

4811

ELLIS KINSEY,	⌘	
Complainant,	⌘	IN THE CIRCUIT COURT OF
Vs.	⌘	BALDWIN COUNTY, ALABAMA
JANE GAFFORD KINSEY,	⌘	IN EQUITY
Respondent.	⌘	CASE NO. 4811

DEMURRER

Comes now the Respondent in the above styled cause and demurs to the Petition to Modify a divorce decree and for changing of custody, and for grounds thereof says:

1.

There is no Equity in the Petition.

2.

That the Petition does not allege any material change of conditions and circumstances which would justify the Court in changing the custody of the said child, Pamela E. Kinsey.

WILTERS & BRANTLEY

BY: *[Signature]*
Attorney for Respondent

FILED

AUG 8 1962

ALICE J. DUCK, CLERK REGISTER

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

ELLIS KINSEY

Complainant

vs.

JANE GAFFORD KINSEY

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Defect of Parties Job~~ Waiver and Answer 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 ELLIS KINSEY is forever divorced from the said JANE GAFFORD KINSEY for and on account of

cruelty; the separation agreement providing for custody, control and support of the minor children is hereby approved and incorporated as a part of this decree; the Order of this Court vesting temporary custody and control of John Ellis Kinsey in the Complainant is hereby dissolved.

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 payment of the cost of this suit.

It is further ordered that Ellis Kinsey the Complainant pay the cost herein to be taxed, for which executed may issue.

This 6th day of January 1960

Robert M. Steel

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. 1811 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

ELLIS KINSEY

Complainant

vs.

JANE GAFFORD KINSEY

Respondent

DIVORCE DECREE

FILED

JAN 6 1960

ALICE J. DUCK, Register

SEPARATION AGREEMENT

STATE OF ALABAMA }
COUNTY OF BALDWIN }

This separation agreement, made and entered into in duplicate, by and between ELLIS KINSEY, herein called husband, and JANE GAFFORD KINSEY, herein called wife, WITNESSETH:

WHEREAS, the parties were married in February, 1957, and

WHEREAS, serious differences have arisen between the parties hereto rendering it impossible for them longer to live together as husband and wife, and by reason thereof they have separated on October 18, 1959, and are now living separate and apart; and

WHEREAS, it is the desire of the parties hereto to settle and adjust the matter of custody of the minors born of this marriage, NOW, THEREFORE, this agreement is made as follows:

1. The wife shall have full care, custody and control of the minor child, Pamela E. Kinsey; and Ernest Kinsey, the grandfather of the minor child, John Ellis Kinsey, shall have the care, custody and control of said minor child during Ernest Kinsey's natural life but upon his death Jane Gafford Kinsey shall have the care, custody and control of said John Ellis Kinsey. Both parents shall have full and reasonable visitation privileges.

2. It is further agreed that the terms of this agreement may be incorporated in any decree of divorce which may be hereafter obtained by either party, or will continue until reconciliation.

3. The husband shall pay all medical expenses incurred by the minor child, Pamela E. Kinsey, and shall pay the wife \$5.00 per week beginning immediately for the support of the said Pamela E. Kinsey.

DONE this the 18th day of November, 1959.

Ellis Kinsey

ELLIS KINSEY
Jane Gafford Kinsey

JANE GAFFORD KINSEY

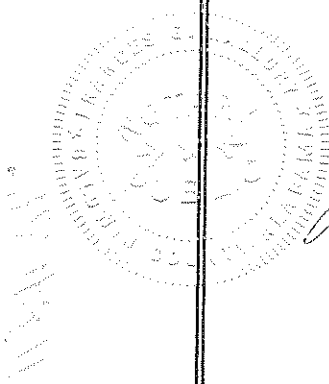
STATE OF ALABAMA)

COUNTY OF BALDWIN)

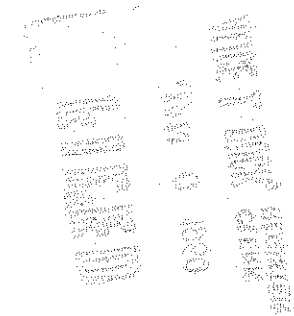
I, the undersigned, a Notary Public in and for said County and State, do hereby certify that Ellis Kinsey and Jane Gafford Kinsey, whose names are signed to the foregoing instrument, and who are known to me, acknowledged before me on this day that, being informed of the contents of said instrument, they executed the same voluntarily on the day the same bears date.

