ANSWER AND WAIVER OF DEFENDANT Gill—Mobile

The State of Alabama, Escambia County

CIRCUIT COURT, IN EQUITY

At BayMinette, Alabama

Ruby Ray

vs.

W. L. Ray

Comes W. L. Ray the person named as defendant in this cause, and for answer to the bill herein denies each and every allegation therein, and demands strict proof of the same. Defendant also waives service by the Sheriff of subpoena on said bill, a copy of the interrogatories filed in the cause, notice of the filing of them, waives the ten days allowed by law to cross them, the right to cross them, and consents that testimony may be taken, and the cause be submitted to the Judge for final decree without notice to this defendant.

W. L. Ray, Defendant

THE STATE OF ALABAMA, ESCAMBIA COUNTY.

Before me Ines White a Notary Public the undersigned authority in and for said State and County, hereby certify that W. L. Ray whose name is signed to the foregoing answer to a certain Bill of Complaint filed on the 28th day of April, A.D. 1956, wherein Ruby Ray is complainant and W. L. Ray is defendant, and who is known to me to be the identical person named as defendant in the Bill of Complaint in this cause, acknowledged before me on this day that being informed of the allegations on the Bill of Complaint filed against the defendant in said cause, said defendant signed the answer hereto attached voluntarily on the day same bears date.

And I further certify that defendant signed the said answer in my presence.

Given under my hand and seal this 28th day of April, A.D. 1956

Ines White
NOTARY PUBLIC

THE STATE OF ALABAMA

Escambia County.

CIRCUIT COURT, IN EQUITY

vs.

Answer and Waiver of Defendant

VERIFIED BY AFFIDAVIT

Filed this 5th day of

May, 1956

Alice J. Hucks
Register.

Gill—Mobile

RUBY MILDRED RAY,	)	
Complainant,	)	IN THE CIRCUIT COURT OF
vs.	)	BALDWIN COUNTY, ALABAMA.
WILLIAM LEONARD RAY,	)	IN EQUITY. NO: 3758 .
Respondent.	)	

Comes now Telfair J. Mashburn Jr as Attorney for Ruby Mildred Ray, Complainant, and withdraws his appearance in this cause as attorney for said complainant and consents that the law firm of Horne & Webb of Atmore, Alabama may be substituted for him as attorneys for the said Ruby Mildred Ray, Complainant.

FILED
MAY 5 1956
JAMES L. BECK, Register

Telfair J. Mashburn Jr.
SOLICITOR FOR COMPLAINANT.

THE STATE OF ALABAMA
ESCAMBIA COUNTY.

Know all men by these presents, that whereas, the undersigned W. L. Ray, hereinafter called the husband, and Ruby Ray, hereinafter called the wife, have separated, and divorce proceedings have been commenced by the said Ruby Ray against the said W. L. Ray in the Circuit Court of Baldwin County, Alabama, and the parties desire to make some provision relative to the custody of the minor children born to the union, and the support and maintenance of the said children, the is, therefore, agreed as follows:

That the custody of the minor children of the parties shall be awarded as follows: The custody of Glenn Ray, a boy, aged eleven years, Peggy Ray, a girl aged Five years, and Robin Ray, a boy aged Five months, shall be in Ruby Ray during the school months of each Calendar year, and with the father, W. L. Ray, during the summer or vacation months each year. That each party shall have the right to visit with the children and have them visit with him or her while the other has the custody.

That during the time Ruby Ray has the children in her custody the said W. L. Ray shall pay to her for their support and maintenance the sum of One hundred twenty five dollars each calendar month, said moneys to be paid in two equal installments of Sixty two and 50/100 dollars each, on the 1st and 15th of each month, respectively.

The Circuit Court of Baldwin County, Alabama is humbly requested to take cognizance of this agreement and to award the custody of the minor children of the parties in accordance therewith, if same appears meet and just unto Your Honor, and to require that the said W. L. Ray, the respondent pay to the complainant, Ruby Ray, for the support and maintenance of the minor children of the parties the sum of One hundred twenty five dollars, each month they are in her custody.

IN WITNESS WHEREOF we have hereunto set our hands and seals in duplicate on this the 28th day of April, 1956.

W. L. Ray (SEAL)
HUSBAND

Ruby Ray (SEAL)
WIFE

Executed im the presence of:

Lynell Harrison

Inez White

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 3756

March TERM, 1956

BOOK 021 PAGE 38

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

WILLIAM LEONARD RAY

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

WILLIAM LEONARD RAY, Defendant

by

RUBY MILDRED RAY, Plaintiff

Witness my hand this 28th day of March 19 56

Alice J. Duke, Clerk

Perdido

No. 3758 Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

RUBY MILDRED RAY

Plaintiffs

vs.

WILLIAM ~~XXX~~) LEONARD RAY

Defendants

SUMMONS and COMPLAINT

Filed MARCH 28, 1956

ALICE J. DUCK, Clerk

TELFARR J. MASHBURN, JR.
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

March 28, 1956

Taylor Wilkins, Sheriff

I have executed this summons

this 4/7, 1956

by leaving a copy with

Wm. Leonard Ray

~~Sheriff claims~~ 26 ~~miles at~~

Ten Cents per mile Total $ 2.60

TAYLOR WILKINS, Sheriff

BY Dunn
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Clyde Dunn Deputy Sheriff

RUBY MILDRED RAY,	)	
Complainant,	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA.
WILLIAM LEONARD RAY,	)	IN EQUITY. NO. _____
Respondent.	)	

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

Your complainant, RUBY MILDRED RAY, respectfully represents and shows unto your Honor as follows:

1. That your complainant is over the age of twenty-one years and is a resident of said State and County, and has been a bona fide resident of said State for more than two years next preceding the filing of this bill of complaint; that WILLIAM LEONARD RAY is over the age of twenty-one years and is a resident citizen of said State and County, but is presently out of the State of Alabama, and his address is unknown to your complainant.

2. That your complainant and the respondent were lawfully married on or about, to-wit: the 3rd day of April, 1942

3. Your complainant further avers and alleges that said respondent has been guilty of adultery with one Violan Giddens.

4. That there was born of this marriage three children: Glenn Ray, age 10, Peggy Ray, age 5, and Robin Ray, age 2 months; that the respondent is not a fit and proper person to have the care custody and control of said minor children; and that your complainant is a fit and proper person to have the care, custody and control of said minor children.

5. That because of the age of her children, your complainant is unable to work outside the home, and that she is without funds with which to support herself and her minor children; that the respondent is a strong, able-bodied man, well able to work, who makes about $2.80 per hour as a construction worker; that he is financially able to support your complainant and their children; and that your complainant does not have sufficient money out of which to pay her Solicitor for prosecuting this suit and that she has employed

Telfair J. Mashburn, Jr., Attorney at Law, Bay Minette, Alabama, as her Solicitor to prosecute this suit.

PRAYER FOR PROCESS

THE PREMISES CONSIDERED, your Complainant makes the said WILLIAM LEONARD RAY a party respondent to this bill of complaint and, in order that she may have the relief hereinafter prayed for, may it please your Honor to cause the State's Writ of Subpoena to be issued, directed to the said WILLIAM LEONARD RAY, commanding him to plead, answer or demur to this bill of complaint within the time prescribed by law and the practice of this Honorable Court.

PRAYER FOR RELIEF

Your complainant further prays that, on a final hearing of this cause, your Honor will make and enter a decree divorcing your complainant from the respondent; granting to your complainant the care, custody and control of their minor children, with reasonable rights of visitation in the respondent; fixing a reasonable sum for the respondent to pay to your complainant for her support and maintenance and for the support and maintenance of their minor children; awarding to your complainant title to their household furniture and effects; and fixing a reasonable sum for the respondent to pay to your complainant's Solicitor for his services in this cause; and, if your complainant is mistaken in the relief for which she has asked, or to which she is entitled, then she prays for such other, further, different or general relief as, in equity and good conscience, she may be entitled to receive, and, as in duty bound, she will ever pray, etc.

Telfair J. Mashburn Jr.
SOLICITOR FOR COMPLAINANT.

The State of Alabama, BALDWIN County

IN CIRCUIT COURT, IN EQUITY

RUBY MILDRED RAY Complainant

vs.

WILLIAM LEONARD RAY Defendant

Oral examination before the ~~Register~~ Commissioner of the following witnesses:

RUBY MILDRED RAY

who reside in Alabama, said examination being conducted in Atmore Alabama, on this the 16th day of May, and there being present Commissioner and Witnesses

The said witness being first sworn to speak the truth, the whole truth and nothing but the truth, testified as follows:

TESTIMONY OF RUBY M. RAY:

