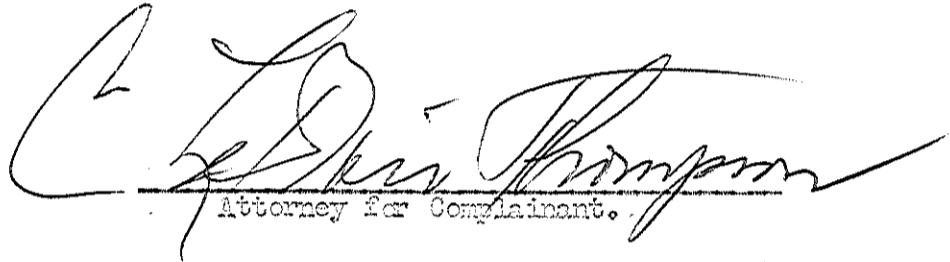


IRMA PARKER DAVIS  
COMPLAINANT  
VS  
CHARLES A. DAVIS  
RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY.  
CASE NO. 3852

Comes the Complainant by her Attorney of Record and move to dismiss  
the complaint filed in said cause.

  
Attorney for Complainant.

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons CHARLES A. DAVIS, to appear and plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by IRMA PARKER DAVIS, as Complainant and against CHARLES A. DAVIS, as Respondent.

WITNESS my hand this the 17<sup>th</sup> day of Aug., 1956.

Alice J. Duck  
Register.

IRMA PARKER DAVIS  
COMPLAINANT

VS

CHARLES A. DAVIS  
RESPONDENT

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

CASE NO. 3852

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

Your Complainant, Irma Parker Davis, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 21 and is a resident of Baldwin County, Alabama, and has been more than two years next preceeding, the Respondent is over the age of 21 and is presently a resident of Biloxi, Mississippi, residing at 126D Pass Road, Biloxi, Mississippi.

2.

That your Complainant and the Respondent married in Lucedale, Mississippi on December 8, 1952 and lived together as husband and wife until July 1, 1956.

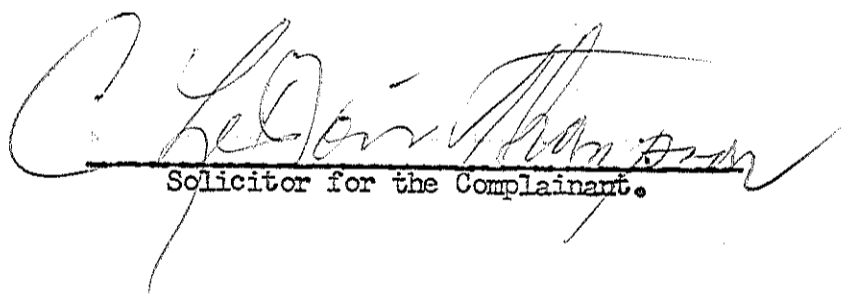
3.

That on July 1, 1956, and on several occasions prior thereto the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health. The conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with him he would carry out his threats and do actual violence to her person, which would necessarily endanger her life and health.

There was born as fruits of this marriage between the Complainant and the Respondent one child, Charles Wayne Davis, age about four years, and there is no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said Charles A. Davis, party Respondent to this bill of complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a hearing hereof your Honor will enter an order and decree granting to both parties an absolute decree of divorce forever barring the bonds of matrimony existing between the Complainant and the Respondent and that a decree be made awarding the Complainant, who now has the care, custody and control of the infant child, Charles Wayne Davis, age about four years, the care, custody and control of said child pending further orders of this Court; and your Complainant further prays that your Honor will determine the sum of \$40.00 per month payable on the part of your Complainant as a reasonable amount for the support and maintenance of said minor child; your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

  
Solicitor for the Complainant.

3852

IRMA PARKER DAVIS

COMPLAINANT

VS

CHARLES A. DAVIS

RESPONDENT

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SUMMONS AND COMPLAINT

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FILED  
AUG 17 1956  
ANGEL J. DUCK, Register

From the law offices of  
C. LeNoir Thompson  
Bay Minette, Alabama