

11873

IN THE CIRCUIT COURT OF) BERYL DENE MCNEIL,)

BALDWIN COUNTY, ALABAMA) COMPLAINANT,)

IN EQUITY) VS.)

MAURICE WAYNE MCNEIL,)

RESPONDENT.)

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

Your Complainant, Beryl Dene McNeil, respectfully represents and shows unto your Honor:

1. That the Complainant and Respondent are both residents citizens of Baldwin County, Alabama, and have been such for more than two (2) years next preceding the filing of this Bill of Complaint.

2. That your Complainant and Respondent were lawfully married at Mattoon, Illinois, on October 27, 1956. That one (1) child, Connie Christine McNeil, age one year old, has been born of said marriage.

3. That heretofore, on the 24th day of December, 1959, at the residence of Kermit Blackmon, at or near Foley, Alabama, the Respondent, without cause or justification, in the presence of reliable witnesses struck and slapped the Complainant in and about the face, knocked her against a wall, inflicting bruises and injuries upon her, attended with great danger to her health and life; and from his manner and conduct toward her, she feels that the Respondent will commit further actual physical violence upon her person attended with danger to her health and life; that she has separated from the Respondent and the parties are not now living together as husband and wife.

4. The Complainant further alleges that the Respondent is gainfully employed by the Pace-Holland Company, Robertsdale, Alabama, earning a salary of about \$50.00 per week and that he is fully capable of providing some manner of support for the minor child of the marriage.

WHEREFORE, THE PREMISES CONSIDERED, your Complainant prays

that the Respondent be made a party to this cause and prays that

the process of this Court be directed to him according to law,

requiring him 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 your Complainant an absolute divorce from the Respondent

and will award your Complainant the full, complete, and entire

custody and control of Connie Christine McNeil, subject to rights

of reasonable visitation in the home of the Complainant by the

Respondent; and Complainant prays that your Honor will order and

decree that the Respondent pay to the Complainant each week here-

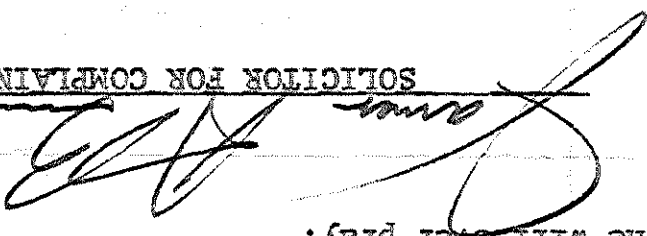
after the sum of Ten and No/100 (\$10.00) Dollars for the support

of said minor child; and Complainant prays for such other, further

and general relief as to which she may be entitled, pleadings and

evidence considered, as she will ever pray.

~~SOLICITOR FOR COMPLAINANT~~



The Respondent resides two (2) doors from

Arthur John Rich, Foley, Alabama, and is

employed at Face-Holland Company, Robertsdale,

Alabama.

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 Comanded to Summon MAURICE WAYNE McNEIL

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 MAURICE WAYNE
McNEIL, Defendant.....

by BERYL DENE McNEIL

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

Witness my hand this 11 day of March 19 60

Archie J. Newick, Clerk

48713

No. _____ Page _____

STATE of ALABAMA
Baldwin County

CIRCUIT COURT

BERYL DENE MCNEILL

Plaintiffs

vs.

MAURICE WAYNE MCNEILL

Defendants

Summons and Complaint

Filed _____ 19__

FILED

MAR 11 1960

ALBERT DUCK, CLERK
REGISTRAR Clerk

JAMES A. BRICE

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.

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

POST OFFICE BOX 298

WHITEHALL 3-3601

May 20, 1960

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

4873

Re: Beryl Dene McNeil
vs: Maurice Wayne McNeil
In Equity

Dear Mrs. Duck:

Please ask Judge Hall to dismiss the above case
and kindly send me a cost bill.

Thank you.

Very truly yours,


James A. Brice

JAB/vd

BERYL DENE McNEIL,)	IN THE CIRCUIT COURT OF
COMPLAINANT,)	BALDWIN COUNTY, ALABAMA
VS.)	IN EQUITY
MAURICE WAYNE McNEIL,)	
RESPONDENT.)	

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

Your Complainant, Beryl Dene McNeil, respectfully represents and shows unto your Honor:

1. That the Complainant and Respondent are both residents citizens of Baldwin County, Alabama, and have been such for more than two (2) years next preceeding the filing of this Bill of Complaint.

2. That your Complainant and Respondent were lawfully married at Mattoon, Illinois, on October 27, 1956. That one (1) child, Connie Christine McNeil, age one year old, has been born of said marriage.

3. That heretofore, on the 24th day of December, 1959, at the residence of Kermit Blackmon, at or near Foley, Alabama, the Respondent, without cause or justification, in the presence of reliable witnesses struck and slapped the Complainant in and about the face, knocked her against a wall, inflicting bruises and injuries upon her, attended with great danger to her health and life; and from his manner and conduct toward her, she feels that the Respondent will commit further actual physical violence upon her person attended with danger to her health and life; that she has separated from the Respondent and the parties are not now living together as husband and wife.

4. The Complainant further alleges that the Respondent is gainfully employed by the Pace-Holland Company, Robertsdale, Alabama, earning a salary of about \$50.00 per week and that he is fully capable of providing some manner of support for the minor child of the marriage.

WHEREFORE, THE PREMISES CONSIDERED, your Complainant prays that the Respondent be made a party to this cause and prays that the process of this Court be directed to him according to law, requiring him 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 your Complainant an absolute divorce from the Respondent and will award your Complainant the full, complete, and entire custody and control of Connie Christine McNeil, subject to rights of reasonable visitation in the home of the Complainant by the Respondent; and Complainant prays that your Honor will order and decree that the Respondent pay to the Complainant each week hereafter the sum of Ten and No/100 (\$10.00) Dollars for the support of said minor child; and Complainant prays for such other, further and general relief as to which she may be entitled, pleadings and evidence considered, as she will ever pray.


SOLICITOR FOR COMPLAINANT

The Respondent resides two (2) doors from Arthur John Rich, Foley, Alabama, and is employed at Pace-Holland Company, Robertsdale, Alabama.

FILED
3-11 60
WILLIE G. COOK, CLERK
REGISTER

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

MAURICE WAYNE McNEIL

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 MAURICE WAYNE

McNEIL

....., Defendant.....

by BERYL DENE McNEIL

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

Witness my hand this.....

14

day of.....

March

..... 19. 60

Aurice J. Newsham, Clerk

STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

BRYL DENE MCNEILL

Plaintiffs

vs.

MAURICE WAYNE MCNEILL

Defendants

Summons and Complaint

Filed FILED 19__

JAB Clerk

ALICE J. DUNN CLERK
REGISTER

JAMES A. BRICE

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

March 11, 1920

Sheriff.

I have executed this summons

this _____ 19__
by leaving a copy with

Leathley By Bruce

Sheriff.

Deputy Sheriff.