

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

No.

4748

Circuit Court, Baldwin County

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon CHARLES EVANS MILLSTEAD

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

CHARLES EVANS MILLSTEAD

-----, Defendant

by ALLIE V. ODON, as mother and next friend of DONNIE FAYE DONELSON

-----, Plaintiff

Witness my hand this 27 day of October 1959

Alise J. Duck, Clerk

No. 1718

Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

~~ALLIE Y. GORM as mother and~~
~~next friend of DORIS FAYE DOWNSON~~
Plaintiffs

vs.

~~CHARLES EVANS WILLOTTAD~~

Defendants

Summons and Complaint

Filed October 27 19 59

Allen J. Cook Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

_____ 19_____

_____, Sheriff

I have executed this summons

this _____ 19_____

by leaving a copy with

Sheriff

Deputy Sheriff

ALLIE V. ODOM as mother and next friend of DONNIE FAYE DONELSON	I	IN THE CIRCUIT COURT
	I	OF BALDWIN COUNTY,
Complainant	I	ALABAMA
VS	I	IN EQUITY
CHARLES EVANS MILLSTEAD	I	NO. _____
Respondent	I	

TO THE HONORABLE HUBERT HALL, JUDGE OF SAID COURT:

Comes now the Complainant in the above styled cause and shows unto the Court that she is the mother of Donnie Faye Donelson, a daughter fifteen years of age, and that your complainant and the daughter named herein are residents of Escambia County, Alabama.

T W O

The respondent named herein is believed to be nineteen years of age and your complainant is without sufficient knowledge as to the residence of this respondent but states that she has been informed that she is presently residing in Baldwin County at various addresses. One address is believed to be in the community of Lottie in Baldwin County and the other address is believed to be in Fairhope, Baldwin County.

T H R E E

Your respondent is informed and believes and from such information and belief states that the respondent and the named daughter participated in a marital ceremony in Baldwin County, Alabama, on, to-wit, September 7, 1959.

F O U R

At the time of the purported marriage the named complainant's daughter was fourteen years of age and that your complainant, the mother of said child, did not give

her consent to the marriage and that the respondent, Charles Evans Millstead, did forge or induce another party to forge the signature of your complainant on a consent certificate to obtain the marriage license. The grand jury of this County returned an indictment to which the respondent plead guilty.

F I V E

On, to-wit, October ____, 1959, the complainant's daughter left the residence that she was residing in in Escambia County and was later seen or known to be with the respondent named herein and that at the time of filing this bill of complaint states on information and belief that the respondent is living with or in the company with the named daughter, and the complainant does not have knowledge as to the whereabouts of her daughter but it is believed the daughter to be in Baldwin County, Alabama.

S I X

On, to-wit, the 21st day of October, 1959, the Honorable A. H. Elliott, Judge of the Circuit Court of Escambia County, granted an annulment annulling the marital procedure that might have been performed effecting the parties.

WHEREFORE, your Petitioner prays that this cause be set down as soon as possible in this Honorable Court after due process be had on the named respondent and his father, Willie Millstead, forthwith ordering the respondent to appear at said time and place as directed by this Court and at such time produce Donnie Faye Donelson and after hearing the evidence to substantiate the allegations of this bill to order, adjudge and decree that the respondent

deliver the said daughter to the complainant and enjoin the respondent from interfering, molesting or being with Donnie Faye Donelson at any time and the complainant prays that this Court grant her any fit and proper relief that she might be entitled to and the complainant prays to do equity in this cause.

Allie V. Odom

STATE OF ALABAMA :

COUNTY OF MOBILE :

Personally appeared before me, the undersigned authority in and for said State and County, Allie V. Odom, who being by me first duly sworn, doth depose and say that she is the complainant in the foregoing bill of complaint, that she has read the foregoing complaint and known that the facts contained therein are true and correct.

Allie V. Odom

Subscribed and sworn to before me
on this 27th day of October, 1959.

Richard Wells
Notary Public, Mobile County, Alabama

M. A. Marsal
M. A. MARSAL, Solicitor for Complainant

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No. 1718

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon CHARLES STAN HILLSTAD

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

----- CHARLES STAN HILLSTAD -----, Defendant

by ALLIE F. COOK, as mother and next friend of DENNIS PAUL BOWLSON

-----, Plaintiff

Witness my hand this 21 day of October 1959

Allie F. Cook, Clerk

No. 5748

Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

ALLIE V. ODOM as mother and
next friend of DOMITE FAYE DOMELSON
Plaintiffs

vs.

