

STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )

IN THE RICHLAND COUNTY COURT

KATHLEEN E. PARNELL,  
Plaintiff,

-vs-

ARCHIE W. PARNELL,  
Defendant.

S U M M O N S

FILED  
MAR 12 3 30 PM '73  
JOHN R. I. MAJOR  
C. C. C. P. & G. S.

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, of which a copy is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the subscriber at his office, 1501 Washington Street, Columbia, South Carolina 29201, within twenty (20) days after the service thereof, exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in the Complaint.

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KERMIT S. KING  
1501 Washington Street  
Columbia, South Carolina

ATTORNEY FOR THE PLAINTIFF

Columbia, South Carolina

31<sup>st</sup> day of October, 1973.



STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

IN THE RICHLAND COUNTY COURT

KATHLEEN E. PARNELL,  
Plaintiff,

-vs-

ARCHIE W. PARNELL,  
Defendant.

C O M P L A I N T

FILED  
NOV 12 3 30 PM '73  
JOHN H. T. MAJORS  
C. C. C. P. & G.

The Plaintiff above-named, complaining of and against the Defendant herein, alleges:

1. That the Plaintiff and the Defendant are both citizens and residents of the State of South Carolina and the County of Richland and have been citizens and residents of the said State and County for more than one (1) year next preceding the commencement of this action.
2. That the Plaintiff and the Defendant were lawfully married at Sumter, South Carolina, on January 27, 1971; and that of this marriage, no children have been born and none are expected.
3. That, following the marriage of the parties, the relationship of the parties deteriorated by reason of certain difficulties and differences caused by the Defendant's unwarranted accusations against the Plaintiff, to the extent that, on October 21, 1973, at about 2:00 o'clock A.M., the Defendant, while he and the Plaintiff were at the apartment of some friends, did force his way back into the said apartment by breaking out the glass door with a tire iron, after being locked out for the protection of the Plaintiff and did, by force, after making further accusations which the Plaintiff repeatedly denied, did repeatedly strike the Plaintiff, with such force as to cause her acute physical injury; and that the Plaintiff later the same night was again accosted and beaten by the Defendant; and that, by reason of the foregoing, the Plaintiff is fearful for her safety and will not live with the Defendant again as his wife, in that the acts of

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4. That the Plaintiff is informed and believes that she is entitled to an absolute divorce on the ground of physical cruelty.

5. That the Plaintiff does not seek any alimony; but that the Plaintiff does seek attorney's fees, in that the Defendant brought on the difficulty and is able to pay attorney's fees.

6. That, in the event the Court should grant a divorce, the Plaintiff is informed and believes that this Court should authorize her to resume the use of her maiden name, Hudnall.

7. That the Plaintiff is informed and believes that she is entitled to one-half (1/2) of a joint savings account at the Security Federal Savings and Loan Company, said one-half (1/2) equalling approximately One Thousand (\$1,000.00) Dollars.

8. That the Plaintiff is informed and believes that, unless the Defendant is made subject to a Restraining Order, the Defendant will attempt to contact her and harm her and that, accordingly, the Plaintiff seeks to have the Court issue a Temporary Restraining Order to require the Defendant to refrain from contacting her in person or by telephone or otherwise and to refrain from assaulting her, molesting her, harassing her, harming her, threatening her or otherwise interfering with her in any way whatsoever.

9. That the Plaintiff did not cause, justify or provoke the conduct of the Defendant about which complaint is made herein; and that there is no collusion between the parties with respect to this action to obtain a divorce.

WHEREFORE, the Plaintiff prays:

(a) That this Court issue a Temporary Restraining Order as aforesaid;

(b) That this Court grant leave to the Defendant to apply for a hearing at which he may show cause, if any he can, why the Temporary Restraining Order should not remain in force and effect during the pendency of this action;

(c) That, upon inquiring into the matter on the merits, this Court issue its Decree to grant to the Plaintiff an absolute divorce and to restore to the Plaintiff the use of her maiden name

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(d) That this Court, by its Decree, grant the Plaintiff attorney's fees;

(e) That this Court, by its Decree, grant to the Plaintiff one-half (1/2) of the amount held in a joint savings account at Security Federal Savings and Loan Company;

(f) That this Court grant such other and further relief as to the Court may seem just and proper.



KERMIT S. KING  
1501 Washington Street  
Columbia, South Carolina 29201

ATTORNEY FOR THE PLAINTIFF

Columbia, South Carolina

31<sup>st</sup> day of October, 1973.

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STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )

VERIFICATION

PERSONALLY appeared before me Kathleen E.

