

STATE OF ALABAMA  
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, that you summon KELLEY SKINNER to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction within sixty days after the service of the summons, and there to answer, plead or demur without oath to a Bill of Complaint, lately exhibited by NORA JOSEPHINE SKINNER against the said Kelley Skinner and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Circuit Court, this 13<sup>th</sup> day of May, 1943.

R. S. Duck  
Register.

NORA JOSEPHINE SKINNER  
COMPLAINANT

VS

KELLEY SKINNER  
RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY.

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA  
IN EQUITY:

Now comes your Complainant, NORA JOSEPHINE SKINNER and humbly complaining against the Respondent, Kelley Skinner, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Respondent are both over the age of twenty one years, and residents of Baldwin County, Alabama;

2.

That your Complainant and the Respondent were married in Pensacola, Florida, on September 3rd, 1935, and lived together as husband and wife until on May 8th, 1943;

3.

That on, to-wit, May 8th, 1943, and at various other times, the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health; that 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 violence to her person which would necessarily endanger her life and health.

4.

That there was born to said marriage between your Complainant and the Respondent, one child, Mary Elizabeth Skinner, who is now and has been all of her life, living with the Complainant, who is a fit, proper and suitable person to have her care and maintenance; that the Respondent is an able bodied man employed at Brookley Field as Assistant-Storekeeper at a salary of approximately \$125.00 per month.

WHEREFORE, the p emises considered, your Complainant prays that your Honor will, by proper process, make the said Kelley Skinner 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.

Complainant further prays that upon a final hearing hereof, your Honor will give and grant unto her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent, and that your Honor will given and grant unto her such other, further, different and general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

BEEBE & HALL

BY *Shirley*  
Solicitors for Complainant.

NORA JOSEPHINE SKINNER  
Complainant

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

VS

KELLY SKINNER  
Respondent

And now comes the Respondent, and denies each and every allegation contained in the Complainant's Bill of Complaint, and demands strict proof of the same.

The Respondent waives notice of the time of taking testimony on behalf of Complainant, the right to cross examine the Complainant's witnesses, and agrees that this cause be submitted forthwith for final decree, without notice.

The Respondent accepts service of the summons and complaint in this cause.

Kelly Skinner  
Respondent.

WITNESS:

Bernice Reid

NORA JOSEPHINE SKINNER  
Complainant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

VS

IN EQUITY.

KELLY SKINNER  
Respondent

KNOW ALL MEN BY THESE PRESENTS that, whereas, the  
Complainant and the Respondent in the above styled cause are husband  
and wife;

WHEREAS, it has been found impossible for them to  
any longer live together and husband and wife;

WHEREAS they have reached a settlement as to alimony  
and the custody of their minor child;

NOW, THEREFORE, THESE PRESENTS WITNESSETH that the said  
Nora Josephine Skinner is to have the custody, care and control of their  
minor child, Mary Elizabeth Skinner, and that the said Kelly Skinner is to  
pay to the said Nora Josephine Skinner as permanent alimony for the care  
of her and the said minor child, the sum of \$7.50 per week, payable on  
the first and 15th of each and every month hereafter, the first payment to  
be made on the 15th day of May, 1943.;

That the said Kelly Skinner will pay all court costs  
and attorneys fees.

IN WITNESS WHEREOF, the parties hereto have hereunto set  
their hands and seals on this the 10th day of May, 1943.

Kelly Skinner (SEAL)  
Nora Josephine Skinner (SEAL)

STATE OF ALABAMA  
BALDWIN COUNTY.

I, H. M. Hall, a Notary Public in and for said County in  
said State, hereby certify that NORA JOSEPHINE SKINNER and KELLY SKINNER  
whose names are signed to the foregoing instrument, and who are known to me,  
acknowledged before me on this day that, being informed of the contents of  
the instrument, they executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 10th day of May, 1943.

H. M. Hall  
Notary Public, Baldwin County, Alabama



RECORDED

RECORDED

939

Done

Filed May 17 1943  
Product  
By

939  
~~RECORDED~~  
NORA JOSEPHINE SKINNER

COMPLAINANT

VS

KELLEY SKINNER,

RESPONDENT.

SUMMONS AND COMPLAINT.

~~RECORDED~~

Executed May 19<sup>th</sup> 1943  
by serving copy of within Summons and  
Complaint on

Kelley Skinner

W. R. Sweet Sheriff

By \_\_\_\_\_ Deputy Sheriff

RECORDED

NORA JOSEPHINE SKINNER  
COMPLAINANT

VS

KELLEY SKINNER  
RESPONDENT

ANSWER AND WAIVER.

