

4679

LOIS ELIZABETH MCKINLEY	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT	Ø	BALDWIN COUNTY, ALABAMA,
VS	Ø	IN EQUITY
RUBEN F. MCKINLEY	Ø	
RESPONDENT	Ø	

Comes now the Respondent in the above styled cause and demurrs to the Complainant's Complainant and for grounds therefor says:

1.

For aught appearing, the court does not have jurisdiction of this cause.

2.

The Complaint fails to show that the parties to this suit are citizens of Baldwin County, Alabama.

3.

The Complaint fails to show the length of time the parties to this cause have resided in Baldwin County.

4.

The Complaint attempts to set up cruelty as a grounds for divorce, but fails to do so with sufficient particularity.

Wiltors & Brantley

BY: J. Allen M. Brantley

FILED

JUL 26 1957

ALICE J. DUCK, Register

4079

FILED

JUL 25 1957

AMER. L. BUREAU, PHOTODUPLICATION

Before me, Tolbert M. Brantley, a Notary Public, in and for said county,  
in said State, personally appeared Reuben F. McKinley who is known to me,  
and who being by me first duly sworn, deposes and says, that he has knowledge

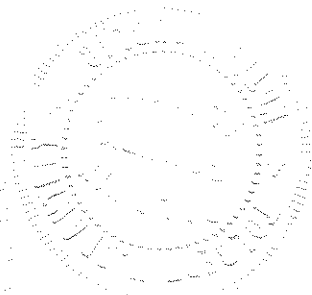
of the facts of the above petition and that the same are true.

Robert F. McQuilley

Sworn to and subscribed before me this 7 day of November, 1958.

Robert M. Brantley  
Notary Public, Baldwin County, Alabama

filed Nov. 7, 1958  
Alice J. Black,  
Register



4079 1/2

LOIS ELIZABETH MCKINLEY

COMPLAINANT

VS

REUBEN F. MCKINLEY

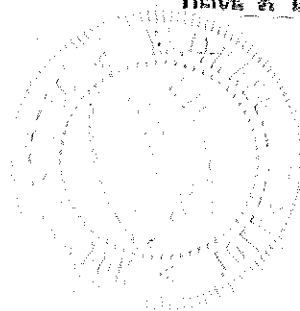
RESPONDENT

PETITION FOR RULE TO SHOW CAUSE

FILED

NOV 7 1958

ALICE J. DUCK, CLERK  
REGISTER



*Exempted*

*11/11/58*

*Geton Keen L.S.  
Atmore, Ala*

ORDER

LOIS ELIZABETH MCKINLEY,	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT,	Ø	BALDWIN COUNTY, ALABAMA
VS	Ø	IN EQUITY
RUEBEN F. MCKINLEY,	Ø	
RESPONDENT	Ø	

THIS DAY CAME RUEBEN F. MCKINLEY, and presented unto this court his sworn petition requesting the court to revoke his order granting temporary custody of his two minor children, Carolyn Elaine McKinley and Rita Faye McKinley, to the Complainant, Lois Elizabeth McKinley, and praying that he be granted the temporary custody of the said minor children and upon consideration thereof, IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED that this matter be set for a hearing at 9 A. M., on the 8 day of August, 1957. It is further ordered that the Sheriff of said County forthwith serve a copy of this order together with a copy of said petition upon Lois Elizabeth McKinley, the Complainant in this cause.

Done this the 26th day of July, 1957.

Hubert M. Hays  
CIRCUIT JUDGE

LOIS ELIZABETH MCKINLEY,

COMPLAINANT

VS

RUEBEN F. MCKINLEY,

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. ....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon RUEBEN R. McKINLEY

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 \_\_\_\_\_

RUEBEN F. McKINLEY

\_\_\_\_\_, Defendant .....

by LOIS ELIZABETH McKINLEY

\_\_\_\_\_, Plaintiff .....

Witness my hand this 9th day of July 19 57

W. J. Shack, Clerk



No. 4079 Page .....

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT**

LOIS ELIZABETH MCKINLEY

Plaintiffs

vs.

RUEBEN F. MCKINLEY

Defendants

**SUMMONS and COMPLAINT**

Filed 7-9-57, 19.....

Alice J. Shuck, 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

*I hereby accept  
service this  
11th day of July 1957*

*(Rueben F. McKinley)*

\_\_\_\_\_, Sheriff

\_\_\_\_\_, Deputy Sheriff

STATE OF ALABAMA    §

BALDWIN COUNTY      §

LOIS ELIZEBETH MCKINLEY,    §

COMPLAINANT,               §

VS.                         §

RUEBEN F. MCKINLEY,        §

RESPONDENT.                §

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY

TO THE HONORABLE HUBERT HALL, Judge of the Circuit Court  
of Baldwin County, Alabama, In Equity Sitting:

Your Complainant, Lois Elizebeth McKinley respectfully  
represents unto Your Honor as follows:

1. That your Complainant is a resident of the City of Bay  
Minette, Baldwin County, Alabama, and is over the age of twenty-  
one years; the Respondent, Rueben F. McKinley, is a resident of  
the City of Bay Minette, Baldwin County, Alabama, and is over the  
age of twenty-one years.

2. That your Complainant and Respondent were married in the  
Town of Pollard, Escambia County, Alabama, on the first day of  
August, 1954, and during the course of their matrimony, two  
daughters, Carolyn Elaine McKinley, age four months, and Rita  
Faye McKinley, age three years, were born unto the Complainant  
and Respondent.

3. Your Complainant further alleges and avers that on or  
about June 10, 1957, said Respondent began cursing and arguing  
with the Complainant, and that the Respondent committed actual  
violence upon the person of the Complainant by stricking and  
pushing her with his hands, knocking her down and during the  
struggle thereby causing the Complainant to be thrown upon and  
against a bed, consequently her neck was jerked and made very  
painful and sore and caused great suffering for several hours,  
all of which actual violence was attended with danger to the life  
and health of the said Complainant.

4. That the week next preceding the above mentioned in-  
cident, the Complainant was walking away from her house and out  
into the yard when the Respondent grabbed the Complainant and

gripped and twisted the Complainant's arm and gripped around the Complainant's body with such force and violence upon her person that she was caused much pain and suffering, and such violence was attended with danger to her life or health.