Hudnall, who being first duly sworn, deposes and says:

That she is the Plaintiff in the foregoing  
action; that she has read the foregoing Summons + Complaint  
and knows the allegations contained therein to be true except  
as to those allegations which may be alleged to be upon infor-  
mation and belief, and as to those, \_\_\_\_\_ she believes them  
to be true.

Kathleen E. Hudnall Parnell  
Kathleen E. Hudnall Parnell

SWORN and subscribed to before me

this 12<sup>th</sup> day of November, 1973.

Susan S. Kaege  
Notary Public for South Carolina

My commission expires 3-21-83.

STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )

IN THE RICHLAND COUNTY COURT

87120

KATHLEEN E. PARNELL,  
Plaintiff,

-VS-

ARCHIE W. PARNELL,  
Defendant.

AFFIDAVIT OF DEFAULT

MAR 15 2 34 PM '87

FILED

PERSONALLY appeared before me the undersigned Attorney,  
who, first being duly sworn, deposes and says that he is the attor-  
ney for the Plaintiff in the above-entitled action; that a Summons  
and Complaint were heretofore served upon the Defendant in this  
action, and that more than twenty (20) days have elapsed, exclu-  
sive of the day of service; but the Defendant has filed no Answer,



STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )

IN THE RICHLAND COUNTY COURT

KATHLEEN E. PARNELL,  
Plaintiff,  
-vs-

ARCHIE W. PARNELL,  
Defendant.

AFFIDAVIT OF SERVICE

Vickie T. Howe

being duly sworn, says: That she served the Summons and Complaint in this action on the Defendant, Archie W. Parnell, be delivering to him personally and leaving with him one copy each of same at Columbia, South Carolina, on the 9th day of November, 1973. That he knows the person so served to be the one mentioned and described in the Summons as the Defendant. That the deponent is not a party to this action.

SWORN to before me this 9th

day of November, 1973.

Susan S. Kape (L.S.)  
Notary Public for South Carolina

My Commission Expires: 2-21-83

Vickie T. Howe (SEAL)



STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

BOOK 158 PAGE 393  
IN THE RICHLAND COUNTY COURT

87120

KATHLEEN E. PARNELL ✓  
Plaintiff,

-vs-

ARCHIE W. PARNELL, ✓  
Defendant.

TEMPORARY RESTRAINING ORDER AND  
RULE TO SHOW CAUSE

FILED  
MAY 12 3 30 PM '73  
JOHN H. I. MAJOR  
C.C.C.P. & G.S.

Upon reading the verified Complaint, a copy of which is attached hereto, and it appearing therefrom that the Plaintiff is entitled to have this Court issue a Temporary Restraining Order on motion of Kermit S. King, counsel for the Plaintiff,

IT IS ORDERED that you, Archie W. Parnell, be, and hereby are, restrained from contacting the Plaintiff, Kathleen E. Parnell in person or by telephone or otherwise and from assaulting, molesting, harrassing, harming, threatening or otherwise interfering with her in any way whatsoever at the home of her parents, at her place of employment or any other place, and from withdrawing from Security Federal Savings and Loan the funds in the joint savings account of the parties and/or from transferring, secreting, or disposing of in any way whatsoever the said funds.

AND IT IS FURTHER ORDERED that any and all law enforcement officers of the State of South Carolina and any and every political subdivision thereof be, and hereby are, authorized and directed to arrest the Defendant and incarcerate him in any jail in the event that such officers find the Defendant in violation of this Temporary Restraining Order, said Defendant to be held without bond and the Undersigned to be notified of his incarceration in order that a hearing may be scheduled as to why the Defendant should not be punished for contempt of court.

AND IT IS FURTHER ORDERED that the Defendant, Archie W. Parnell, be, and hereby is, granted leave to apply to this Court to fix a time for a hearing at which the said Defendant may show cause, if any he can, why this Temporary Restraining



