

4897

JOHN P. BEEBE  
ATTORNEY AT LAW  
ROBERTSDALE, ALABAMA

April 11th, 1960

Mrs. Alice J. Duck, Register,  
Circuit Court, Baldwin County,  
Bay Minette, Alabama.

Dear Mrs. Duck:

I enclose original and one copy of bill of complaint in the matter of Verda Mae McKinley vs. Arnold McKinley, being petition for divorce, with a request that the same be filed and that a copy of the bill of complaint be served on the defendant, who lives in the town of Loxley.

Thanking you, I am

Sincerely yours,

John P. Beebe

P.S.  
Please attach your  
Summons

SUMMONS AND COMPLAINT

Circuit Court, Baldwin County

The State of Alabama,  
Baldwin County.



No. 4897

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Arnold 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

Arnold McKinley, Defendant

by Verda Mae McKinley, Plaintiff

Witness my hand this 12th day of April 19 60

Alvin J. Smith, Clerk

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

The State of Alabama  
Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed \_\_\_\_\_ 19\_\_\_\_

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

\_\_\_\_\_ Sheriff

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

VERDA MAE MCKINLEY,  
Complainant,

vs

ARNOLD MCKINLEY,  
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

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

Comes your Complainant, Verda Mae McKinley, and humbly complaining against Arnold McKinley, Defendant, and respectfully shows unto your Honor:

FIRST: That your Complainant is over the age of twenty-one years and is a resident of the Town of Loxley, Baldwin County, Alabama, where she has resided for the past twelve years next preceding the filing of this bill of complaint.

SECOND: That the Defendant is over the age of twenty-one years and is a resident of the Town of Loxley, Baldwin County, