

Respondent one child, Walter Madison McKinley, now two years of age, who is now and has been all of his life living with your Complainant.

PRAYER FOR PROCESS.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said MATT McKINLEY party Respondent to this cause of action, 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 your Honor will, upon the hearing hereof, enter an order and decree granting to the Complainant an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that she be awarded the care, custody and control of the said minor child, Walter Madison McKinley. Complainant prays for such other, further, different or 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: 
Solicitors for the Complainant.

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Virginia McKinley

Complainant

VS.

Matt McKinley

Respondent

I, Lillian Patterson

as ~~Register and~~ Commissioner

have called and caused to come before me Virginia McKinley

witness named in the Requirement for Oral Examination, on the 25th day of June
1945, 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 Virginia McKinley
doth depose and say as follows:

My name is Virginia McKinley. I am a bona fide resident of Baldwin County,
and over twenty-one years of age.

The Respondent is over twenty-one years of age, and a bona fide resident of
Escambia County, Alabama.

The Respondent and I married at Urish, Alabama, on the 11th day of May 1940.
We lived together as husband and wife in Baldwin County, Alabama, and Monroe
County, Alabama, until the 22nd day of May 1941.

The Respondent on May 22, 1941, voluntarily abandoned me and has remained away
voluntarily and continuously since that time.

My child was very sick at the time he abandoned me, and he has not since that
time made any effort to see me or my child.

My child is now four years old and has all his life been living with me, and I
have had the responsibility of maintaining and supporting him. The Respondent
has contributed nothing toward his support.

I have a home and place for rearing my child, Walter Madison McKinley.

Virginia McKinley

Respondent one child, Walter Madison McKinley, now two years of age, who is now and has been all of his life living with your Complainant.

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DEESS & HALL

By:
Solicitors for the Complainant.

STATE OF ALABAMA,
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

WE COMMAND YOU, that you summon MATT McKINLEY, 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 summons, and there to plead, answer or demur, without oath, to a bill of complaint lately exhibited by VIRGINIA McKINLEY, against the said MATT McKINLEY, 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 of the law. And we further command that you return this writ with your execution thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Circuit Court, this the 23
Day of September, 1943.

R. S. Duck
Register

VIRGINIA McKINLEY,
COMPLAINANT,

VS.

MATT McKINLEY,
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, Virginia McKinley, and humbly complaining against the Respondent, Matt McKinley, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

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

2.

That they were married at Uriah, Alabama, on May 11th, 1940, and lived together as husband and wife until, to-wit, May 22nd, 1941;

3.

That on, to-wit, May 22, 1941, the Respondent voluntarily abandoned the bed and board of the Complainant and has remained away voluntarily and continuously since that time;

4.

That there was born to the marriage between your Complainant and the

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

VIRGINIA MCKINLEY

Complainant

VS.

MATT MCKINLEY

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~
on Answer & Waiver of the Respondent and Testimony as noted by the Register, and upon
consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed
for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony here-
tofore existing between the Complainant and Defendant be, and the same are hereby, dissolved,
and that the said Virginia McKinley
is forever divorced from the said Matt McKinley

for and on account of abandonment.

It is further ordered, adjudged and decreed by the Court that the
Complainant, Virginia McKinley be, and she is hereby awarded the custody
of the minor child, Walter Madison McKinley.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry
except to each other until sixty days after the rendition of this decree, and that if appeal is taken within
sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted
to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Virginia McKinley
the Complainant pay the cost herein to be taxed, for which execution may issue.

This 29th day of June, 1945

[Signature]

Judge Circuit Court, in Equity.

I, _____, Register of the Circuit

Court of Baldwin County, Alabama, do hereby certify that the
foregoing is a correct copy of the original decree rendered by the
Judge of the Circuit Court in the above stated cause, which said
decree is on file and enrolled in my office

Witness my hand and seal this the _____ day

of _____, 19____

Register of Circuit Court, in Equity

VIRGINIA MC KINLEY)

Complainant)

VS.)

MATT MC KINLEY)

Respondent)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY.

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint filed in said cause says:

That he denys the allegations of the Complaint and demands strict proof thereof.

The Respondent waives notice of taking of testimony and notice of submission of this cause and agrees that said testimony may be taken and said cause submitted without further notice to him.

The Respondent hereby accepts service of a copy of the amended Complaint filed in said cause.

Matt M. Kinley
Respondent.

Hubert A. Rouse
Solicitors for Respondent.

STATE OF ALABAMA,
BALDWIN COUNTY.

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WITNESS, R. S. DUCK, Register of said Circuit Court, this the _____ Day of September, 1943.

Register

VIRGINIA McKINLEY,
COMPLAINANT,

VS.

MATT McKINLEY,
RESPONDENT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY.

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

Now comes your Complainant, Virginia McKinley, and humbly complaining against the Respondent, Matt McKinley, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

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

2.

That they were married at Urich, Alabama, on May 11th, 1940, and lived together as husband and wife until, to-wit, May 22nd, 1941;

3.

That on, to-wit, May 22, 1941, the Respondent voluntarily abandoned the bed and board of the Complainant and has remained away voluntarily and continuously since that time;

4.

That there was born to the marriage between your Complainant and the