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JOHN P. BEEBE  
ATTORNEY AT LAW  
~~ROBERTSDALE, ALABAMA~~  
Robertsdale, Ala.

August 13th, 1959.

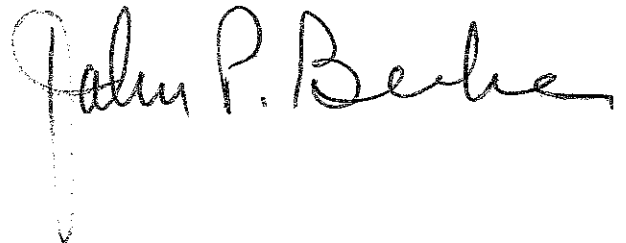
Mrs. Alice J. Duck,  
Register in Chancery,  
Bay Minette, Alabama.

Dear Mrs. Duck:

I enclose original and copy of bill of complaint in the matter of Otis Parnell vs. Dovie Parnell, with a request that the bill of complaint be filed and that summons be issued and served on the defendant, who is now living in Rabun, Baldwin County, Alabama, with a family by the name of Lambert or Lamberth.

Thanking you, I am

Sincerely yours,



The State of Alabama,  
Baldwin County.

Circuit Court, Baldwin County

No. ....

..... TERM, 19....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commaned to Summon \_\_\_\_\_  
Dovie Parnell

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 \_\_\_\_\_  
Dovie Parnell, Defendant

by \_\_\_\_\_ Otis Parnell \_\_\_\_\_  
\_\_\_\_\_, Plaintiff

Witness my hand this 14th day of August 19 59

*Archie Smith*, Clerk

OTIS PARNELL,  
Complainant,

vs

DOVIE PARNELL,  
Defendant.

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) IN EQUITY

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

Comes your complainant, Otis Parnell, and humbly complaining against Dovie Parnell, the defendant, and respectfully shows unto your Honor:

FIRST

That your complainant is over the age of twenty-one years and is a resident of Baldwin County, Alabama, where he has resided all of his life.

SECOND

That the defendant is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

THIRD

That your complainant and the defendant were married in Lucedale, Mississippi, on June 21st, 1952, and lived together as husband and wife until on to-wit: the latter part of June, 1959, when they separated.

FOURTH

That the said defendant has committed acts of adultery since their marriage with one J. C. Hadley at various times and places, the last act of which was committed the latter part of June, 1959, while your complainant was working in Washington County, Alabama, which said acts were not condoned by your complainant.

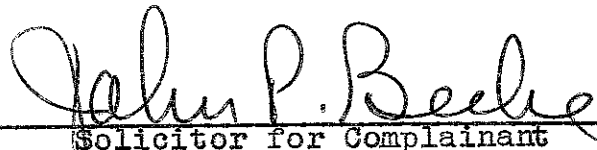
FIFTH

That there was born to the defendant after her marriage to your complainant the following children, namely: Elbert Parnell, born January 20th, 1953; Shirley Parnell, born September 26th, 1955;

Celia Ann Parnell, born October 12th, 1957; and Baby Parnell, born November 23rd, 1958; that during the time your complainant was married to the said defendant the said defendant committed further acts of adultery with various persons, at various times and at various places; that because of her lewd, lustful and unchaste character the said defendant is an unfit person to have the care and control of the said children.

WHEREFORE, your complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint and make the said Dovie Parnell party defendant hereto and by appropriate process require her 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.

Complainant further prays that upon the final hearing of this cause this Honorable Court will make and enter a decree forever dissolving the bonds of matrimony existing between this complainant and the said defendant, and will by said decree place the said children: Elbert Parnell, Shirley Parnell, Celia Ann Parnell and Baby Parnell, in the care and custody of your complainant, and the complainant prays for such other, further or different relief as in equity and good conscience he shall be entitled to receive in the premises.

  
Solicitor for Complainant