKINS, Sheriff  
By *Edley Steadler* D.S.

*Emmett Davison*

*Filed*  
*4-24-54*  
*Anie French*  
*Clery*



STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

In Equity

Case No. 3241

AGNES LOUISE DAVISON

Complainant,

Vs.

EMMETT MILTON DAVISON

Respondent.

This day came Kenneth Cooper, Solicitor for Petitioner and filed his petition praying that Emmett Milton Davison be required to appear and show cause, if any he have, why he should not be punished as for a contempt in regard to the nature of things set out in the petition; and upon consideration of the said petition, it is

ORDERED, ADJUDGED AND DECREED by the Court that the said Emmett Milton Davison appear before the Court at 9:00 ~~A~~ <sup>7<sup>th</sup></sup> ~~M~~ <sup>th</sup> on the ~~3rd~~ <sup>7<sup>th</sup></sup> day of ~~October~~ <sup>NOV</sup>, 1957, in the court room of the Circuit Court of Baldwin County, at Bay Minette, Alabama, and show cause, if any he have, why he should not be punished for a contempt.

Let a copy of said petition and of this rule to show cause be served forthwith, personally upon the said Emmett Milton Davison by the Sheriff of Baldwin County, Alabama.

Done this 6 th day of September, 1957.

Hubert M. Hall

Hubert M. Hall

Circuit Judge

STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

Equity Division

AGNES LOUISE DAVISON

Case No. 3241

Complainant

Vs.

EMMETT MILTON DAVISON

Respondent.

TO THE HONORABLE HUBERT M. HALL, JUDGE OF CIRCUIT  
COURT, BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Now comes the Complainant, represented by Kenneth  
Cooper, Solicitor for the 28th Judicial Circuit, State  
of Alabama, acting under the provisions of Article 4,  
Title 34, Sections 105 to 123, inclusive, Code of Ala-  
bama, 1940, as amended, and respectfully shows to the  
Court that by order of this Court made and entered on  
June 11th, 1954, the Respondent was  
ordered to pay to the Complainant the sum of \$30.00  
each Month for the support of his two  
dependent children, to-wit, Emmett Milton Davison, Jr.,  
and Charles Davison

AS PROVIDED UNDER THE PROVISIONS OF THE Uniform Recipro-  
cal Enforcement of Support Act (Act No. 879. General  
Acts of Alabama, 1951, and Act No. 823, General Acts of  
Alabama, 1953); that said Respondent has wilfully failed  
to pay the said sum; that the Complainant is entitled  
to the above said sums under the provisions of the said  
Acts.

Wherefore, the Complainant respectfully prays that  
the Court make and enter an order requiring the Respond-  
ent to show cause if any he has why he should not be  
adjudged guilty of contempt of this Court for failure  
to obey the order of this Court requiring him to pay  
to the Complainant the sum of \$ 30.00 each month.

Dated this 6th day of September, 1957.

*Kenneth Cooper*  
Kenneth Cooper, Solicitor

Received 15 day of Oct 1952  
and on 18 day of Oct 1952

served a copy of the within Petition  
on Emmett M. Davison

By service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By Charles Childress

Sumnerdale

Sheriff claims 60 miles at  
Ten Cents per mile Total \$ 6.00  
TAYLOR WILKINS, Sheriff  
BY Childress  
DEPUTY SHERIFF

3241 ~~Altopa~~ Sumnerdale

Agnes Louise Davison  
VS  
Emmett M. Davison

AGNES LOUISE DAVISON  
COMPLAINANT

VS.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

EMMETT MILTON DAVISON  
RESPONDENT

IN EQUITY, CASE NO. 3241

D E C R E E

It appearing to the Court that the above cause is inactive, upon consideration, it is ORDERED, ADJUDGED and DECREED by the Court that said cause be and hereby is transferred to the inactive docket of this Court, and

It further appearing to the Court that the execution for costs against the Defendant was returned by the Sheriff of this County, "No Property Found", it is therefore, ORDERED and DECREED by the Court that the costs be and hereby are now taxed against the State of Alabama pursuant of Section 119, (b), Title 34, 1955 Cumulative Pocket Parts, Code of Alabama.

This 5 day of June, 1962.

Robert M. Stone  
Judge Circuit Court, In Equity.