*Filed*

*5-13-43*

*P.S. Duck -*

*Register*



NORA JOSEPHINE SKINNER  
COMPLAINANT

VS

KELLEY SKINNER,  
RESPONDENT

RECORDED

*Filed*

*5-13-43*

*R. S. Luck*

*Register*

NORA JOSEPHINE SKINNER  
 COMPLAINANT  
 VS.  
 KELLEY SKINNER  
 RESPONDENT.

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

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, Answer and waiver of respondent, testimony as noted by the Register, and agreement as to alimony and custody of child

and in behalf of Defendant upon \_\_\_\_\_

R.S. Luck Register.

REQUEST FOR DECREE IN VACATION

Printed by The Baldwin Times

State of Alabama,  
Baldwin County.

} NO. \_\_\_\_\_ TERM, 194<sup>3</sup>

NORA JOSEPHINE SKINNER

Complainant—.

VS.

KELLEY SKINNER

Respondent—.

TO R. S. DUCK, REGISTER:

In the above stated cause a n answer and waiver  
having been filed by \_\_\_\_\_ the Respondent—,  
and evidence having been taken, and the cause being ready for submission for final decree, and  
no defense having been interposed, the complainant—, by Beebe & Hall  
Solicitor<sup>s</sup> of record, now files with the Register of this Court this written request to deliver the  
papers in this cause to the Judge for final decree in vacation.

\_\_\_\_\_  
Solicitor<sup>s</sup> for Complainant—.

**RECORDED**  
NO. \_\_\_\_\_

NORA JOSEPHINE SKINNER

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Complainant—

VS.

KELLEY SKINNER

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Respondent—

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**Request For Decree In Vacation**

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Filed May 13, 1943

R. S. Neuch

Register.

RECORDED

No. \_\_\_\_\_

The State of Alabama,  
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

Nora Josephine Skinner  
Complainant

VS.

Kelley Skinner,  
Respondent

NOTE OF TESTIMONY

Filed in Open Court this 13<sup>th</sup>

day of May 1943

R.S. Luck  
Register.

THE STATE OF ALABAMA }  
Baldwin County

Circuit Court of Baldwin County, Alabama,  
(In Equity)

NORA JOSEPHINE SKINNER

COMPLAINANT

VS.

KELLEY SKINNER

RESPONDENT

I, Bernice F. Reid

as Register and Commissioner

have called and caused to come before me Nora Josephine Skinner

witness— named in the Requirement for Oral Examination, on the 10th day of May

19 43, at the office of Beebe & Hall

in Bay Minette, Alabama, and having first sworn said witness— to speak the truth,

the whole truth, and nothing but the truth, the said Nora Josephine Skinner

doth depose and say as follows:

My name is Nora Josephine Skinner. I am a resident of Baldwin County, Alabama, and over 20 years of age.

The Respondent, Kelly Skinner, is over 21 years of age and a resident of Baldwin County, Alabama.

The Respondent and I were married in Pensacola, Florida on September 3rd, 1935. We have lived in Baldwin County continuously since that time.

It has developed that the Respondent and I can no longer live together, in any peace, as husband and wife. The Respondent has at various times within the past few months threatened and abused me and has often threatened to do violence to my person which would necessarily endanger my life and health. The conduct of the Respondent is such that I have every reasonable apprehension to believe, and do actually believe that if I continue to live with him as his wife he will do violence to my person which would necessarily endanger my life and health.

The conditions have grown worse from time to time until it was necessary for me to finally make up my mind that we could no longer live together, which was on Saturday, May 8th.

We have one child, now practically four years of age, Mary Elizabeth Skinner, who is now and has been all of her life, living with me.

The Respondent is at present employed at Brookley Field, in Mobile, Alabama, as assistant store-keeper at a salary of approximately \$125.00 per month.

Nora Josephine Skinner

ORAL EXAMINATION

I, Bernice F. Reid, as Register and Commissioner hereby certify that the foregoing deposition— on Oral Examination was taken down in writing by me in the words of the witness— and read over to her and she signed the same in the presence of myself and of H. M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness— or had proof made before me of the identity of said witness—; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 10 day of May, 19 43.

Bernice F. Reid (L. S.)

No. \_\_\_\_\_ Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
**Baldwin County**

IN CIRCUIT COURT, IN EQUITY

NORA JOSEPHINE SKINNER

Complainant

Vs.

KELLEY SKINNER

Respondent

**ORAL DEPOSITION**

Filed May 13<sup>th</sup>, 1943

A.S. Black, Register

RECORDED IN

Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register