6. Your Complainant further charges that the Respondent has abused and humiliated her for attending a certain denomination of the Christian Church, and on an infinite number of occasions he has cursed her and called her obscene names, on various occasions he has called her a bitch, he has threatened to stamp your Complainant into the ground, and has made such statements as, "I ought to kill you," many times, and from such conduct there is reasonable apprehension that such physical violence endangers the life or health of the Complainant.

7. Your Complainant further avers that she now has the infant child, Carolyn Elaine McKinley, in her custody and control, and that the Respondent now has custody and control of the other minor child, Rita Fay McKinley.

8. That the said Respondent is not a fit person to have the custody and control of the said minor children; that he is habitually rude, profane, vulgar, obscene, and insulting in his language in and about his household.

9. Your Complainant alleges that she is a fit and Christian person, amiable and virtuous, and a proper person to have the custody and control of the said minor children; that she loves them, and that because of their tender years, she can offer them the care and guidance and control which is necessary for children of such tender years.

10. Your Complainant avers that it would be to the best interest, safety and well-being of the said minor children if she be granted the immediate custody and control of the said children, subject to the further orders of this Honorable Court.

11. That there are several articles of household furniture that the Complainant has worked hard for and paid for or partially paid for to which she alleges that she is entitled to have.

12. That the Respondent has denied her the right to enter upon the premises of their homestead and remove her clothing

or even to procure a change of clothing and personal wearing apparel.

WHEREFORE THE PREMISES CONSIDERED, Your Complainant prays as follows, to-wit:

(A) That Your Honor will take jurisdiction of this Bill of Complaint, and that the said Rueben F. McKinley be made a party Respondent to this Bill of Complaint, by appropriate process, in the manner required by law and the rules of this Honorable Court;

(B) That Rueben F. McKinley be required to answer, plead, or demur to this Bill of Complaint within the time required by law and the rules of this Honorable Court.

(C) That the bonds of matrimony presently existing between the Complainant and Respondent be dissolved, and the Complainant be granted the right to again contract marriage within the time prescribed by law, if she so desires.

(D) That Your Honor will grant unto the Complainant the custody of the said minor children, Carolyn Elaine McKinley and Rita Fay McKinley, during the pendency of this litigation, subject to the further orders of this Honorable Court.

(E) That upon the final hearing of this cause, a further order and decree awarding and granting the custody of the said minor children, Carolyn Elaine McKinley and Rita Fay McKinley, to the Complainant.

(F) That the Complainant be awarded a reasonable amount of money, to be paid each month by the Respondent, for the support and maintenance of herself and the two minor children.

(G) That Your Complainant may be granted the right to enter upon the premises of the Complainants and Respondents homestead and secure her clothing which belongs to her and to which she is entitled.

(H) That Your Complainant be granted all such other, further and different relief to which she may be entitled under the pleadings and proof, and that she be granted general relief.

  
Wm. Roy Stokes  
Solicitor for Complainant

STATE OF ALABAMA

Escambia COUNTY

Before me, Kathryn K. Reynolds, a  
Notary Public in and for said county, personally appeared  
Jois McKinley, who is known to me and who being by  
me first duly sworn, deposes and says that he has knowledge of  
the facts stated in the above Bill of Complaint and that the  
same are true.

Kathryn K. Reynolds  
NOTARY PUBLIC  
Escambia COUNTY,  
ALABAMA.

filed 7-9-57

Alice J. Luck, Clerk.

~~Executed~~ - July 11, 1957

on. Rueben F. McKinley

Accepted service

LOIS ELIZABETH MCKINLEY,            Ø    IN THE CIRCUIT COURT OF  
                                         Ø    BALDWIN COUNTY, ALABAMA,  
VS                                    Ø    IN EQUITY  
RUEBEN F. MCKINLEY,               Ø    NO. 4079  
                                         Ø

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,  
ALABAMA, IN EQUITY, SITTING:

Comes now the Respondent, Rueben F. McKinley, and represents and shows un-  
to your Honor as follows:

1.

That the Complainant has heretofore filed a bill for divorce from the Re-  
spondent in your Honor's Court in which she asked for temporary custody of  
Carolyn Elaine McKinley and Rita Faye McKinley, minor children born to the  
union of the Complainant and Respondent.

2.

That on a hearing of this cause, your Honor entered an order dated the  
15th of July, 1957, in which the court granted the temporary custody of the  
said minor children to the Complainant Lois Elizabeth McKinley, said order read-  
ing as follows:

"IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED that the custody,  
care and control of the minor children, Rita Faye McKinley and Car-  
olyn Elaine McKinley, be awarded to their mother, the Complainant,  
so long as the Complainant shall keep the said children within Bald-  
win County, Alabama, in the home of Mr. and Mrs. Dempsey Hadley, at  
Perdido, in Baldwin County, Alabama.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the  
said Complainant not remove the said minor children from Baldwin  
County, Alabama, without having first gotten permission from the  
Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the  
Respondent be, and he is hereby given the right to visit said minor  
children at all reasonable times.

Dated at Bay Minette, Alabama, this 15th day of July, 1957.

Hubert M. Hall  
Judge of the 28th Judicial  
Circuit of Alabama."

3.

That the Complainant has violated your Honor's decree in that she has  
moved the children from the home of Mr. and Mrs. Dempsey Hadley to the home of

Mr. and Mrs. Melvin Hadley.

4.

That she has violated this decree in that she has caused or allowed the people with whom she is staying to intimidate the Respondent so that he cannot visit with the said minor children.

5.

That she has violated the decree in that she has taken the said minor children or one of them out of Baldwin County, Alabama.

6.

Your Respondent says further that since the time of your Honor's decree granting temporary custody of his minor children to the Complainant, the said minor children or one of them has become ill and in the belief of your Respondent, this was caused by the lack of attention and care of the children by the Complainant.

7.

The Respondent says further that the minor brothers and sisters of the Complainant are frequently visiting in the home in which the Complainant is keeping the said minor children and because of their boisterous nature, the Respondent says that the children are in danger of being physically hurt and being made nervous and ill by their presence.

8.