Given under my hand and official seal this the 18th day of November, 1959.

Francis G. Mallory
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA



*Filed
Jan - 6, 1960*



ELLIS KINSEY,

COMPLAINANT

vs.

JANE GAFFORD KINSEY,

RESPONDENT

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, and
testimony by deposition

and in behalf of Defendant upon waiver and answer

Alice J. Duck

Register.

Solicitor for Complainant

No. 4811

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

ELLIS KINSEY,
COMPLAINANT

vs.

JANE GAFFORD KINSEY,
RESPONDENT.

NOTE OF TESTIMONY

Filed in Open Court **FILED**

day of JAN 3 1960, 194

ALICE J. DUCK CLERK
REGISTER Register.

ELLIS KINSEY,
COMPLAINANT
VS
JANE GAFFORD KINSEY,
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

PETITION TO MODIFY CHILD CUSTODY AWARD

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

Your Petitioner, Ellis Kinsey, represents and shows unto your Honor and unto this Court as follows:

1. That your Petitioner and the Respondent as named above, are both adults and are both still bona fide residents of Baldwin County, Alabama; that heretofore, to-wit: in November 1959, in this cause then pending in the Circuit Court of Baldwin County, Alabama, your Petitioner was Complainant and Respondent was Respondent, and Petitioner obtained a divorce which decree was made and entered upon the records of this Court; that said divorce decree incorporated a separation agreement executed by and between the parties, whereby and wherein the care, custody and control of the minor child, Pamela E. Kinsey, was awarded to the Respondent, subject to the full and reasonable visitation privilege of the Complainant, your Petitioner.
2. That subsequent to the said decree, your Petitioner married another party, and is still married and maintaining a home northeast of Foley, Alabama.
3. That since the decree above mentioned was made and entered conditions surrounding said minor, Pamela E. Kinsey, have materially changed and that such changed conditions and circumstances render it advisable and necessary that the provisions for the custody and control of said minor child be reviewed by this Court, and that such decree pertaining to the custody and control of said child be set aside and that the Court alter such decree and enter a new decree herein, granting to Plaintiff the full and absolute custody and control of said child; such action will be to the best interest of said child; that the Respondent, by and through her actions and habits, is exerting a harmful influence on the said minor child;

is failing to properly care and provide for said child; and by her conduct has shown herself to be an unfit custodian of said minor child; that such conditions will continue unless this Court sets aside the former decree and grants the full custody and control of said child to Petitioner; that these facts were impossible to ascertain at the time of the entry of said former decree which incorporated the aforesaid separation agreement.

WHEREFORE, THE PREMISES CONSIDERED, your Petitioner prays that the Respondent be made a party to this Bill of Complaint seeking amendment of the prior decree and prays that the process of the Court be directed to her according to law requiring her to plead, answer or demur to this petition within the time required by law and the rulings of this Honorable Court; that upon a final hearing of this cause your Honor will amend the aforesaid decree, and will award the absolute control and custody of said minor child, Pamela E. Kinsey, to your Complainant and Petitioner; and Complainant and Petitioner prays that your Honor will in all other respects affirm and approve the aforesaid decree of this Court; and Complainant prays for such other, further and general relief as to which he may be entitled, the pleadings and evidence considered, as he will ever pray.

Ellis Kinsey
Complainant

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Before me, the undersigned Notary Public in and for said State and County, personally appeared Ellis Kinsey, who being first duly sworn, deposes and says: that he is Complainant in the above and foregoing Bill of Complaint, and the things and matters contained therein are true.

Further deponent saith not.

Sworn to and subscribed
before me this 23rd day of
June 1952

Virgie E. Johnson
Notary Public, Baldwin County, Ala.

Ellis Kinsey
Ellis Kinsey

SUMMONS AND COMPLAINT

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.

..... TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA

You Are Commanded to Summon Jane Gafford Kinsey

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

Jane Gafford Kinsey....., Defendant.....

by, Plaintiff.....
Ellis Kinsey....., Plaintiff.....

Witness my hand this 2 day of July 1962

Alice J. Duke....., Clerk

STATE of ALABAMA

Baldwin County

CIRCUIT COURT

Ellis Kinsey

Plaintiffs

vs.

Jane Gafford Kinsey

Residing in Foley

Defendants

Summons and Complaint

Filed _____ 19__

FILED
JUL 9 1962

Clerk

ALICE L. DUCK
CLERK
REGISTER

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Jane S. Kinsey
Fairhope, Alabama

Received In Office

7-2, 1962

Sheriff.

I have executed this summons

this *July 18th* 19*62*

by leaving a copy with

Jane Gafford Kinsey

Sheriff claims *80* miles at

Ten Cents per mile Total \$ *8.00*

TAYLOR WILKINS, Sheriff

BY *Richard*
DEPUTY SHERIFF

Taylor Wilkins

Sheriff.

Zeel Seibert

Deputy Sheriff.

5 mi. So. Foley

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

ELLIS KINSEY

Complainant

VS.

JANE GAFFORD KINSEY

Respondent

I, VERA DANIELS

as Register and Commissioner

have called and caused to come before me ELLIS KINSEY

witness named in the Requirement for Oral Examination, on the 4th day of January 1960, at the office of JAMES A. BRICE, ATTORNEY AT LAW in FOLEY, Alabama, and having first sworn said Witness to speak the truth, the whole truth, and nothing but the truth, the said ELLIS KINSEY doth depose and say as follows:

My name is Ellis Kinsey. I am the Complainant in the divorce action now pending in this Court wherein Jane Gafford Kinsey is the Respondent. The Respondent and I were married in Bay Minette, Alabama on February 16, 1957. We have two children, John Ellis Kinsey and Pamela Kinsey, both minors; we have entered into an agreement providing for the custody and support of these children and I believe it is a fair agreement and is in the best interest of the children; all through our marriage we have argued and fought; my wife has an uncontrollable temper and she flies into rages without being provoked. On October 17, 1959, she flew into a rage without any justification and scratched me about the face and eyes, kicked me in the shins, and bit me on the left forearm. Immediately after this, she left our home and returned only once to pick up her clothing. I did not strike her back.

Further deponent saith not.

Ellis Kinsey
ELLIS KINSEY

ORAL EXAMINATION.

I, VERA DANIELS, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness _____ and read over to him and he signed the same in the presence of myself and James A. Brice at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness _____ or had proom made before me of the identity of said witness _____; that I am not of counsel or 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 4th day of January, 1960

Vera Daniels (L. S.)

NO. 4811

PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

ELLIS KINSEY

vs. Complainant

JANE GAFFORD KINSEY

Respondent.

Oral Deposition

Filed

FILED

, 1960

Register.

Alice J. Duck Clerk
Register in

Record

Vol. _____

Page _____

Register

ELLIS KINSEY,)	IN THE CIRCUIT COURT OF
COMPLAINANT,)	BALDWIN COUNTY, ALABAMA
VS.)	IN EQUITY.
JANE GAFFORD KINSEY,)	
RESPONDENT.)	

BILL OF COMPLAINT

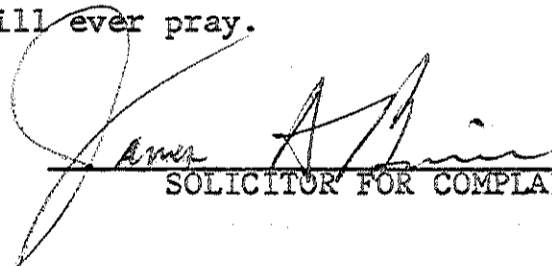
TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Your Complainant, Ellis Kinsey, represents and shows unto your Honor:

1. That Complainant is a bona fide adult resident citizen of Baldwin County, Alabama, and has been such for one year next preceeding the filing of this cause; that the Respondent is a bona fide resident citizen of Baldwin County, Alabama and has been such for more than one year next preceeding the filing of this cause.
2. That the Complainant and Respondent were lawfully married to each other on February 16, 1957 in Bay Minette, Alabama, and that there have been two (2) children born of this marriage namely, John Ellis Kinsey and Pamela Kinsey, both minors.
3. That Complainant and Respondent have entered into a separation agreement providing for the custody and control of said minor children and for their support; that said agreement is just and equitable and is in the best interest of said minor children.
4. That heretofore on or about the 17th day of October, 1959, the Respondent without cause or justification at the home of the parties kicked, scratched and bit the Complainant about the face, head and body inflicting bruises and injuries upon the Complainant attended with great danger to his health and life; and from her manner and conduct toward him that she will commit further actual physical violence upon his person attended with danger to his health and life; that on the same day, to-wit: the 17th day of October, 1959, the Respondent voluntarily left the home of the parties and the parties have not lived together since as husband and wife.

WHEREFORE, THE PREMISES CONSIDERED, your Complainant prays that the Respondent be made a party to this Bill of Complainant and prays that the process of this Court be directed to her according to law requiring her to plead, answer or demur to this Bill of Complaint within the time required by law and the rulings of this Honorable Court; that upon a final hearing of this cause your Honor will grant complainant an absolute divorce from Respondent and that your Honor will award the Respondent the full, complete, and entire custody and control of Pamela Kinsey with rights of visitation to the complainant, and will award the custody and control of John Ellis Kinsey to his grandfather, Ernest Kinsey during the minority of said child while the said Ernest Kinsey is alive, but with reversionary custody to be vested in the Respondent with reasonable rights of visitation granted the Complainant; and Complainant prays that your Honor will approve said separation agreement as to its support aspects; and Complainant prays that your Honor will revoke and dissolve the prior decree of the Court awarding the temporary custody and control of John Ellis Kinsey to the Complainant; and Complainant prays for such other, further and general relief as to which he may be entitled, pleadings and evidence considered, as he will ever pray.

*Filed
Jan. 6, 1960*


SOLICITOR FOR COMPLAINANT

ELLIS KINSEY,)
 COMPLAINANT,)
 VS.)
 JANE GAFFORD KINSEY,)
 RESPONDENT.)

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

Comes the Respondent in the above styled cause and accepts service of a Bill of Complaint filed heretofore in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree.

And for answer to the Bill of Complaint heretofore filed in this cause, Respondent says:

1. She admits the allegations contained in Paragraph 1 of said Bill of Complaint.
2. She admits the allegations contained in Paragraph 2 of said Bill of Complaint.
3. She admits the allegations contained in Paragraph 3 of said Bill of Complaint.
4. She denies each and every allegation contained in Paragraph 4 of said Bill of Complaint and demands strict proof thereof.

DATED this 18th day of November, 1959.

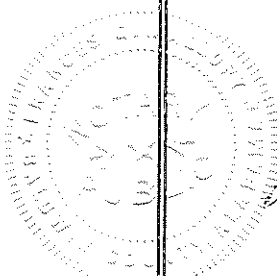
Jane Gafford Kinsey
 RESPONDENT

STATE OF ALABAMA)
 COUNTY OF BALDWIN)

I, the undersigned, a Notary Public in and for said County and State, do hereby certify that Jane Gafford Kinsey, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of said instrument, she executed the same voluntarily on the day the same bears date.

Given under my hand and official seal this the 18th day of November, 1959.

