

2371

STATE OF ALABAMA,  
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Clyde Parker to appear within thirty days from the services of this writ in the Circuit Court, Equity Side, to be held for said County at the place of holding the same, then and there to answer the Bill of Complaint of Allie Parker.

WITNESS my hand this 12<sup>th</sup> day of Oct, 1949.

Allie J. Parker  
Register.

\* \* \* \* \*

ALLIE PARKER,  
Complainant,  
VS.  
CLYDE PARKER,  
Respondent.

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

Your Complainant, Allie Parker, presents this Bill of Complaint against Clyde Parker, and thereupon your Complainant represents and shows unto the Court and your Honor as follows:

1. Your Complainant is over the age of twenty-one years and a bona fide resident of Baldwin County, Alabama; Complainant's domicile is Baldwin County, Alabama, and she has been a bona fide resident of Baldwin County, Alabama for more than one year next preceeding the filing of this Bill of Complaint.
2. The Respondent, Clyde Parker, is over twenty-one years of age and is a bona fide resident of Baldwin County, Alabama.
3. Your Complainant and the said Respondent were lawfully married on or about April 4, 1925, in Baldwin County, Alabama, and lived together as husband and wife until about October 5, 1949.

4. Your Complainant further complains that on or about October 5, 1949, the Respondent did assault the Complainant with a knife and threatened her life; that the Respondent has on numerous occasions committed actual violence on the person of the Complainant attended with danger to her life and health; that from the conduct and manner of the Respondent toward the Complainant, the Complainant is reasonably convinced that the Respondent will commit actual violence on her person attended with danger to her life and health.

5. There was born to the said marriage two children, to-wit: Henry Hunter Parker, a son, now seventeen years of age, and Janice Parker, a daughter, now fourteen years of age. Your Complainant desires the custody and control of the said children, and your Complainant is a fit and proper person to have the custody and control of the said children.

6. Your Complainant does not have any funds or property with which to support herself and the said children, and she has no funds or money to pay her Solicitor for the services rendered by him in the prosecution of this suit.

#### PRAYER FOR PROCESS

Your Complainant prays that the Court will take jurisdiction of the cause made by this Bill of Complaint and that due notice thereof be given to the Respondent, Clyde Parker, in the form and manner prescribed by law, requiring him to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law, and the practice of this Honorable Court.


#### PRAYER FRO RELIEF

The premises considered your Complainant respectfully prays for the following relief:

1. That the Court will order a reference to be held before the Register in order that she may ascertain and report the amount of alimony pendente lite that should be allowed your Complainant
2. That the Bonds of Matrimony now existing between the Complainant and the said Respondent, Clyde Parker, be dissolved and that she be divorced from him.
3. That your Complainant be given and granted the permanent custody and control of the said children.

4. That alimony pendente lite, permanent alimony, and a reasonable Solicitor's fee for the Solicitor of the Complainant be fixed and allowed to be paid out of the estate of the said Clyde Parker and that all of the said sums be declared to be a lien on all of the property of the said Clyde Parker.

5. Your Complainant further prays for such other, further and general relief that she may be equitable entitled to the premises considered.

  
Solicitor for Complainant.

ALLIE PARKER

COMPLAINANT

VS.

CLYDE PARKER

RESPONDENT

Ø

Ø

Ø

Ø

Ø

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. 2371

Now comes the Respondent and for answer to the Complainant's complaint heretofore filed in this cause, says:

1.

The Respondent admits the allegations contained in paragraph one.

2.

The Respondent admits the allegations contained in paragraph two.

3.

The Respondent admits the allegations contained in paragraph three.

4.

The Respondent denies the allegations contained in paragraph four and demands strict proof thereof.

5.

The Respondent admits the allegations contained in paragraph five as to children, but denies that the Complainant is a fit and proper person to have their custody and control.

6.

The Respondent denies the allegations contained in paragraph six and demands strict proof of the same.

7.

The Respondent denies all allegations contained in the said bill of complaint not herein expressly admitted and demands strict proof of the same.

C. Le Roy Thompson

H. M. Hall

Solicitors for the Respondent.

ALLIE PARKER

COMPLAINANT

VS.

CLYDE PARKER

RESPONDENT

NO. 2371

FILED

NOV 14 1949

ALICE J. DUCK, Clerk

ALLIE PARKER,  
Complainant,  
VS.  
CLYDE PARKER,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
IN EQUITY. NO. 2371

DECREE.

Now comes the Complainant and moves in open court to dismiss this cause without prejudice, and the Respondent being present by his attorney consents and agrees in open court that this cause be dismissed without prejudice. And the same being understood and considered by the court, the court is of the opinion that motion should be granted. It is therefore ordered, adjudged and decreed by the court as follows:

1. This cause is hereby dismissed without prejudice.
2. The cost in this proceeding shall be taxed against the Complainant for which let execution issue.

Ordered, Adjudged, and Decreed this 3<sup>rd</sup> day of  
January, 1950.

Telfair G. Mashburn Jr.  
Judge.