The Respondent shows unto your Honor that he is a suitable and proper person to have the care, custody and control of his minor children; that his sister, Mrs. Lucy Belle Stanton, is now living in the home with your Respondent; that she is a mature and settled woman and is willing to help the Respondent in the care of these children. Your Respondent says further that in the event the court does not find that the home of the Respondent is a proper one in which to keep these said minor children, the Respondent's sister, Mrs. Lucy Belle Stanton, is willing to keep them in her home. The Respondent says that this is a modern six-room home and that his sister, Mrs. Lucy Belle Stanton, can devote her entire time to the care of these minor children. The Respondent says further that his mother, Mrs. Lucy V. McKinley, and his sister, Mrs. Eugenia Barnes, are both ready and willing to assist the Respondent in the care

of the said minor children.

PRAYER FOR PROCESS

The Respondent prays that the process of court be directed to the Complainant, commanding her to appear in this cause within the time and in the manner the court finds meet, premises considered.

PRAYER FOR RELIEF

Premises considered, the Respondent prays that your Honor will forthwith set this cause down for a hearing and upon hearing thereof, will modify the aforesaid decree, and give the temporary custody, care and control of said minor children, Rita Faye McKinley and Carolyn Elaine McKinley, to the Respondent, and in said decree will allow your Respondent permission to carry the children out of Baldwin County for medical treatment when and if necessary.

Your Respondent prays further that the Complainant be cited for contempt of your Honor's aforesaid order and be made to show cause why she should not be penalized therefor. The Respondent prays for such other, further or different relief to which he may, in Equity, be entitled.

*Rueben F. McKinley*  
Petitioner

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Tolbert M. Brantley, a Notary Public, in and for said County and State, personally appeared Rueben F. McKinley, who is known to me, who being by me first duly sworn, deposes and says that he has read the foregoing petition and that the facts alleged therein are true and correct.

*Rueben F. McKinley*

Sworn to and subscribed before me this 25th day of July, 1957.

*Tolbert M. Brantley*  
Notary Public, Baldwin County, Alabama

*filed July 25, 1957*  
*Alice J. Duck, Reg.*

*Executed Aug. 1, 1957*  
*on. Lois McKinley*  
*Elizabeth*





4079

Lois Elizabeth McKinley

vs.

Reuben McKinley

received \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_  
nd on 1 day of Aug 1957

served a copy of the within  
Lois Elizabeth McKinley

service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. A. Tolbert D. 9  
Resolidee

Sheriff claims 26 miles at  
Ten Cents per mile Total \$ 2.60  
TAYLOR WILKINS, Sheriff  
BY Tolbert  
DEPUTY SHERIFF

(In the served  
on Lois McKinley  
Resolidee, Ariz)

FILED

JUL 25 1957

ALICE A. ROCK, Register

CIVIL SUBPOENA — ORIGINAL — In case witness shall wish to charge for attendance, he shall produce to the Clerk in term this Subpoena, or within five days after adjournment of Court, else he shall be barred.

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

Case No. \_\_\_\_\_ TERM, 195\_\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETINGS:

You Are Hereby Commanded to Summon

*Jacob Hadley*

*Melvin Hadley*

if to be found in your County, at the instance of the

*Deputy*

to be and appear before the Honorable, the Judge of the Circuit Court of Baldwin County, at the Court House

thereof, by \_\_\_\_\_ o'clock of the forenoon, on the *8<sup>th</sup>* day of *Aug*, 195*7*, and from

day to day and term to term of said Court until discharged by law, then and there to testify, and the truth

to say, in a certain cause pending, wherein *Lois McHenry*, Plaintiff and *Reuben*

*McHenry*, Defendant.

Herein Fail Not, and have you then and there this Writ.

Given under my hand and seal, this *8* day of *Aug*, 195*7*.

*Deputy Clerk* Clerk.

SHERIFF

ORIGINAL

No. 4079

Page\_\_\_\_\_

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Lois McHenry

Plaintiff

Vs.

Reuben McKinley

Defendant

# CIVIL SUBPOENA

Issued this \_\_\_\_\_ day of \_\_\_\_\_

---

195\_\_\_\_\_

Clerk

*Egmont*

~~ORIGINAL~~ SUBPOENA—ORIGINAL—In case witness shall wish to charge for attendance, he shall produce to the Clerk in term this Subpoena, or within five days after adjournment of Court, else he shall be barred.

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

Case No. 4279 TERM, 194

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETINGS:

1. *Mrs. Eugenia Barnes - Perdido*
2. *Mrs. Lucy Bell Stanton* " "
3. *Mr. John Huff* " "
4. *Mr. Grover Redmond* " "
5. *Mr. J. E. Seymour* " "

You Are Hereby Commanded to Summon

if to be found in your County, at the instance of the

*Receipt*

to be and appear before the Honorable, the Judge of the Circuit Court of Baldwin County, at the Court House thereof,

by 9:00 o'clock of the forenoon, on the 14 day of Aug, 1957, and from day to day

and term to term of said Court until discharged by law, then and there to testify, and the truth to say, in a certain cause

pending, wherein *Lois McKinley* Plaintiff and *Penben McKinley* Defendant.

Herein fail not, and have you then and there this Writ.

Given under my hand and seal, this 10 day of Aug, 1957

*Deice J. Black* Clerk.

Received in office this 10 day of

August, 1957

SHERIFF

I have executed this writ:

8-12-57  
Mrs Eugenia Barnes  
Lucy Bell Stanton  
John Huff  
Grover Redmond  
J. E. Dugmon

W. A. Tolbert SHERIFF

ORIGINAL

No. 4079

Page

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

Louis McKinley

Plaintiff

VS.

Resiben McKinley

Defendant

Equity  
CIVIL

SUBPOENA

Issued this 10 day of

Aug

1957

W. A. Tolbert Clerk

*Edw. J. Smith*

~~FILE~~ SUBPOENA—ORIGINAL—In case witness shall wish to charge for attendance, he shall produce to the Clerk in term this Subpoena, or within five days after adjournment of Court, else he shall be barred.

