

4416

State of Alabama
County of Baldwin

To any Sheriff of the State of Alabama:

You are hereby commanded to summon Lois Elizabeth McKinley to appear and plead, answer or demur within thirty days to the Bill of Complaint filed in the Circuit Court of said County by Reuben F. McKinley as Complainant and against Lois Elizabeth McKinley as Respondent.

Witness my hand, this _____ day of _____ 1958.

Register

~~XXXXXXXXXXXXXXXXXXXX~~
Reuben F. McKinley
Complainant
Vs
Lois Elizabeth McKinley
Respondent

XXXXXXXXXXXXXXXXXXXX

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

To Hon. Hubert M. Hall, Judge of the Circuit Court of Baldwin County, Alabama, In Equity;

Your Complainant, Reuben F. McKinley, respectfully represents unto Your Honor and this Honorable Court, as follows;

1.

Your Complainant and Respondent married on to wit, August 1, 1953 and lived together until on to wit, August 2, 1958, when they seperated because of the cruelty of the Respondent.

2.

Your Complainant is a bona fide resident of Baldwin County, ~~Alabama~~ Alabama and is over the age of twenty one years; The Respondent is over the age of twenty one years and her residence is unknown.

3.

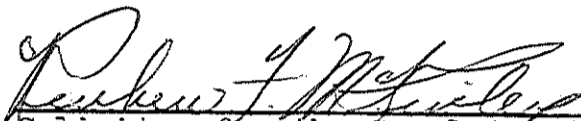
That on to wit July 31, 1958, the Respondent did run at the Complainant with a long butcher knife, when his back was half turned to her and she was only prevented from stabbing the Complainant by the Complainant picking up a chair and holding it between them, then dodging around the chair, grabbing the Respondent's arm and taking the butcher knife away from her. That on to wit August 2, 1958, the Respondent did, as she had done on several occasions prior thereto, threaten and abuse the Complainant, threaten to do violence to his person and actually did do violence to his person, which would necessarily endanger his life and health. The conduct of the Respondent was such that it gave the Complainant reasonable apprehension to believe and he did actually believe that if he continued to live with her, that she would carry out her threats and do actual violence to his person which would necessarily endanger his life and health.

4.

That there are two children as fruits of this marriage, Rita Fay McKinley, age about 3 1/2 years and Carolyn Elaine McKinley, age about 1 1/2 years; that this Honorable court has heretofore granted custody of said children to the Complainant by decree dated September 19, 1957, said decree being certified, verified and brought up to date on to wit September 2, 1958; that the Respondent on to wit August 2, 1958, in contempt of this Honorable court and in violation of its decree did steal and remove said minor children from the custody of the Complainant and take them to the State of California, not notifying the Complainant where they were, causing your Complainant a great amount of time, trouble and expense to locate them; that at this time she has removed said children from the place where they had been living, leaving no address; that the Complainant is a fit and proper person to have the care custody and control of said minor children and the Respondent is not.

Wherefore, the premises considered, your Complainant prays that Your Honor will by proper procedure make the said Lois Elizabeth McKinley Party Respondent to this Bill of Complaint, requiring her to plead, answer or demur to the same and within the time required by law and the practices of this Honorable Court;

Your Complainant further prays that upon a final hearing hereof, Your Honor will grant to him an absolute divorce, forever barring the bonds of matrimony existing between the Complainant and the Respondent; that your Honor will make a decree that the Respondent be taken into custody, wherever she may be found for violation of said decree of this Honorable Court and that the custody of said minor children be returned to your Complainant and your Complainant prays for such other, further, different or general relief as he may be in Equity and good conscience entitled to receive.


Solicitor for the Complainant

Reuben F. McKinley
Complainant

Vs

Lois Elizabeth McKinley
Respondent

Amended and substituted
Complaint

FILED
NOV 13 1958
ALICE J. DUCK, CLERK
REGISTER

CLERK OF COURT
COURT HOUSE
COLUMBIA, MISSISSIPPI
RECEIVED
NOV 13 1958
FILED
ALICE J. DUCK, CLERK
REGISTER

Affidavit of Non Residence

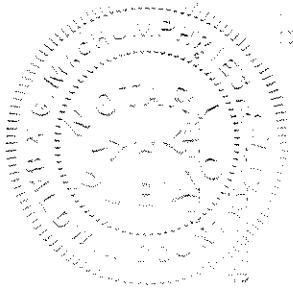
State of Alabama
County of Baldwin

To whom it may concern:

This is to certify that I, Reuben F. McKinley, am the Complainant in this cause and that Lois Elizabeth McKinley, the Respondent was my wife until on to wit August 2, 1958, when we seperated because of the Cruelty of the Respondent. The Respondent is now a non resident of the State of Alabama and her present address is unknown to me.

Reuben F. McKinley

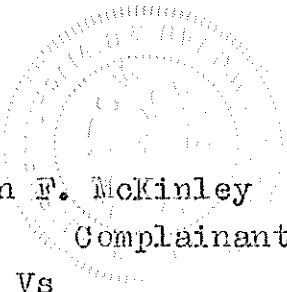
Subscribed and sworn to before me on this the 3rd day of November 1958.



[Signature]
Notary Public, Baldwin County, Alabama.

cc. file 10-1-11-1111

REUBEN F. MCKINLEY
COMPLAINANT
VS
LOIS ELIZABETH MCKINLEY
RESPONDENT



Reuben F. McKinley
Complainant

Vs

Lois Elizabeth McKinley
Respondent

Affidavit of Non Residence

FILED
NOV 13 1958
ALICE J. DUCK, CLERK
REGISTER

NOTICE TO NON-RESIDENT

The Baldwin Times, Bay Minette, Alabama

REUBEN F. MCKINLEY

No. 4416

vs.

LOIS ELIZABETH MCKINLEY

The State of Alabama,

BALDWIN County.

Circuit Court, in Equity

This the 3rd day of

November, 19~~4~~58

In this cause it being made to appear to the Clerk of this Court by the affidavit of

REUBEN F. MCKINLEY

that the Defendant LOIS ELIZABETH MCKINLEY

is a non-resident of the State of Alabama

and further, that, in the belief of said Affiant the Defendant LOIS ELIZABETH MCKINLEY over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring

LOIS ELIZABETH MCKINLEY the said Defendant

to answer or demur to the Bill of Complaint in this cause by the 3rd day of December 19~~4~~58 or after thirty days therefrom a decree Pro Confesso may be taken against LOIS ELIZABETH MCKINLEY

W. J. ...
Register.