James S. Mallory
 NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA



*Filed
 Jan 6, 1960*

ELLIS KINSEY,)	IN THE CIRCUIT COURT OF
COMPLAINANT,)	BALDWIN COUNTY, ALABAMA
VS.)	IN EQUITY.
JANE GAFFORD KINSEY,)	
RESPONDENT.)	

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT SITTING IN EQUITY:

Your Complainant, Ellis Kinsey, respectfully represents and shows unto your Honor:

1. That the Complainant and Respondent are both resident citizens of Baldwin County, Alabama, and have been such for more than three (3) years next preceeding the filing of this Bill of Complaint.

2. That your Complainant and Respondent were lawfully married at Bay Minette, Alabama, in February, 1957.

That two (2) children, John Ellis Kinsey, age 2, and Pamela E. Kinsey, one month old, have been born of said marriage.

3. That on the 18th day of October, 1959, the Respondent without cause or justification separated from and abandoned your Complainant, taking with her the youngest child Pamela E. Kinsey; that the older child, John Ellis Kinsey, is presently in the care and custody of your Complainant; that the Respondent has failed and refused to return to the bed and board of your Complainant after repeated entreaties on his part; that good and sufficient grounds exist for a divorce by the Complainant from the Respondent, but your Complainant has no desire to instigate proceedings for a divorce until he is finally convinced that a reconciliation is impossible.

4. That it is to the best interest to the minor child, John Ellis Kinsey, to remain in the custody of the Complainant pending a divorce or reconciliation.

THE PREMISES CONSIDERED, your Complainant makes the said Jane Gafford Kinsey a party respondent to this Bill of Complaint; and that pending a final hearing in this cause, that your Honor will

enters a decree under the provisions of Section 35 of Title 34, Code of Alabama 1940, awarding temporary custody and control of John Ellis Kinsey to the Complainant; and that your Honor will grant such other, further and different relief as may seem just and proper as your Complainant would ever pray.

E. M. Kinsey

ELLIS KINSEY

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Before me, the undersigned, a Notary Public in and for said County in said State, personally appeared Ellis Kinsey, who, after being by me first duly and legally sworn, deposes and says that the matters and facts set out in the foregoing petition are true.

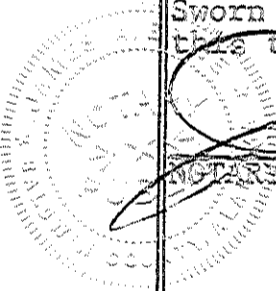
E. M. Kinsey

ELLIS KINSEY

Sworn to and subscribed before me on
this the 21st day of October, 1959.

James A. Brown

NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA



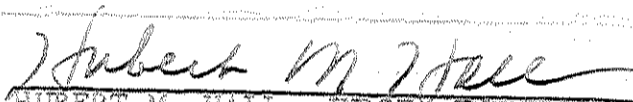
ELLIS KINSEY,
COMPLAINANT,
VS.
JANE GAFFORD KINSEY,
RESPONDENT.

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

This cause being submitted to the Court upon petition of Ellis Kinsey which prayed for an order awarding the temporary custody and control of John Ellis Kinsey, a minor child, to Ellis Kinsey, pending a final hearing in this cause, and the Court being of the opinion that the same should be granted.

IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED by the Court that the custody and control of John Ellis Kinsey is awarded to the father, Ellis Kinsey, pending a hearing hereon.

DONE this the 22 day of October, 1959.


HUBERT M. HALL, JUDGE, TWENTY-EIGHTH
JUDICIAL CIRCUIT, in EQUITY

SUMMONS AND COMPLAINT

Baldwin Times

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 JANE GAFFORD KINSEY

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 JANE GAFFORD KINSEY, Defendant

by ELLIS KINSEY

....., Plaintiff.....

Witness my hand this 21 day of OCTOBER 1959.

Ellis Kinsey, Clerk

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

ELLIS KINSEY

Plaintiffs

vs.

JANE GAFFORD KINSEY

Defendants

SUMMONS and COMPLAINT

Filed, 19.....

....., Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

10/22, 1959

....., Sheriff

I have executed this summons

this, 19.....

by leaving a copy with

Not found

Returned 2 day of Dec 1959
Not found in my county after diligent search and inquiry.

Taylor Wilkins, Sheriff

By [Signature]
Deputy Sheriff

..... Sheriff

..... Deputy Sheriff

ELLIS KINSEY,)	IN THE CIRCUIT COURT OF
COMPLAINANT,)	BALDWIN COUNTY, ALABAMA
VS.)	IN EQUITY.
JANE GAFFORD KINSEY,)	
RESPONDENT.)	

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT SITTING IN EQUITY:

Your Complainant, Ellis Kinsey, respectfully represents and shows unto your Honor:

1. That the Complainant and Respondent are both resident citizens of Baldwin County, Alabama, and have been such for more than three (3) years next preceeding the filing of this Bill of Complaint.

2. That your Complainant and Respondent were lawfully married at Bay Minette, Alabama, in February, 1957.

That two (2) children, John Ellis Kinsey, age 2, and Pamela E. Kinsey, one month old, have been born of said marriage.

3. That on the 18th day of October, 1959, the Respondent without cause or justification separated from and abandoned your Complainant, taking with her the youngest child Pamela E. Kinsey; that the older child, John Ellis Kinsey, is presently in the care and custody of your Complainant; that the Respondent has failed and refused to return to the bed and board of your Complainant after repeated entreaties on his part; that good and sufficient grounds exist for a divorce by the Complainant from the Respondent, but your Complainant has no desire to instigate proceedings for a divorce until he is finally convinced that a reconciliation is impossible.

4. That it is to the best interest to the minor child, John Ellis Kinsey, to remain in the custody of the Complainant pending a divorce or reconciliation.

THE PREMISES CONSIDERED, your Complainant makes the said Jane Gafford Kinsey a party respondent to this Bill of Complaint; and that pending a final hearing in this cause, that your Honor will

enters a decree under the provisions of Section 35 of Title 34; Code of Alabama 1940, awarding temporary custody and control of John Ellis Kinsey to the Complainant; and that your Honor will grant such other, further and different relief as may seem just and proper as your Complainant would ever pray.

Ellis Kinsey
ELLIS KINSEY

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Before me, the undersigned, a Notary Public in and for said County in said State, personally appeared Ellis Kinsey, who, after being by me first duly and legally sworn, deposes and says that the matters and facts set out in the foregoing petition are true.

Ellis Kinsey
ELLIS KINSEY

Sworn to and subscribed before me on this the 21st day of October, 1959.

James A. [Signature]
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

ELLIS KINSEY,
COMPLAINANT,
VS.
JANE GAFFORD KINSEY,
RESPONDENT.

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

This cause being submitted to the Court upon petition of Ellis Kinsey which prayed for an order awarding the temporary custody and control of John Ellis Kinsey, a minor child, to Ellis Kinsey, pending a final hearing in this cause, and the Court being of the opinion that the same should be granted.

IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED by the Court that the custody and control of John Ellis Kinsey is awarded to the father, Ellis Kinsey, pending a hearing hereon.

DONE this the 22nd day of October, 1959.

Hubert M. Hall
HUBERT M. HALL, JUDGE, TWENTY-EIGHTH
JUDICIAL CIRCUIT, 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 JANE GAFFORD KINSEY

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 JANE GAFFORD

KINSEY

....., Defendant

by ELLIS KINSEY

....., Plaintiff.....

Witness my hand this

21

day of

OCTOBER

19...59..

Alice J. Duck
....., Clerk

No. 4741

Page

**THE STATE OF ALABAMA
BALDWIN COUNTY**

CIRCUIT COURT

ELLIS KINSEY

Plaintiffs

vs.

JANE GAFFORD KINSEY

Defendants

SUMMONS and COMPLAINT

Filed, 19.....

....., Clerk

1187

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

..... Sheriff

..... Deputy Sheriff