

2832

Carine Parker
Complainant

vs

Mack Parker
Respondent

Circuit Court
Baldwin County
Alabama
In Equity

Comes Mack Parker, Respondent in the above titled cause and, for answer to the Bill of Complaint therein, says that he denies each and every allegation therein contained.

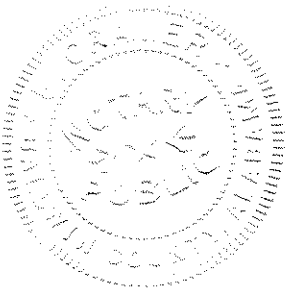
Respondent hereby waives the right to demand for formal commission to take testimony, the right to introduce evidence in his own behalf or to cross examined Complainants' witnesses and he agrees that the within cause may be submitted for final decree at any time without further notice to him upon Complainants' pleadings and evidence as noted by the Register.

Mack Parker

State of Alabama
Baldwin County

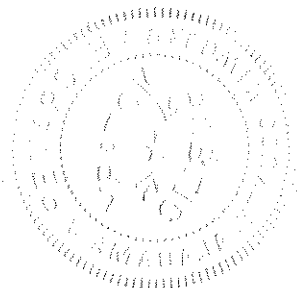
Personally appeared Mack Parker, known to me, and he acknowledged that he signed the foregoing answer and waiver VOLUNTARILY with full knowledge of the contents thereof.

Given under my hand and seal this 2nd day of July, 1952.



E. G. Gable
Notary Public, Baldwin County
Alabama

2832



RECORDED

FILED

JUL 8 1952

ALICE L. DICK, Register

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JUL 10 1952
JUL 10 1952

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Corine Parker
Complainant

vs

Mack Parker
Respondent

Circuit Court

Baldwin County

Alabama

In Equity

To The Honorable Telfair J. Mashburn, Jr., Judge of said Court
sitting in Equity;

Comes Corine Parker and exhibits this, her Bill of Complaint
against Mack Parker, and shows unto Your Honor as follows:

First: Complainant, whose age is 24 years, and Respondent, whose
age is 31 years, intermarried December 6th 1942 at Daphne, Alab-
ama.

Second: Prior to and subsequent to said marriage both parties
were residents of said Daphne, living together as husband and
wife subsequent to their marriage at and within said Daphne until
April 14th 1951 when Respondent did voluntarily abandon Complain-
ant and has continued said abandonment with total neglect of the
marital covenant on his part ever since. Complainant has remained
a resident of said Daphne to date hereof.

Third: To said marriage were born the following children, to wit;
Willie Lee Parker, now aged 8 years, Donald Eugene Parker, now
aged 7 years, Bill Mack Parker, now aged 5 years, Roy Thomas Parker,
now aged 4 years, Coary Corine Parker, now aged 3 years, and Jim
Henry Parker, now aged 17 months.

The premises considered, Complainant prays that said Mack Parker be,
by all due and appropriate process, made party defendant to the with-
in suit, that he be compelled to plead, answer or demur to the several
paragraphs hereof within the time prescribed by law and that he be com-
pelled to abide and obey all orders and decrees made in the premises.

Complainant further prays, upon a hearing of the within cause, that a
decree be ordered and entered granting her a divorce forever from said
Mack Parker, granting her the care and custody of all of said minor
children, granting such amounts for the support of said minor children
as may seem meet and proper and granting her such other, further and
different relief as, in Equity, may seem meet and proper.


Solicitor for Complainant

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RECORDED

FILED

JUL 3 1952

ALICE I. DUCK, Register

2832