



have the care, custody and control of the said minor Wanda Sue Quinley.

IV

Your Complainant further avers that the Respondent owns the following described real property located in Baldwin County, Alabama, to-wit:

Lot Four (4) in Block 178, Hand Land Company Addition to Bay Minette, Alabama.....Recorded Map in Deed Book N.S. 4, pages 158 et seq.

Your Complainant further avers that the Complainant and the Respondent owns jointly all of their household furnishings and one 1955 Oldsmobile, Serial No. 557A19962.

V

That the Respondent is employed by the Town of Bay Minette, Alabama, as Superintendent of the Gas and Waters Works, and earns an average salary of Four Hundred (\$400.00) Dollars per month; that he has <sup>no</sup> income from the above described property, but that the Complainant has reason to believe that the Respondent owns a Farm three (3) miles South of Bay Minette, on Highway thirty-one (31); that he raises live stock and derives income from the said farm and live stock.

That the Respondent also makes approximately Seventy-Five (\$75.00) Dollars, per month salary from the United Gas Company. The Respondent is capable of supporting the Complainant and the heretofore mentioned minor child.

VI

That your Complainant and the Respondent had a joint checking account in the Baldwin County Bank of approximately Twenty Five Hundred (\$2500.00) Dollars, that the Respondent has withdrawn all but approximately Seven Hundred (\$700.00) Dollars of the said account and has bought the said heretofore named Nora Ganey one 1957 Ford Automobile. That your Complainant is now in possession of the 1955 Oldsmobile automobile, and that it is her only means of transportation to carry the said heretofore named minor child back and forth to school, and is the only transportation that she has to carry on her duties of her household.

VII

That your Complainant does not have the funds to pay a Solicitor for the prosecution of this suit. That the Respondent is an able bodied man, capable of supporting your Complainant and her heretofore mentioned minor child and paying her Solicitor's fees, and that your Complainant has no real or personal property sufficient to properly support her according to her station in life.

PRAYER FOR PROCESS AND RELIEF

WHEREFORE, the premises considered, your Complainant prays that the Respondent, Thomas Henry Quinley, be made a party Respondent to this cause by the usual writ of process of this Honorable Court requiring him to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Honorable Court and the statutes in such cases made and provided.

Complainant further prays that upon a final hearing of this cause that your Honor will grant unto your Complainant an absolute divorce from the said Respondent.

Your Complainant further prays that this Court will award to her the Home in which she and her said minor child, Wanda Sue Quinley, are now living and that the Court will award to her the said 1955 Oldsmobile Automobile as a part of the marriage property, and that upon a final hearing hereof, the Court will ascertain a suitable amount of support to be paid by the Respondent for the support of the said heretofore mentioned minor, and order him to pay the same.

Your Complainant further prays that this Court will ascertain and fix a suitable amount of Alimony for your Complainant, and order the Respondent to pay the same.

Your Complainant further prays that upon a final hearing hereof, that this Court will fix a reasonable Solicitor's fee to be paid to John V. Duck, as Solicitor for the Complainant for his services in this matter, and order that the same be paid by the Respondent.

Your Complainant further prays that this Court will also decree that the Complainant be allowed to remarry if she sees fit.

Your Complainant further prays for such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.

Adelle Quinley  
Complainant

John D. Duck  
Solicitor for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Adelle Quinley, who being duly sworn, says on oath that the facts stated in the foregoing Bill of Complaint are true and correct.

Adelle Quinley  
Adelle Quinley

Sworn to and subscribed before me  
on this the 23<sup>rd</sup> day of September,  
1959.

Raymond L. Tomney  
Notary Public

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,  
Baldwin County.

Circuit Court, Baldwin County

No. ....

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon THOMAS HENRY QUINLEY

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

THOMAS HENRY QUINLEY, Defendant

by \_\_\_\_\_

ADELLE QUINLEY, Plaintiff

Witness my hand this 23 day of Sept 1959

Alvin J. Lewis, Clerk

No. 4713 Page \_\_\_\_\_

The State of Alabama  
Baldwin County

CIRCUIT COURT

ADELLE QUINLEY

Plaintiffs

vs.

THOMAS HENRY QUINLEY

Defendants

Summons and Complaint

Filed 9 22 1959

Beise J. Luck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Bay Minette, Alabama

Received In Office

Sept. 23 1959

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

I have executed this summons

this Sept 25 1959

by leaving a copy with

Thomas Henry Quinley

Taylor Wilkinson Sheriff

W. A. Albert Deputy Sheriff

O. Medley

JOHN V. DUCK  
ATTORNEY AT LAW  
FAIRHOPE, ALA.

Sept. 22nd, 1959

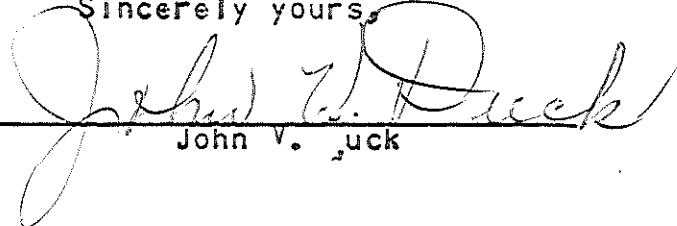
Mrs. Alice J. Duck  
Clerk of Circuit Court  
Bay Minette, Ala.

Dear Miss. Alice:

Please accept this Bill of Complaint from  
Mr. Watts. File and deliver to Sheriff.

JVD:oq  
Encl:  
Complaint

Sincerely yours,

  
John V. Duck