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

Case No. 4079 ----- TERM, 194-----

TO ANY SHERIFF OF THE STATE OF ALABAMA—GREETINGS:

You Are Hereby Commanded to Summon: *1. Mrs. Alice Duck*  
*2. Judge W.R. Stuart*

*3. Judge Frank Propert*

*4. Mrs. Katie Schaefer*

*5. Mrs. George Lambert*  
if to be found in your County, at the instance of the *6. Mr. Buck Matthews*

to be and appear before the Honorable, the Judge of the Circuit Court of Baldwin County, at the Court House thereof,

by 9:00 o'clock of the forenoon, on the 14 day of Aug, 1947, and from day to day

and term to term of said Court until discharged by law, then and there to testify, and the truth to say, in a certain cause

pending, wherein *Louis McKimley* Plaintiff and *Benjamin McKimley* Defendant.

Herein fail not, and have you then and there this Writ.

Given under my hand and seal, this 10 day of Aug, 1947

*Alice Duck* Clerk.

Received in office this 10 day of

Aug., 1957

SHERIFF

I have executed this writ:

8-12-57

Mrs. Alice Duck

W.R. Stuart

Frank Probst

Mrs. Katie Shaw

Mrs. George Lambert

Buck Matthews

Taylor Walker  
W.D. Walker SHERIFF

ORIGINAL

No. 4079 Page \_\_\_\_\_

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

Loris Mc Kinley

Plaintiff

VS.

Reuben Mc Kinley

Defendant

CIVIL SUBPOENA

Issued this \_\_\_\_\_ day of

\_\_\_\_\_, 194\_\_\_\_

Clerk

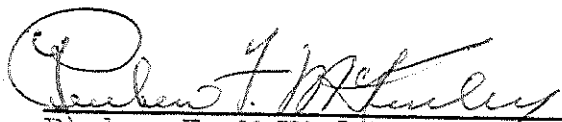
夏曆六月二十三日

That on to wit December 4, 1961, the Sheriff of Baldwin County, Alabama sent to Atmore, Alabama, in Escambia County and attached her, the Complainant and delivered her person to the Register, in accord with the sworn petition of the Respondent; that the Complainant asked that she be not held in contempt, but did not offer to deliver up the persons of the above named two minor children; that she does not have to be held in Contempt, for she has already been adjudged in contempt by said decree;



that she has no lawful status in this court, nor any other court until she purges herself of Contempt and that Your Respondent has a lawful right to the processes of the law to have his children delivered to him in accord with these several decrees; that this right has been violated, in that the Complainant was allowed and permitted to go free without even a bond or performance of said decree; that said Complainant has no regard for the courts and violates their orders and decrees at will, all of this in violation of the rights of the Respondent, amounting to a denial of Due Process of Law and denying him the equal protection of the laws, guaranteed by Constitutional law.

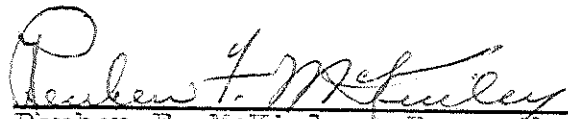
Wherefore, the premises considered, your Respondent prays this Honorable Court that he have the Complainant immediately taken into custody and held in jail until she delivers up the persons of said children in compliance with said decrees.



Reuben F. McKinley, Respondent

State of Alabama  
County of Baldwin

Before me, the undersigned authority, personally appeared Reuben F. McKinley, who being by me duly sworn deposes and says; that he has read the foregoing petition and the facts stated therein are true and correct.

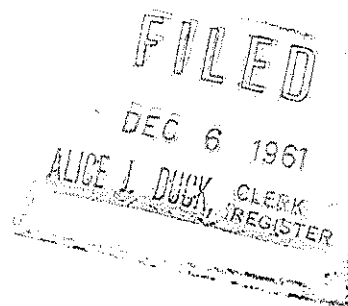


Reuben F. McKinley, Respondent

State of Alabama  
County of Baldwin

Subscribed and sworn to before me, on this, the 6th day of December, 1961.

  
Notary Public, Baldwin County, Alabama



ANSWER AND CROSSBILL

LOIS ELIZABETH MCKINLEY	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT	Ø	BALDWIN COUNTY, ALABAMA
VS	Ø	IN EQUITY
RUEBEN F. MCKINLEY,	Ø	
RESPONDENT	Ø	

Comes now the Respondent in the above styled cause and files this his answer and crossbill to the Complainant's Complaint.

1. For answer to Section 1, he says that the Complainant and Respondent reside in the city of Perdido, Alabama, and are each over the age of twenty-one years.

2. He admits the allegations of Section 2 of the Complaint except as to the age of Carolyn Elaine McKinley, who is now six months old.

3. For answer to Section 3 the Respondent denies the allegations therein and says further that he did push his wife across a bed on the date alleged in the Complaint but that he did no violence to her.

4. For answer to Section 4 of the Complaint, your Respondent says that on the occasion complained of, his wife threatened to take his child and go to her sisters in California; that the Respondent held the Complainant and forced her to bring the child back in the house. The Respondent says that he did no actual bodily harm to the Complainant at that time.

6. The Respondent denies the allegations of Section 6.

7. The Respondent says that the Complainant now has the temporary care, custody and control of Carolyn Elaine McKinley and Rita Faye McKinley.

8. The Respondent denies the allegations of Section 8 of the Complaint and says that he is a fit and proper person to have the custody and control of his minor children; that he maintains a good Christian home and that it is a proper place in which to rear small children.

9. The Respondent denies the allegations of Section 9 of the Complaint and says that the Complainant proposes to keep her children in the home with her father if she is given the care, custody and control. That it is not a proper and suitable place in which to rear small children; that the home is over-crowded; that the persons who visit in this home are often drunk and use vulgar and obscene language in front of these said children.

10. The Respondent denies the allegations of Section 10 of the Complaint.

11. The Respondent denies the allegations of Section 11 of the Complaint.

12. The Respondent denies the allegations of Section 12 of the Complaint.

Now having fully answered the Complainant's Complaint, the Respondent comes now and files this his Crossbill and respectfully shows unto your Honor as follows:

13. That the Complainant and Respondent are both over the age of twenty-one years and are bona fide resident citizens of Baldwin County, Alabama, and have been for more than one year next preceding the filing of this Crossbill of Complaint.

