

4482

CRAFT COMPANY, INCORPORATED
a corporation

Complainant

VS

CLARENCE V. EVANS, FLOYD E.
WOOLEY and SILVER KING RESTAU-
RANT, INC., a corporation, jointly and
severally

Respondents

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

DEMURRER OF RESPONDENT, CLARENCE V. EVANS

Comes now your respondent, Clarence V. Evans, and demurs to the bill of complaint as a whole, and to each aspect thereof, and assigns the following separate and several grounds of demurrer thereto, separately and severally:

1. Thereis no equity in the bill of complaint.
2. Complainant has a full, adequate and complete remedy at law.
3. The averments of the bill of complaint are vague, indefinite,

ambiguous and uncertain.

TONSMEIRE, HODNETTE & McFADDEN

By *William R. ...*
Solicitors for Respondent, Clarence V.
Evans

Filed
3-18-59

FILED

MAR 18 1959

ALICE L. DICK, CLERK
REGISTER

THE STATE OF ALABAMA, }
Baldwin County } No. _____ Circuit Court, In Equity.

CRAFT CO. INC., A CORPORATION Complainant---

Vs.

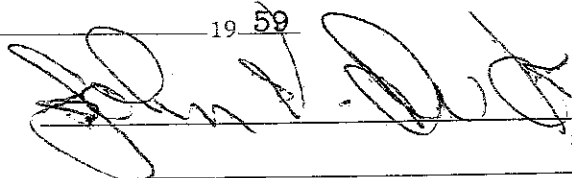
SILVERKING RESTAURANT INC. A CORP. and FLOYD E. WOOLEY Defendant....

Motion is hereby made for a Decree Pro Confesso against Floyd E. Wooley and Silverking

Restaurant, Inc. a Corporation. Defendant....

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendants...; and that said summons was duly served according to law, and that said Defendant S have failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 9th day of March 19 59


Solicitor.

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

CRAFT CO. INC. a corp.

Vs.

SILVER KING RESTAURANT, INC.

A Corp. & FLOYD E. WOOLEY

Motion for Decree Pro Confesso on
Personal Service

Filed _____ 19 _____

Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

CRAFT CO. INC, a corporation
 Complainant,
 Vs.
SILVERKING RESTURANT, INC, a
 corp. & FLOYD E. WOOLEY
 Respondent.

In the Circuit Court.
 In Equity No. _____.

DECREE PRO CONFESSO ON PERSONAL SERVICE

In this cause, it appears to the Register, that service was had on the Respondent 15 Floyd E. Wooley, and Silverking Restaurant Inc. a corporation

by the Sheriff of Baldwin County, on the 24th day of January 1959.

And it futher appears to the Register, that the said Floyd E. Wooley and Silverking Restaurant, Inc. a corporation

_____ the Respondent S, having to the date hereof, failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore, on motion of Cunningham, Wilkins and John V. Duck Solicitors for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be, and it hereby is, in all things taken as confessed against the said Floyd E. Wooley and Silverking Restaurent, Inc. a corporation.

This 15th day of March, 1959.

Alvin J. White
 Register.

No. _____

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

CRAFT CO. INC. a corp.

Complainant,

Vs.

SILVER KING RESTAURANT INC. A
CORP. & FLOYD E. WOOLEY
Respondent.

**DECREE PRO CONFESSO ON
PERSONAL SERVICE**

Issued this _____ day of _____
19_____

Register.

JIMMY DAVID FOWLER,
Complainant,

-vs-

DESSIE MAE FOWLER,
Respondent.

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

NO. _____

BALDWIN
TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF ~~MOBILE~~ COUNTY,
ALABAMA, SITTING IN EQUITY:

Comes the Complainant and shows unto Your Honors and unto the Honorable Judges of this Honorable Court as follows:

ONE

Complainant is the husband of the Respondent and they were married to each other on October 14, 1955 in Columbus, Mississippi. The Complainant is over the age of twentyOne years and the Respondent is nineteen years of age. Both the Complainant and the Respondent are bona-fide resident citizens of the State of Alabama and have been such for more than one year next preceding the filing of the bill of complaint herein. There is one minor child as issue of their marriage, Dessie Diane Fowler, age two years. Said child lives and resides with the Respondent and she is a fit and proper person to be granted her custody and control.

TWO

The Respondent voluntarily abandoned the bed and board of the Complainant for more than one year next preceding the filing of the bill of complaint herein.

PRAYER FOR PROCESS

Complainant prays that Your Honors will take jurisdiction of this cause, will make the said Dessie Mae Fowler, party-respondent hereto, and will cause her to appear, plead, answer or demur hereto within the time allowed by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

Complainant further prays that Your Honors will see fit to grant him an absolute divorce from the bonds of matrimony with the Respondent and Complainant further prays for such other, further and different relief as in equity he may be due, and as in duty bound he will ever pray, etc.

William J. Foy
SOLICITOR FOR COMPLAINANT.

Filed Jan. 15, 1959
Alice J. Luck, Registrar

4482
Bew Co

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FILED
JAN 15 1959
ALICE I. DUNK, CLERK
REGISTER