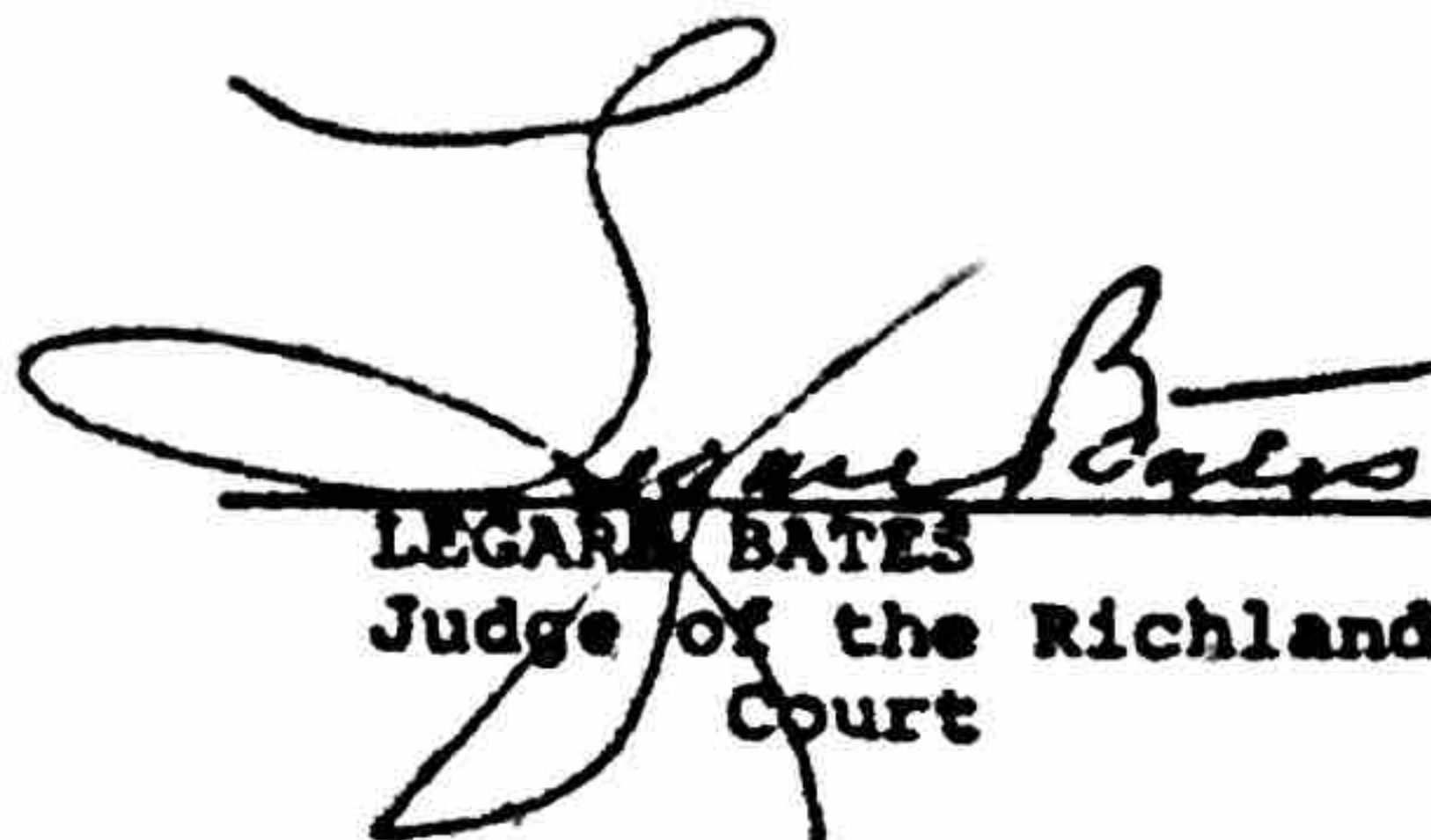
87120

BOOK 158 PAGE 334

Order should not remain of force and effect during the pendency of this action.

AND IT IS FURTHER ORDERED that, in the event the Defendant so applies and such hearing is scheduled, the Defendant shall serve upon the attorney for the Plaintiff at least twenty-four (24) hours in advance of the time fixed for a hearing as aforesaid, return statement of his position as to why the Temporary Restraining Order should not remain of force and effect.

AND IT IS SO ORDERED.

  
LEGARE BATES  
Judge of the Richland County  
Court

Columbia, South Carolina

1 day of

Nov.

1973.





# National Conference of Bar Examiners

William H. Morris, Director

Suite 1025  
333 North Michigan Avenue  
Chicago, Illinois 60601  
Area Code (312) 641-0963

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June 27, 1977

Clerk  
Court of Common Pleas  
for Richland County  
Columbia, South Carolina 29201

#87120

Dear Sir:

Our Conference has been asked to prepare the required character report on ARCHIE WILLIAM PARNELL, JR., (nickname Archer Parnell '71-'74), a member of the bar of South Carolina who is applying for admission to the bar of the District of Columbia Court of Appeals.

Mr. Parnell indicates that he was involved in a divorce action brought by his wife Kathleen E. Parnell against him in your court on March 15, 1974. We wish to verify this action, learn the grounds on which it was brought, and the date of the decree. Was any alimony or child support awarded, and if so, have these obligations been fulfilled?