My name is RUBY M. RAY. I am the Complainant in the above styled cause, and W. L. RAY is the Respondent. Both the Respondent and myself are over the age of twenty-one years and we are both bona fide resident citizens of Baldwin County, Alabama, and we have so resided for more than two years immediately preceding the filing of the bill of complaint in this cause. The Respondent and myself were married to each other in Mobile County, Alabama on the 3rd day of April, 1942. We have three children who were born to our marriage; these are GLENN RAY a boy, age 10; PEGGY RAY a girl, age 5; ROBIN RAY a boy, now about two months old. We have entered into an agreement concerning the custody and control and support of these children and in and by virtue of said agreement the custody is to be with me during the school months of each calendar year and with the Respondent during the summer and vacation months, and each of us are to have the right to visit the said children while they are in the custody of the other. It is also agreed between us that during the

No._____ Page_____

The State of Alabama,

_____ COUNTY

IN CIRCUIT COURT, IN EQUITY

_____

_____

vs. Complainant,

_____

_____

Defendant.

Deposition Taken Before Register on Oral Examination

Deposition of_____

for_____

Filed_____ day of_____, 19_____

FILED
DEC 16 1956
ALICE M. DUCK, Register

Published by order of the Court,_____

day_____, 19_____

_____

Register.

710—Gill Ptg. & Sta. Co., Mobile.

Law Offices of
Horne & Webb
Attorneys at Law
Atmore, Ala.

FRANK G. HORNE
DOUGLAS S. WEBB

December 5, 1956.

Mrs Alice J. Duck,
Clerk,
Circuit Court,
Baldwin County,
Bay Minette, Alabama.

Ruby Mildred Ray
vs.
William Leonard Ray.

Dear Mrs Duck:

Enclosed is a note of testimony, commission to take depositions, depostion taken before register or oral examination, three copies of a final divorce decree and copy of agreement of the parties to this divorce.

Please examine this file and if everything is in order submit this cause for final decree and bill us for the court costs. If we have omitted anything it would be appreciated if you would call our attention to such omission.

With kindest personal regards we remain;

Very truly yours,

HORNE & WEBB
BY:
Douglas S. Webb
DOUGLAS S. WEBB

DSW/am.

Law Offices of
Horne & Webb
Attorneys at Law
Atmore, Ala.

FRANK G. HORNE
DOUGLAS S. WEBB

May 4, 1956.

Mrs Alice J. Duck,
Clerk,
Circuit Court,
Baldwin County,
Bay Minette, Alabama.

Dear Mrs Duck:

Enclosed is the original complaint filed by Telfair Mashburn in the case of Ray vs Ray and our amendment to his bill. Also enclosed is an agreement by the parties and an answer and waiver of defendant.

I have forwarded a copy of this pleading to Telfair along with two copies of a withdrawal to be signed by him. He should bring this withdrawal to you and this should eradicate some of the confusion in this case.

As soon as you receive the withdrawal signed by Telfair I would appreciate you forwarding a commission to take the testimony to Inez White of this office.

With kindest per sonal regards I remain;

Very truly yours,

HORNE & WEBB
BY:
Douglas Webb
DOUGLAS S. WEBB

DSW/iw.

NOTE OF TESTIMONY

Gill—Mobile

THE STATE OF ALABAMA, BALDWIN COUNTY

CIRCUIT COURT IN EQUITY

No.

RUBY MILDRED RAY

Complainant

vs.

WILLIAM LEONARD RAY

Respondent

IN THIS CAUSE comes the complainant, Ruby Mildred Ray by her Solicitor and submits the same for Final Decree decree upon the Original Bill and exhibits thereto answer and waiver, agreement of the parties and upon the following testimony, to wit:

1. Testimony of Ruby Mildred Ray.

HORNE & WEBB
BY: Douglas S. Webb
Solicitor for Complainant.

I Hereby certify that the above note of testimony is correct:

This _____ day of _____, 19____

_____, Register

No._____ Page_____

The State of Alabama
ESCAMBIA COUNTY

CIRCUIT COURT, IN EQUITY

_____

_____

_____ Complainant

vs.

_____

_____ Respondent

NOTE OF TESTIMONY

Filed_____, 19____

FILED
DEC 6 1956
ALICE J. DUCK, Register

_____, Register

Recorded in_____Record

Vol._____ Page _____

_____, Register

COMMISSION TO TAKE DEPOSITIONS B.T.-500-11-54

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: INEZ WHITE

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine RUBY RAY

a witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

RUBY MILDRED RAY, Complainant

and WILLIAM LEONARD RAY, Respondent

on oath, to be by you administered, upon THEM to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 7th day of May, 1956

Register.

Commissioner's Fee, $

Witness' Fees, $

No. 3758

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

RUBY MILDRED RAY

Complainant

VS.