14. That the Complainant and Respondent were lawfully married to one another on the 1st day of August, 1953, at Follard, Alabama. That there was born to this union two children, Carolyn Elaine McKinley, age six months, and Rita Faye McKinley, age three years.

15. Your Respondent further avers and alleges that the Complainant has been guilty of adultery with John Doe, whose name the Respondent does not wish to further disclose at this time.

16. That on to-wit the 4th day of July, 1957, the Complainant threatened, abused and struck your Respondent about his body and threatened to do further actual violence to his person which would necessarily endanger his life and health. That the conduct of the Complainant was such as to give your Respondent every reasonable apprehension to believe and he does believe that if he continues to live with the Complainant, she will do actual violence to his person which will necessarily endanger his life and health. The Respondent further avers that on other occasions since their marriage, the Complainant attempted to strike him with a large, heavy piece of wood; that he was able to dodge the blow and avers further that had the Complainant been able to carry out her intent, she would have caused him great bodily harm. The Respondent further avers that on several occasions during their married life, the Complainant seized a butcher knife, advanced on him and threatened to cut him with it and your Respondent verily believes the Complainant intended to do him great bodily harm on these occasions.

Your Respondent says further that he has an injured back and suffers from a nervous condition; that this causes him to become nauseated and extremely ill; that on these occasions the Complainant taunts him, makes fun of him and caused him to become more nervous and suffer greatly. That this causes him great bodily harm and endangers his life and health.

17. The Respondent avers that he is a fit and proper person to have the care, custody and control of his minor children; that he maintains a good and Christian home and that a wholesome atmosphere prevails therein. The Respondent avers that the Complainant is not a fit and proper person to have the care, custody and control of the said minor children; that she does not give the children the attention they need; that she proposes to take the children to the home of her parents; that this home is overcrowded; vulgar and obscene language is used therein and in the presence of these children. The Respondent says further that his sister, Mrs. Lucy Belle Stanton is now living in his home; that she is a mature and settled woman and willing to help the Respondent in the care of these children. The Respondent says further that his mother, Mrs. Lucy Belle McKinley and his sister, Mrs. Eugenia Barnes, are both ready, willing and able to assist the Respondent in the care of his minor children.

Wherefore, premises considered, your Respondent prays that your Honor will by proper process make the said Lois Elizebeth McKinley, party cross-respondent to this Crossbill of Complaint and require her to plead, answer or demur to the same within the time and under the penalties prescribed by law.

Premises considered, your cross-complainant prays that on a final hearing of this cause, your Honor will enter a decree granting your cross-complainant a divorce from the cross-respondent and granting him the right to remarry. Your cross-respondent further prays that your Honor will by said decree grant him the permanent care, custody and control of his minor children, Carolyn Elaine McKinley and Rita Faye McKinley. Your Complainant prays for such other, further or different relief to which he may, in Equity, be entitled.

*filed Aug. 10, 1957*

*Alice J. Clark, Register*

Wiltors & Brantley

By:

*James M. Brantley*  
Attorneys for Respondent

4079

LOIS ELIZABETH MCKINLEY

COMPLAINANT

VS

RUBEN F. MCKINLEY

RESPONDENT

IN THE CIRCUIT COURT OF

BAIDWIN COUNTY, ALABAMA

IN EQUITY

ANSWER AND CROSSBILL

FILED

AUG 10 1957

ALICE J. DUCK, Register

Wm. ROY STOKES

ATTORNEY-AT-LAW

PHONE 756

BREWTON, ALABAMA

July 10, 1957

Mrs. Duck  
Circuit Court Clerk  
Baldwin County, Alabama

RE: Lois McKinley vs Reuben McKinley


Dear Mrs. Duck:

Please find enclosed two copies of the Bill of Complaint concerning the above mentioned parties, which I want you to file for me.

I am sorry that I have caused you so much trouble in this matter, but I am sincerely grateful to you for helping me so much.

With my best regards, I remain,

Yours truly,

A handwritten signature in cursive script, reading "Wm. Roy Stokes". The signature is written in dark ink and is positioned above a horizontal line.

Wm. Roy Stokes

STATE OF ALABAMA

BALDWIN COUNTY

LOIS ELIZEBETH MCKINLEY,

COMPLAINANT,

VS.

RUEBEN F. MCKINLEY,

RESPONDENT.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

ON THIS DAY CAME LOIS ELIZEBETH MCKINLEY, and presented unto this court her sworn Bill of Complaint requesting temporary custody of her two (2) minor children, Carolyn Elaine McKinley and Rita Fay McKinley, and upon consideration thereof, IT IS THEREFORE ORDERED AND ADJUDGED that Monday, the 15th day of July, 1957 is the day set for the hearing of the aforesaid requested relief. *9 AM*

The Sheriff is required to forthwith serve a copy of this order upon the said Rueben F. McKinley, the Respondent in this cause.

Given under my hand the 10 day of July, 1957.

*Robert M. Hae*  
CIRCUIT JUDGE

STATE OF ALABAMA    §  
BALDWIN COUNTY       §

LOIS ELIZEBETH MCKINLEY,    §  
COMPLAINANT,               §  
VS.                           §  
RUEBEN F. MCKINLEY,        §  
RESPONDENT.                 §

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY

TO THE HONORABLE HUBERT HALL, Judge of the Circuit Court  
of Baldwin County, Alabama, In Equity Sitting:

Your Complainant, Lois Elizebeth McKinley respectfully  
represents unto Your Honor as follows:

1. That your Complainant is a resident of the City of Bay Minette, Baldwin County, Alabama, and is over the age of twenty-one years; the Respondent, Rueben F. McKinley, is a resident of the City of Bay Minette, Baldwin County, Alabama, and is over the age of twenty-one years.
2. That your Complainant and Respondent were married in the Town of Pollard, Escambia County, Alabama, on the first day of August, 1954,<sup>3</sup> and during the course of their matrimony, two daughters, Carolyn Elaine McKinley, age four months, and Rita Faye McKinley, age three years, were born unto the Complainant and Respondent.
3. Your Complainant further alleges and avers that on or about June 10, 1957, said Respondent began cursing and arguing with the Complainant, and that the Respondent committed actual violence upon the person of the Complainant by striking and pushing her with his hands, knocking her down and during the struggle thereby causing the Complainant to be thrown upon and against a bed, consequently her neck was jerked and made very painful and sore and caused great suffering for several hours, all of which actual violence was attended with danger to the life and health of the said Complainant.
4. That the week next preceding the above mentioned incident, the Complainant was walking away from her house and out into the yard when the Respondent grabbed the Complainant and



gripped and twisted the Complainant's arm and gripped around the Complainant's body with such force and violence upon her person that she was caused much pain and suffering, and such violence was attended with danger to her life or health.

