

1229

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

Willis McKinley McGhee Complainant

VS.

Arentha McGhee Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Answer and Waiver of Defendant 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 heretofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and that the said Willis McKinley McGhee is forever divorced from the said Arentha McGhee

for and on account of Habitual Drunkenness after Marriage

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 Willis McKinley McGhee the Complainant pay the cost herein to be taxed, for which execution may issue.

This 29th day of November, 1944

J. M. Hare
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

No. _____ Page _____

The State of Alabama
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Willis McKinley McShee
vs. Complainant

Arentha McShee

Respondent

DIVORCE DECREE

Filed this 30 day of

Jan, 1947

[Signature]
Register

WILLIS MCKINLEY MCGHEE
Complainant

VS.

ARENTHA MCGHEE
Defendant

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

And now comes the Defendant in her own proper person and accepts service of the summons and complaint in the above styled cause, and denies each and every allegation contained in the bill of complaint, and demands strict proof of the same.

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

Arentha M. Ghee
Defendant.

Witness:

James P. Johnson
W. D. Walker

Answer

7 ed

11-27-44

P.S. Luck
Reg

Willis McKinley McGhee
Complainant,
VS.
Arentha McGhee
Respondent.

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

DEMAND FOR ORAL EXAMINATION.

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from

Bay Minette, in the County of Baldwin

Alabama, the place of trial of said cause, to-wit:

Fay Jackson, Ethel Jackson and Will McGhee

2. That said complainant requires an oral examination of said witnesses before a com-

missioner appointed by the Register of this Court.

Beebe & Hall
By: *H. C. Beebe*
Solicitor for Complainant.

NOTE:

Complainant suggests the name of Virginia Keel

as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Beebe & Hall
By: *H. C. Beebe*
Solicitor for Complainant.

DEMAND FOR ORAL EXAMINATION.

Willis McKinley McGhee.....

Complainant,

Vs.

Aretha McGhee.....

Respondent.

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

Filed this 27..... day of Nov.....

1944.....

R.S. Duck.....

Register.


STATE OF ALABAMA
BALDWIN COUNTY

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

TO Virginia Keel, who resides in Baldwin County, State of
Alabama, Greeting:

Know you, that we, reposing confidence in your integrity, skill and ability, have appointed you commissioner to take the testimony of Fay Jackson, Ethel Jackson and Will McGhee, material witnesses in a suit now pending in the Circuit Court of Baldwin County, Alabama, in Equity, wherein Willis McKinley McGhee, Complainant and Arentha McGhee, Defendant; and we hereby authorize and empower you to call and cause to come before you the said witnesses and their depositions on oath to take, as well as for the complainant as for the defendant touching their knowledge of the matters and things in controversy in said suit, which depositions when so taken shall be signed by said witnesses and certified by you as such commissioner as herein; and you are further commanded that the deposition when so taken, with this commission, to return under your hand and seal to the register of said court, with all convenient speed.

Witness my hand, this the 29 day of November,
1944.


Register.

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Willis McKinley McGhee Complainant

VS.

Arentha McGhee Respondent

I, Virginia Keel

~~as Register and~~ Commissioner

have called and caused to come before me

Fay Jackson, Ethel Jackson and Will McGhee

witness^{es} named in the Requirement for Oral Examination, on the 25 day of November 1944, at the office of Beebe & Hall in Bay Minette, Alabama, and having first sworn said Witness^{es} to speak the truth, the whole truth, and nothing but the truth, the said Fay Jackson doth depose and say as follows:

My name is Fay Jackson. I live in Escambia County, Alabama, near Atmore. I am seventeen years of age. I know Willis McKinley McGhee and his wife, Arentha McGhee. They were married in March, 1941 at Bay Minette, both of them were residents of Baldwin County, Alabama. Willis McKinley McGhee is now in the armed services of the United States. At the time of their marriage Arentha McGhee was a sober, industrious woman and not addicted to excessive use of alcohol but since their marriage and since he has been in the armed services she has become addicted to the excessive use of alcohol and has become and is an habitual drunkard. I have frequently seen her at night clubs late at night in a drunken condition. She goes out nearly every week end and sometimes oftener with men and stays out until late at night or early the next morning and on numerous occasions I have seen it well after midnight at jook joints in a drunken condition. Willis McKinley McGhee has been in the army a little better than two years. Willis McKinley McGhee and Arentha are both over the age of twenty-one years.

Fay Jackson

Ethel Jackson, after first having been duly sworn doth depose and say that:

My name is Ethel Jackson. I am a resident of Escambia County, Alabama. I have known Willis McKinley McGhee and his wife, Arentha McGhee for about five years. I am the wife of Fay Jackson. We lived close to the McGhees. Arentha McGhee is now living in Baldwin County with her sister at Seminole. I have seen her a number of times within the last twelve months and up to the last few days. They married at Bay Minette in Baldwin County in March, 1941 and lived together until Willis McKinley McGhee went into the army. Since he left she has started running around with men to jook joints all over Baldwin County, and Escambia County and frequently drinks to excess. She did not drink to excess before their marriage but since their marriage she has become an habitual drunkard. I know this because I have known her to stay out late at nights and have seen her at jook joints and beer parlours in a drunken condition.