CHARLES EVANS HILLSTAD

Defendants

Summons and Complaint

Filed October 27 19 59

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19_____

_____, Sheriff

I have executed this summons

this _____ 19_____

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff

ALLIE V. ODOM as mother and next friend of DONNIE FAYE DONELSON	I	IN THE CIRCUIT COURT
	I	OF BALDWIN COUNTY,
Complainant	I	ALABAMA
VS	I	IN EQUITY
CHARLES EVANS MILLSTEAD	I	NO. _____
Respondent	I	

TO THE HONORABLE HUBERT HALL, JUDGE OF SAID COURT:

Comes now the Complainant in the above styled cause and shows unto the Court that she is the mother of Donnie Faye Donelson, a daughter fifteen years of age, and that your complainant and the daughter named herein are residents of Escambia County, Alabama.

T W O

The respondent named herein is believed to be nineteen years of age and your complainant is without sufficient knowledge as to the residence of this respondent but states that she has been informed that she is presently residing in Baldwin County at various addresses. One address is believed to be in the community of Lottie in Baldwin County and the other address is believed to be in Fairhope, Baldwin County.

T H R E E

Your respondent is informed and believes and from such information and belief states that the respondent and the named daughter participated in a marital ceremony in Baldwin County, Alabama, on, to-wit, September 7, 1959.

F O U R

At the time of the purported marriage the named complainant's daughter was fourteen years of age and that your complainant, the mother of said child, did not give

her consent to the marriage and that the respondent, Charles Evans Millstead, did forge or induce another party to forge the signature of your complainant on a consent certificate to obtain the marriage license. The grand jury of this County returned an indictment to which the respondent plead guilty.

F I V E

On, to-wit, October ____, 1959, the complainant's daughter left the residence that she was residing in in Escambia County and was later seen or known to be with the respondent named herein and that at the time of filing this bill of complaint states on information and belief that the respondent is living with or in the company with the named daughter, and the complainant does not have knowledge as to the whereabouts of her daughter but it is believed the daughter to be in Baldwin County, Alabama.

S I X

On, to-wit, the 21st day of October, 1959, the Honorable A. H. Elliott, Judge of the Circuit Court of Escambia County, granted an annulment annulling the marital procedure that might have been performed effecting the parties.

WHEREFORE, your Petitioner prays that this cause be set down as soon as possible in this Honorable Court after due process be had on the named respondent and his father, Willie Millstead, forthwith ordering the respondent to appear at said time and place as directed by this Court and at such time produce Donnie Faye Donelson and after hearing the evidence to substantiate the allegations of this bill to order, adjudge and decree that the respondent

deliver the said daughter to the complainant and enjoin the respondent from interfering, molesting or being with Donnie Faye Donelson at any time and the complainant prays that this Court grant her any fit and proper relief that she might be entitled to and the complainant prays to do equity in this cause.

Allie V. Odom

STATE OF ALABAMA :

COUNTY OF MOBILE :

Personally appeared before me, the undersigned authority in and for said State and County, Allie V. Odom, who being by me first duly sworn, doth depose and say that she is the complainant in the foregoing bill of complaint, that she has read the foregoing complaint and known that the facts contained therein are true and correct.

Allie V. Odom

Subscribed and sworn to before me
on this 27th day of October, 1959.

Richard Wells
Notary Public, Mobile County, Alabama

M. A. Marsal
M. A. MARSAL, Solicitor for Complainant

ALLIE V. ODOM as mother and	⌘	IN THE CIRCUIT COURT
next friend of DONNIE FAYE		
DONELSON	⌘	OF BALDWIN COUNTY,
Complainant	⌘	ALABAMA
VS	⌘	IN EQUITY
CHARLES EVANS MILLSTEAD	⌘	NO. _____
Respondent	⌘	

TO THE HONORABLE HUBERT HALL, JUDGE OF SAID COURT:

Comes now the Complainant in the above styled cause and shows unto the Court that she is the mother of Donnie Faye Donelson, a daughter fifteen years of age, and that your complainant and the daughter named herein are residents of Escambia County, Alabama.

T W O

The respondent named herein is believed to be nineteen years of age and your complainant is without sufficient knowledge as to the residence of this respondent but states that she has been informed that she is presently residing in Baldwin County at various addresses. One address is believed to be in the community of Lottie in Baldwin County and the other address is believed to be in Fairhope, Baldwin County.