Thank you for your assistance.

Sincerely,

William H. Morris  
Director

WHM/kar



**JOHN R. T. MAJOR**



**RICHLAND COUNTY COURT HOUSE  
SUMTER & WASHINGTON STREETS  
TELEPHONE 799-9213**

**MAILING ADDRESS:  
POST OFFICE BOX 1781  
COLUMBIA, S. C. 29202**

**COLUMBIA, SOUTH CAROLINA**

**July 1, 1977**

**To: Mr. William H. Morris, Director**

**From: Edna V. Owens, Assistant Clerk of Court**

**In Re: Kathleen E. Parnell vs. Archie W. Parnell**

**The fee for the copies of the above captioned case is Two Dollars and 75/100 (\$2.75). Please make check payable to John R. T. Major, Clerk of Court and mail to P. O. Box 1781, Columbia, S. C., 29202.**

**Thank you.**

*Edna V. Owens*  
Assistant Clerk of Court



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STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )

IN THE RICHLAND COUNTY COURT

87120

KATHLEEN E. PARNELL, )  
Plaintiff, )

-vs-

ARCHIE W. PARNELL, )  
Defendant. )

D E C R E E

Signed, Sealed, Entered and

Enrolled this 15 day of

March A.D. 1974

John R. T. Meyer  
C.C.P. & C.

Mar 15 2 24 PM

FILED

This matter came before me for hearing on the 15th day of March, 1974, at which time the Plaintiff and her attorney, Kermit S. King, of Columbia, South Carolina, and her corroborating witness were present.

The Plaintiff's attorney called the attention of the Court to the original Summons and Complaint, a copy of which was personally served on the Defendant herein on November 9, 1973, as will more fully appear by the Affidavit of Service endorsed on the back of the original Summons and Complaint, which was filed in the Office of the Clerk of Court for Richland County on November 12, 1973. The Plaintiff's attorney also called the attention of the Court to the fact that more than twenty (20) days elapsed after the service of the suit papers on the Defendant and that he has not filed any Answer, Demurrer, Notice of Appearance or other pleadings as may be required by the Summons; and that the said Defendant is now in default.

An attempt was made to effect a reconciliation but without avail, and I find that further efforts would be futile.

Upon hearing the Plaintiff and her witness, I find:

(a) That the Plaintiff and the Defendant are both citizens and residents of the State of South Carolina and the County of Richland and have been for more than one year next preceding the commencement of this action;

(b) That this action was commenced and suit papers filed in the said Clerk's office more than sixty (60) days before the date of the hearing and more than ninety (90) days before the date of this Decree;

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(c) That the Plaintiff and the Defendant were lawfully married in Sumter, South Carolina, on January 27, 1971; and that, of this marriage, no children have been born and none are expected;

(d) That the Plaintiff has grounds for divorce a vinculo matrimonii on the ground of physical cruelty;

(e) That the Plaintiff has been a kind and dutiful wife to the Defendant and did not in any way cause, justify or provoke the Defendant's actions;

(f) That there appears to be no fraud or collusion between the parties in the institution of this action;

(g) That the Plaintiff should be allowed to resume the use of her maiden name, Hudnall, for any and all purposes;

(h) That the Plaintiff is entitled to a one-half interest in the joint savings account of the parties at Home Federal Savings and Loan Association, said one-half (1/2) interest equalling approximately One Thousand (\$1,000.00) Dollars;

(i) That the Plaintiff does not seek any alimony; and that the Plaintiff is not seeking attorney's fees;

(j) That the Plaintiff should be barred as to any interest or dower rights in any and all property now owned, or hereafter acquired, by the Defendant.

NOW, THEREFORE, on motion of Plaintiff's counsel and in consideration of the findings hereinabove set forth:

IT IS ORDERED, ADJUDGED AND DECREED:

(1) That the Plaintiff be, and hereby is, granted an absolute divorce from the bonds of matrimony heretofore existing between her and the Defendant herein on the ground of physical cruelty;

(2) That the Plaintiff be, and hereby is, authorized and directed to use her maiden name, Kathleen E. Hudnall, for any and all purposes;

(3) That the Plaintiff is, by this Decree, granted no attorney's fees;

(4) That the Plaintiff is, by this Decree, granted a one-half (1/2) interest in the joint savings account of the parties at Home Federal Savings and Loan Association;

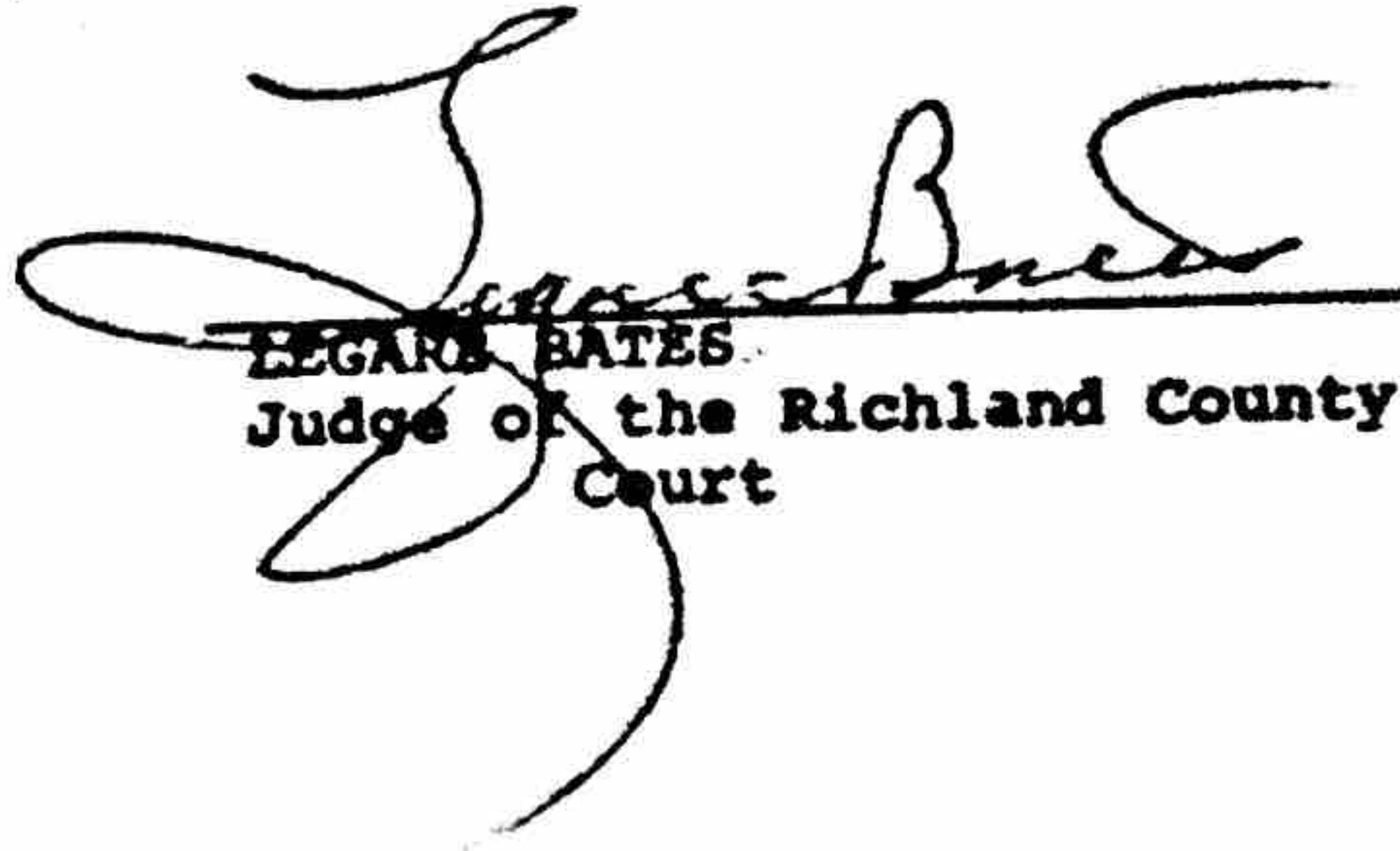
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87120

(5) That the Plaintiff be, and hereby is, barred as to any alimony, lump sum or periodic, and as to any interest or dower rights in and to any and all property now owned, or hereafter acquired, by the Defendant.

AND IT IS SO ORDERED, ADJUDGED AND DECREED.

  
EGAR BATES  
Judge of the Richland County  
Court

Columbia, South Carolina

15 day of March, 1974.



STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

IN THE RICHLAND COUNTY COURT

KATHLEEN E. PARNELL,  
Plaintiff,

-vs-

ARCHIE W. PARNELL,  
Defendant.

C O M P L A I N T

FILED  
NOV 12 3 30 PM '63  
JOHN R. T. MAJOR  
C. C. C. P. & G.

The Plaintiff above-named, complaining of and against  
the Defendant herein, alleges:

1. That the Plaintiff and the Defendant are both  
citizens and residents of the State of South Carolina and the  
County of Richland and have been citizens and residents of the  
said State and County for more than one (1) year next preceding