Ethel Jackson

Will McGhee, after first having been duly sworn doth depose and say that:

My name is Will McGhee. I am the father of Willis McKinley McGhee. He is over the age of twenty-one years. He has heard of Arentha's conduct and has asked me to employ counsel and bring suit for defense against her. She has been running around with a cousin of his, Homer Daughtery and has been going to jook joints and getting drunk.

Will McGhee

ORAL EXAMINATION.

I, Virginia Keel, as ~~Register~~ and ~~X~~ Commissioner hereby certify that the foregoing deposition ~~s~~ on Oral Examination was taken down by me in writing in the words of the witness ~~es~~ and read over to them and they signed the same in the presence of myself and W. G. Beebe

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ~~es~~ or had proom made before me of the identity of said witness ~~es~~; 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 25 day of November, 1944.

Virginia Keel (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Mc Kee

vs. Complainant

Mc Kee

Respondent.

Oral Deposition

Filed 11-27, 1944

R. S. Wicks, Register.

Recorded in

Record

Vol. _____ Page _____

Register.

STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. _____ Term, 194_____

Willis McKinley McGhee _____, Complainant

Vs.

Arentha McGhee _____, Defendant

To R. S. Duck _____, Register

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, 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 _____ Solicitors 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 vaca-

No. _____ Page _____

The State of Alabama,
Baldwin County
CIRCUIT COURT, IN EQUITY

Vs.

**REQUEST FOR DECREE IN
VACATION**

Filed 11-27, 1944

R.S. Smith
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

Willis McKinley McGhee

vs.

Arentha McGhee

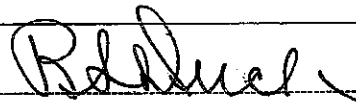
THE STATE OF ALABAMA
Baldwin County

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 Defendant, Testimony of Complainant's witnesses

and in behalf of Defendant upon _____



Register.

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

Willis McKinley McGhee

vs.

Arentha McGhee

NOTE OF TESTIMONY

Filed in Open Court this 27
day of Nov 1984

R.S. Luck

REGISTER

STATE OF ALABAMA
BALDWIN COUNTY

WE COMMAND YOU, that you summon ARENTHA McGHEE to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery jurisdiction, within thirty days after the service of summons, and there to answer, plead or demur, without oath, to a bill of complaint lately exhibited by WILLIS MCKINLEY McGHEE against the said ARENTHA McGHEE and further to do and perform what said Judge shall order, and direct in that behalf, and this the Defendant shall in no wise omit, under penalty of the law; and we further command that you return this writ with your endorsement thereof, to our said court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register, of said Circuit Court of Baldwin County, Alabama, this 27 day of November, 1944.

R. S. Duck

WILLIS MCKINLEY McGHEE
COMPLAINANT

VS.

ARENTHA McGHEE
DEFENDANT

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

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

And now comes your Complainant, WILLIS MCKINLEY McGHEE and humbly complaining against ARENTHA McGHEE, Defendant, respectfully shows unto your Honor:

FIRST:

That your Complainant and the said ARENTHA McGHEE, are each over the age of twenty-one years, that your Complainant and Defendant are residents of Baldwin County, Alabama, that the Complainant is now in the overseas armed services of the United States, that Complainant and Defendant are husband and wife having intermarried at Bay Minette, Alabama in March, 1941.

SECOND:

That at the time of the marriage of the Complainant and Defendant the Defendant was a sober and industrious woman and not addicted to the excessive use of alcohol; that about

two years ago the Complainant was inducted into the military services of the United States and since his induction and while he has been in such armed services the Defendant has become addicted to the excessive use of alcohol as a beverage and has become and is an habitual drunkard and frequently visits jook joints and beer parlours in the company of men and stays out late at night and on such occasions becomes completely and unseemly drunk and that this has become and is a habit of hers and has extended over a period of over a year.

Wherefore your complainant prays that this Honorable Court will take the jurisdiction of the cause made by this bill of complaint and make the said ARENTHA MCGHEE, party defendant hereto and by appropriate process requiring her to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the final hearing of this cause this Honorable Court will make and enter a decree forever dissolving the bonds of matrimony existing between this Complainant and the said Defendant and Complainant prays for such other, further or different relief as in equity and good conscience he shall be entitled to receive in the premises.

BEEBE & HALL

BY W. C. Beebe
Solicitors for Complainant.

1229

Summons
and
Complaint

Willis McKinley McKee
Complainant

vs.

Arentha McKee
Defendant

Filed

11-27-44

R.S. Duck
Reg
J