WILLIAM LEONARD RAY

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

INEZ WHITE

WITNESSES:

THE STATE OF ALABAMA
ESCAMBIA COUNTY.

Know all men by these presents, that whereas, the undersigned W. L. Ray, hereinafter called the husband, and Ruby Ray, hereinafter called the wife, have separated, and divorce proceedings have been commenced by the said Ruby Ray against the said W. L. Ray in the Circuit Court of Baldwin County, Alabama, and the parties desire to make some provision relative to the custody of the minor children born to the union, and the support and maintenance of the said children, that is, therefore, agreed as follows:

That the custody of the minor children of the parties shall be awarded as follows: The custody of Glenn Ray, a boy, aged eleven years, Peggy Ray, a girl aged Five years, and Robin Ray, a boy aged Five months, shall be in Ruby Ray during the school months of each Calendar year, and with the father, W. L. Ray, during the summer or vacation months each year. That each party shall have the right to visit with the children and have them visit with him or her while the other has the custody.

That during the time Ruby Ray has the children in her custody the said W. L. Ray shall pay to her for their support and maintenance the sum of One hundred twenty five dollars each calendar month, said moneys to be paid in two equal installments of Sixty two and 50/100 dollars each, on the 1st and 15th of each month, respectively.

The Circuit Court of Baldwin County, Alabama is humbly requested to take cognizance of this agreement and to award the custody of the minor children of the parties in accordance therewith, if same appears meet and just unto Your Honor, and to require that the said W. L. Ray, the respondent pay to the complainant, Ruby Ray, for the support and maintenance of the minor children of the parties the sum of One hundred twenty five dollars, each month they are in her custody.

IN WITNESS WHEREOF we have hereunto set our hands and seals in duplicate on this the 28th day of April, 1956.

W. L. Ray (SEAL)
HUSBAND

Ruby Ray (SEAL)
WIFE

Executed im the presence of:

Lynell Harrison

Ivey White

DIVORCE DECREE. (Code 1923 Form)

The State of Alabama, BALDWIN County

CIRCUIT COURT, IN EQUITY

RUBY MILDRED RAY Complainant

vs.

WILLIAM LEONARD RAY Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, as amended ~~Decree Pro Confesso~~ Answer and Waiver and agreement of the parties and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and that the said RUBY MILDRED RAY is forever divorced from the said WILLIAM LEONARD RAY

for and on account of CRUELTY

The Court takes cognizance of an agreement had between the parties which is filed in this cause insofar as to award the custody of the minor children of the parties, namely Glenn Ray, Peggy Ray and Robin Ray to the complainant during the school months of each calendar year; and to the respondent during the vacation months each year with full rights of visitation in each of the parties while the other has these children in his or her custody. The respondent is also required to pay Sixty Two and 50/100 ($62.50) Dollars on the 1st and also on the 15th day of each calendar month while the complainant has the custody of the said children; said amounts to be for support of said children.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that RUBY MILDRED RAY be, and she is hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that RUBY MILDRED RAY the Complainant pay the cost herein to be taxed, for which execution may issue.

This 6th day of December, 19 56

Herbert M. Steele

Judge Circuit Court, in Equity.

I, _____, Register of the Circuit Court for _____ County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office, and the cost has been paid.

Witness my hand and seal this the _____ day of _____, 19____

Register of Circuit Court, in Equity.

No._____ Page_____

The State of Alabama

_____COUNTY

IN CIRCUIT COURT,
IN EQUITY

_____

_____

_____ vs. Complainant,

_____

_____ Respondent.

DIVORCE DECREE

Filed:
Dec 6, 1956
Alice J. Deeck, Regr
By

RUBY MILDRED RAY, Complainant, vs. WILLIAM LEONARD RAY, Respondent.	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY. NO 3758.

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

Now comes your complainant, Ruby Mildred Ray, and amends her bill of complaint heretofore filed in this cause to read in words and figures as follows to-wit:

RUBY RAY, Complainant vs. W. L. RAY, Respondent.	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA SITTING IN EQUITY. NO: 3758.

TO HONORABLE HUBERT M. HALL, JUDGE, CIRCUIT COURT, BALDWIN COUNTY:

Your complainant, Ruby Ray, respectfully represents and shows unto your Honor as follows:

1. That your complainant is over the age of twenty-one years and is a resident of said State and County, and has been a bona-fide resident of said State for more than two years next preceding the filing of this her amended bill of complaint; that W. L. Ray is over the age of twenty-one years and is a resident citizen of said State and County.