6. Your Complainant further charges that the Respondent has abused and humiliated her for attending a certain denomination of the Christian Church, and on an infinite number of occasions he has cursed her and called her obscene names, on various occasions he has called her a bitch, he has threatened to stamp your Complainant into the ground, and has made such statements as, "I ought to kill you," many times, and from such conduct there is reasonable apprehension that such physical violence endangers the life or health of the Complainant.

7. Your Complainant further avers that she now has the infant child, Carolyn Elaine McKinley, in her custody and control, and that the Respondent now has custody and control of the other minor child, Rita Fay McKinley.

8. That the said Respondent is not a fit person to have the custody and control of the said minor children; that he is habitually rude, profane, vulgar, obscene, and insulting in his language in and about his household.

9. Your Complainant alleges that she is a fit and Christian person, amiable and virtuous, and a proper person to have the custody and control of the said minor children; that she loves them, and that because of their tender years, she can offer them the care and guidance and control which is necessary for children of such tender years.

10. Your Complainant avers that it would be to the best interest, safety and well-being of the said minor children if she be granted the immediate custody and control of the said children, subject to the further orders of this Honorable Court.

11. That there are several articles of household furniture that the Complainant has worked hard for and paid for or partially paid for to which she alleges that she is entitled to have.

12. That the Respondent has denied her the right to enter upon the premises of their homestead and remove her clothing

or even to procure a change of clothing and personal wearing apparel.

WHEREFORE THE PREMISES CONSIDERED, Your Complainant prays as follows, to-wit:

(A) That Your Honor will take jurisdiction of this Bill of Complaint, and that the said Rueben F. McKinley be made a party Respondent to this Bill of Complaint, by appropriate process, in the manner required by law and the rules of this Honorable Court;

(B) That Rueben F. McKinley be required to answer, plead, or demur to this Bill of Complaint within the time required by law and the rules of this Honorable Court.

(C) That the bonds of matrimony presently existing between the Complainant and Respondent be dissolved, and the Complainant be granted the right to again contract marriage within the time prescribed by law, if she so desires.


(D) That Your Honor will grant unto the Complainant the custody of the said minor children, Carolyn Elaine McKinley and Rita Fay McKinley, during the pendency of this litigation, subject to the further orders of this Honorable Court.

(E) That upon the final hearing of this cause, a further order and decree awarding and granting the custody of the said minor children, Carolyn Elaine McKinley and Rita Fay McKinley, to the Complainant.

(F) That the Complainant be awarded a reasonable amount of money, to be paid each month by the Respondent, for the support and maintenance of herself and the two minor children.

(G) That Your Complainant may be granted the right to enter upon the premises of the Complainants and Respondents homestead and secure her clothing which belongs to her and to which she is entitled.

(H) That Your Complainant be granted all such other, further and different relief to which she may be entitled under the pleadings and proof, and that she be granted general relief.



Wm. Roy Stokes

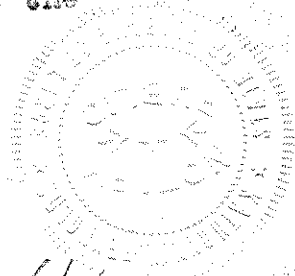
Solicitor for Complainant

STATE OF ALABAMA

Escambia COUNTY

Before me, Kathryn S. Reynolds, a  
Notary Public in and for said county, personally appeared  
Iris McKelley who is known to me and who being by  
me first duly sworn, deposes and says that he has knowledge of  
the facts stated in the above Bill of Complaint and that the  
same are true.

Kathryn S. Reynolds  
NOTARY PUBLIC  
Escambia COUNTY,  
ALABAMA.



LOIS ELIZABETH MCKINLEY  
COMPLAINANT  
VS  
REUBEN F. MCKINLEY  
RESPONDENT

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Ø  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
IN EQUITY  
NO. 4079

RULE TO SHOW CAUSE

This day came Reuben F. McKinley and filed herein his verified petition praying that Lois Elizabeth McKinley be required to appear and show cause, if any she has, why she should not be punished as for contempt in regard to the nature of the thing set out in the verified petition.

And Upon consideration of said petition it is,

ORDERED, ADJUDGED AND DECREED, by the court, that the said Lois Elizabeth McKinley appear before this court at 10 A. M. on the 26 day of November, 1958, in the court room of the Circuit Court of Baldwin County, Alabama, Bay Minette, and show cause, if any she has, why she should not be punished as for contempt. Let a copy of said petition and this rule to show cause be served forthwith, and personally upon Lois Elizabeth McKinley by any sheriff of this State.

Done this 7th day of November, 1958.

Hubert M. Hall  
JUDGE

STATE OF ALABAMA     §  
BALDWIN COUNTY       §

LOIS ELIZEBETH MCKINLEY,     §  
COMPLAINANT,                 §  
VS.                             §  
RUEBEN F. MCKINLEY,         §  
RESPONDENT.                   §

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY

ON THIS DAY CAME LOIS ELIZEBETH MCKINLEY, and presented unto the Court her Bill of Complaint requesting temporary custody of her two (2) minor children, Carolyn Elaine McKinley and Rita Fay McKinley, and upon consideration thereof the Court is of the opinion that she is entitled to that portion of the relief prayed for in said Bill of Complaint.

It is therefore ordered, adjudged and decreed that the said Lois Elizebeth McKinley is hereby awarded the custody of the said two (2) minor children, Carolyn Elaine McKinley, and Rita Fay McKinley, during the pendency of her cause of action and subject to the future orders of this Court.

The Sheriff is required to forthwith serve a copy of this decree upon the said Rueben F. McKinley, the Respondent in this cause.