T H R E E

Your respondent is informed and believes and from such information and belief states that the respondent and the named daughter participated in a marital ceremony in Baldwin County, Alabama, on, to-wit, September 7, 1959.

F O U R

At the time of the purported marriage the named complainant's daughter was fourteen years of age and that your complainant, the mother of said child, did not give

her consent to the marriage and that the respondent, Charles Evans Millstead, did forge or induce another party to forge the signature of your complainant on a consent certificate to obtain the marriage license. The grand jury of this County returned an indictment to which the respondent plead guilty.

F I V E

On, to-wit, October ____, 1959, the complainant's daughter left the residence that she was residing in in Escambia County and was later seen or known to be with the respondent named herein and that at the time of filing this bill of complaint states on information and belief that the respondent is living with or in the company with the named daughter, and the complainant does not have knowledge as to the whereabouts of her daughter but it is believed the daughter to be in Baldwin County, Alabama.

S I X

On, to-wit, the 21st day of October, 1959, the Honorable A. H. Elliott, Judge of the Circuit Court of Escambia County, granted an annulment annulling the marital procedure that might have been performed effecting the parties.

WHEREFORE, your Petitioner prays that this cause be set down as soon as possible in this Honorable Court after due process be had on the named respondent and his father, Willie Millstead, forthwith ordering the respondent to appear at said time and place as directed by this Court and at such time produce Donnie Faye Donelson and after hearing the evidence to substantiate the allegations of this bill to order, adjudge and decree that the respondent

deliver the said daughter to the complainant and enjoin the respondent from interfering, molesting or being with Donnie Faye Donelson at any time and the complainant prays that this Court grant her any fit and proper relief that she might be entitled to and the complainant prays to do equity in this cause.

Allie V. Odom

STATE OF ALABAMA :

COUNTY OF MOBILE :

Personally appeared before me, the undersigned authority in and for said State and County, Allie V. Odom, who being by me first duly sworn, doth depose and say that she is the complainant in the foregoing bill of complaint, that she has read the foregoing complaint and known that the facts contained therein are true and correct.

Allie V. Odom

Subscribed and sworn to before me
on this 27th day of October, 1959.

Rachel Wells
Notary Public, Mobile County, Alabama

M. A. Marsal
M. A. MARSAL, Solicitor for Complainant

FILED

OCT 28 1959

ANICE J. DUCK, Register

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No. 4748

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon CHARLES EVANS MILLSTEAD

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

CHARLES EVANS MILLSTEAD, Defendant

by ALLIE V. ODOM, as mother and next friend of DONNIE FAYE DONELSON

-----, Plaintiff

Witness my hand this 27 day of October 1959

Alice J. Duck, Clerk

The State of Alabama
Baldwin County

CIRCUIT COURT

ALLIE V. ODOM as mother and
next friend of DONNIE FAYE DONELSON
Plaintiffs

vs.

CHARLES EVANS MILLSTEAD

Defendants

Summons and Complaint

Filed October 27 19 59

Alice J. Duck Clerk

FILED
OCT 28 1959

ALICE J. DUCK, Register

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

10/28 19 59

Sheriff

I have executed this summons

this Oct 29 19 59

by leaving a copy with

Sheriff claims 40 miles at

Ten Cents per mile Total \$ 4.00

TAYLOR WILKINS, Sheriff

BY T. A. Talbert
DEPUTY SHERIFF

Taylor Wilkins Sheriff

W. A. Talbert Deputy Sheriff

Lettie, Ala

ALLIE V. ODOM as mother and
next friend of DONNIE FAYE
DONELSON

COMPLAINANT

VS

CHARLES EVANS MILLSTEAD

RESPONDENT

)
)
)
)
)
)
)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 4748

Comes now the Respondent in the above styled cause and demurs to the
Plaintiff's Bill of Complaint and for grounds therefor says:

1.

There is no equity in the bill of complaint.

FILED

NOV 25 1959

ALICE J. DUCK, Register

Wilters & Brantley

BY:

Walter M. Brantley
Solicitor for the Respondent

4748

ALLIE V. ODOM as mother and
next friend of DONNIE FAYE
DONELSON

COMPLAINANT

VS

CHARLES EVANS MILLSTEAD

RESPONDENT

DEMURRERS

FILED

NOV 25 1959

ALICE J. DUCK, Register