2. That complainant and respondent were lawfully married on or about, to-wit; the 3rd day of April, 1942 in Mobile County, Ala.

3. That the respondent has been guilty of actual violence upon the person of complainant, attended with danger to her life or health, or from his conduct there is reasonable apprehension of such violence; that on to-wit; April 15, 1956, the respondent without provocation or just cause struck and beat the complainant about the face and body with his hands and fists; that this cruelty was of a grave nature and the complainant is afraid to try to live further with the respondent as his wife and cannot do so with any degree of comfort or safety.

4. That there was born of this marriage three children; Glenn Ray, age 10, Peggy Ray, age 5, and Robin Ray, age 2 months; that said complainant and respondent have entered into an agreement dated April 28th, 1956 concerning the custody, control and support of said

minor children and complainant humbly requests this Honorable Court to take cognizance of this agreement voluntarily entered into by the parties and make dispositions as to the said minor children in accordance with said agreement if the Court considers the same meet and proper.

WHEREFORE, your said oratrix prays that summons may issue to the said W. L. Ray commanding him to appear and demur, plead to or answer this Bill of Complaint as amended within the time allowed by law, or that the same will be taken as confessed; that the said W. L. Ray be made a party defendant hereto and that Your Honor will make a decree annulling said marriage, granting your oratrix a divorce and permitting her to marry again, and complainant further prays that Your Honor will award the custody of said minor children in accordance with the agreement entered into by the parties, said agreement being incorporated herein by reference, and that in accordance with the terms of said agreement will require the respondent to pay support money for said minor children and complainant prays for such other, further, different or general relief as, in equity and good conscience, she may be entitled to receive, and, as in duty bound, she will ever pray, etc., etc.

Dated this the 28th day of April, 1956.

HORNE & WEBB
BY:

Douglas Webb

SOLICITORS FOR COMPLAINANT.

RUBY MILDRED RAY, Complainant, vs. WILLIAM LEONARD RAY, Respondent.	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY. NO 3758.

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

Now comes your complainant, Ruby Mildred Ray, and amends her bill of complaint heretofore filed in this cause to read in words and figures as follows to-wit:

RUBY RAY, Complainant vs. W. L. RAY, Respondent.	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA SITTING IN EQUITY. NO: 3758.

TO HONORABLE HUBERT M. HALL, JUDGE, CIRCUIT COURT, BALDWIN COUNTY:

Your complainant, Ruby Ray, respectfully represents and shows unto your Honor as follows:

1. That your complainant is over the age of twenty-one years and is a resident of said State and County, and has been a bona-fide resident of said State for more than two years next preceding the filing of this her amended bill of complaint; that W. L. Ray is over the age of twenty-one years and is a resident citizen of said State and County.

2. That complainant and respondent were lawfully married on or about, to-wit; the 3rd day of April, 1942 in Mobile County, Ala.

3. That the respondent has been guilty of actual violence upon the person of complainant, attended with danger to her life or health, or from his conduct there is reasonable apprehension of such violence; that on to-wit; April 15, 1956, the respondent without provocation or just cause struck and beat the complainant about the face and body with his hands and fists; that this cruelty was of a grave nature and the complainant is afraid to try to live further with the respondent as his wife and cannot do so with any degree of comfort or safety.

4. That there was born of this marriage three children; Glenn Ray, age 10, Peggy Ray, age 5, and Robin Ray, age 2 months; that said complainant and respondent have entered into an agreement dated April 28th, 1956 concerning the custody, control and support of said

minor children and complainant humbly requests this Honorable Court to take cognizance of this agreement voluntarily entered into by the parties and make dispositions as to the said minor children in accordance with said agreement if the Court considers the same meet and proper.

WHEREFORE, your said oratrix prays that summons may issue to the said W. L. Ray commanding him to appear and demur, plead to or answer this Bill of Complaint as amended within the time allowed by law, or that the same will be taken as confessed; that the said W. L. Ray be made a party defendant hereto and that Your Honor will make a decree annulling said marriage, granting your oratrix a divorce and permitting her to marry again, and complainant further prays that Your Honor will award the custody of said minor children in accordance with the agreement entered into by the parties, said agreement being incorporated herein by reference, and that in accordance with the terms of said agreement will require the respondent to pay support money for said minor children and complainant prays for such other, further, different or general relief as, in equity and good conscience, she may be entitled to receive, and, as in duty bound, she will ever pray, etc., etc.

Dated this the 28th day of April, 1956.

HORNE & WEBB
BY:

Douglas J Webb

SOLICITORS FOR COMPLAINANT.