Given under my hand on this the \_\_\_\_\_ day of \_\_\_\_\_, 1957.

\_\_\_\_\_  
CIRCUIT JUDGE

LOIS ELIZABETH McKINLEY,	X	
Complainant,	X	IN THE CIRCUIT COURT OF
vs.	X	
	X	BALDWIN COUNTY, ALABAMA
REUBEN F. McKINLEY,	X	
Respondent	X	IN EQUITY NO. 4079
	X	

This matter coming on to be heard on the sworn petition of Reuben F. McKinley, the Respondent in the above styled cause, and it appearing to the court that a decree was entered by this Court on September 19, 1957, in said cause awarding the care, custody and control of Carolyn Elaine McKinley and Rita Fay McKinley to the Respondent Reuben F. McKinley and that such order has not been modified or rescinded;

And it further appearing to the Court that the Complainant Lois Elizabeth McKinley is now in contempt of this Court for having willfully taken such children from the custody of the said Reuben F. McKinley and removed them from their home and that she has also taken their minor child, Patti Elizabeth McKinley from their home in this County; it is, therefore

ORDERED and DECREED by the Court that the said Reuben F. McKinley is hereby authorized and directed to take the custody of Carolyn Elaine McKinley, Rita Fay McKinley and Patti Elizabeth McKinley wherever they may be found and return them to their home in Baldwin County, Alabama, subject to further orders and decrees of this Court.

Done this the 27 day of September, 1961.

FILED

SEP 27 1961

ALICE J. DUCK, CLERK  
REGISTER

*Hubert M. Moore*  
Judge

Lois Elizabeth McKinley  
Complainant  
Vs  
Reuben F. McKinley  
Respondent

In the Circuit Court of  
Baldwin County, Alabama  
In Equity. No. 4079

Now comes the Respondent and shows unto the Hon. Alice J. Duck,  
Register as follows;

1.

That on to wit September 27, 1961, Hon. Hubert M. Hall, Judge of said Court signed a decree in said cause, adjudging Lois Elizabeth McKinley in Contempt of Court for taking Carolyn Elaine McKinley and Rita Fay McKinley out of the custody of their father, Reuben F. McKinley, who had their lawful custody under a previous decree therefrom.

2.

That on to wit December 2, 1961, the Respondent made and filed an affidavit with the Honorable Register of said Court, setting out the above facts and praying that the Complainant be taken in custody and held in jail until she produced the above named Carolyn Elaine McKinley and Patti Elizabeth McKinley and delivered them to the lawful custody of their father, the Respondent, under the authority Of Alabama Code, Title 7, Section 330.

3.

That on to wit December 4, 1961, the Sheriff of Baldwin County, Alabama sent to Atmore, in Escambia County and attached her, the Complainant and delivered her person to you, in accord with the petition of the Respondent; that the Complainant asked that she be not held in contempt, but did not offer to deliver the persons of the two minor children; that she has already been held in Contempt by said decree; that she has no lawful status in this court or any other court until she purges herself of contempt and that your Respondent has a lawful right to the processes of the law to have his children delivered to him in accord with this decree; that this right has been violated, in that the Complainant was allowed and permitted to go free without bond or performance of said decree, in violation of the lawful rights of the Respondent.

WHEREFORE, the premises considered, your Respondent prays this Honorable Register that she have taken the immediate custody of the person of Lois Elizabeth McKinley, the Complainant and hold her in jail until she complies with said decree.

State of Alabama  
County of Baldwin

Reuben F. McKinley  
Reuben F. McKinley, Respondent

Before me, the undersigned authority, personally appeared Reuben F. McKinley, who being by me duly sworn deposes and says; that he has read the foregoing affidavit and the facts stated therein are true and correct.

Reuben F. McKinley  
Reuben F. McKinley, Respondent

Subscribed and sworn to before me on this the 5th day of Dec, 1961.

[Signature]  
Notary Public, Baldwin County, Alabama

FILED

DEC 4 1961

ALICE J. DUCK, CLERK  
REGISTER

Lois Elizabeth McKinley  
Complainant  
Vs  
Reuben F. McKinley  
Respondent

In the Circuit Court of  
Baldwin County, Alabama  
In Equity. No. 4079

Now comes the Respondent and shows unto the Hon. Alice J. Duck,  
Register as follows;

1.

That on to wit September 27, 1961, Hon. Hubert M. Hall, Judge  
of said Court signed a decree in said cause, adjudging Lois Eliza-  
beth McKinley in Contempt of Court for taking Carolyn Elaine  
McKinley and Rita Fay McKinley out of the custody of their father,  
Reuben F. McKinley, who had their lawful custody under a previous  
decree therefrom.

2.

That on to wit December 2, 1961, the Respondent made and filed  
an affidavit with the Honorable Register of said Court, setting out  
the above facts and praying that the Complainant be taken in custody  
and held in jail until she produced the above named Carolyn Elaine  
McKinley and Patti Elizabeth McKinley and delivered them to the  
lawful custody of their father, the Respondent, under the authority  
Of Alabama Code, Title 7, Section 330.

3.

That on to wit December 4, 1961, the Sheriff of Baldwin County,  
Alabama sent to Atmore, in Escambia County and attached her, the  
Complainant and delivered her person to you, in accord with the  
petition of the Respondent; that the Complainant asked that she be  
not held in contempt, but did not offer to deliver the persons of  
the two minor children; that she has already been held in Contempt  
by said decree; that she has no lawful status in this court or any  
other court until she purges herself of contempt and that your  
Respondent has a lawful right to the processes of the law to have  
his children delivered to him in accord with this decree; that  
this right has been violated, in that the Complainant was allowed  
and permitted to go free without bond or performance of said decree,  
in violation of the lawful rights of the Respondent.

WHEREFORE, the premises considered, your Respondent prays this  
Honorable Register that she have taken the immediate custody of the  
person of Lois Elizabeth McKinley, the Complainant and hold her in  
jail until she complies with said decree.

Reuben F. McKinley  
Reuben F. McKinley, Respondent

State of Alabama  
County of Baldwin

Before me, the undersigned authority, personally appeared Reuben  
F. McKinley, who being by me duly sworn deposes and says; that he has  
read the foregoing affidavit and the facts stated therein are true  
and correct.

Reuben F. McKinley  
Reuben F. McKinley, Respondent

Subscribed and sworn to before me on this the 27th day of  
Dec, 1961.

James A. Duck  
Notary Public, Baldwin County, Alabama



STATE OF ALABAMA

BALDWIN COUNTY

LOIS ELIZEBETH MCKINLEY,

COMPLAINANT,

VS

RUEBEN F. MCKINLEY,

RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY

Comes now the Respondent in the above styled cause and filed this his answer and crossbill to as much of the Complaint as pertains to the temporary custody of the minor children named therein. He expressly reserves the right to file his further pleading to the remainder of the bill.

1.

The Respondent expressly denies that the Complainant is a suitable and proper person to have custody of the children of the Complainant and the Respondent and says further that the home in which the Complainant is now staying and proposes to keep these children is overcrowded and it is not the proper place in which to rear small children.

2.

The Respondent says that he is a fit and proper person to have custody of his children. That he has a comfortable and Christian home in which to keep them.

PRAYER FOR RELIEF

Premises considered, the Respondent prays that on the hearing to determine temporary custody of his children that the Court will award him custody of Carolyn Elaine McKinley and Rita Faye McKinley, pending the final determination of this cause. Your Respondent prays for such other, further or different relief to which he may be entitled, premises considered.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Tolbert M. Brantley, a Notary Public in and for said County and State personally appeared Rueben F. McKinley, who is known to me and who being by me first duly sworn, deposes and says that he has read the foregoing answer

and crossbill and that the same are true and correct.

*Robert M. Brantley*  
Robert M. Brantley

Sworn to and subscribed before me this the 13 day of July, 1957.

*Robert M. Brantley*  
Robert M. Brantley  
Notary Public, Baldwin County, Ala.

*filed July 15, 1957*  
*Alice J. Luck, Reg.*

Filed  
7-15-57  
Avis  
Register.

REUBEN F. MCKINLEY,  
Respondent.

IN THE  
CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA.  
IN EQUITY  
NO. 4079

This cause coming on to be heard is submitted upon the original bill of complaint filed July 9, 1957, answer of the Respondent filed July 15, 1957, answer and cross bill of the Respondent filed on August 10, 1957, and the testimony of witnesses taken ore tenus.

The Court, after considering the pleadings and the evidence, finds as follows:

1. That the Complainant is not entitled to the relief prayed for in her original bill of complaint.

2. That the Respondent is not entitled to relief under his cross bill insofar as he seeks a divorce. That the Respondent is entitled to relief under his cross bill insofar as it effects the custody, care and control of the two minor children, Carolyn Elaine McKinley and Rita Fay McKinley.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED by the Court that the original bill of complaint on behalf of the Complainant be, and the same is hereby dismissed out of Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Cross Bill on behalf of the Respondent, insofar as it seeks a divorce is hereby dismissed out of Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent be and he is hereby awarded the custody, care and control of the minor children, Carolyn Elaine McKinley and Rita Fay McKinley, with the right of visitation on the part of the Complainant, Lois Elizabeth McKinley, at reasonable

times, and subject to the further orders and decrees of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the costs herein taxed be equally divided between the Complainant and the Respondent, for which execution may issue.

Dated at Bay Minette, Alabama, this 19th day of September, 1957.

*Hubert M. Hale*  
Judge, 28th Judicial Circuit  
of Alabama.

FILED

SEP 19 1957


JOHN L. MOORE, Registrar



from Baldwin County, Alabama, without having first gotten permission from the Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Respondent be, and he is hereby given the right to visit said minor children at all reasonable times.

Dated at Bay Minette, Alabama, this 15th day of July, 1957.

  
Judge of the 28th Judicial  
Circuit of Alabama.

FOR FURTHER INFORMATION, PLEASE REFER TO THE

REPORT OF THE

COMMISSION ON THE

ACTS OF THE

COMMISSION ON THE

ACTS OF THE

1957

4079

RECEIVED  
JUL 16 1957

FILED

JUL 16 1957

WAGE & DUCK, Clerk



LOIS ELIZABETH McKINLEY,	Y	
Complainant,	Y	IN THE CIRCUIT COURT OF
vs.	Y	
	Y	BALDWIN COUNTY, ALABAMA
REUBEN F. McKINLEY,	Y	
Respondent.	Y	IN EQUITY NO. 4079
	Y	

Comes the Respondent in the above styled cause and shows unto this Honorable Court and unto Your Honor as follows:

FIRST:

That under and by virtue of a decree rendered by this Court in the above styled cause on September 19, 1957, the Respondent was granted the custody, care and control of his minor children Carolyn Elaine McKinley and Rita Fay McKinley with the right in the Complainant to visit such children at reasonable times. That such decree reserved jurisdiction of the matter for such other and further orders and decrees as might be rendered therein.

SECOND:

The Respondent further shows unto This Honorable Court that since the date of such decree there has been born of the marriage of the parties to this proceeding a girl, Patti Elizabeth McKinley, age two. That on September 22, 1961, in violation of the terms and conditions of said decree the Complainant removed the children named in the previous decree, together with their sister, Patti Elizabeth McKinley, and she has failed to return them to the home of the Respondent. That the Complainant is in contempt of this Court for her removal of such children and her failure to return them.

WHEREFORE, the Respondent prays that an order be made and entered by this Court granting unto the Respondent the custody, care and control of Patti Elizabeth McKinley and that your Respondent be authorized to take such children wherever they may be found and return them to their home in this County.

Your Respondent prays for such other, further and different relief to which he may be entitled.

Reuben F. McKinley  
Respondent

STATE OF ALABAMA

BALDWIN COUNTY

Before me, James H. Lindsey, a Notary Public, in and for said County in said State, personally appeared Reuben F. McKinley who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That his name is Reuben F. McKinley; that he is the Respondent in the foregoing petition and all of the matters and facts alleged therein are true and correct.

Reuben F. McKinley

Sworn to and subscribed before me on this  
the 27<sup>th</sup> day of September, 1961.

James H. Lindsey  
Notary Public, Baldwin County, Alabama

FILED

SEP 27 1961

ALICE J. DUCK, CLERK  
REGISTER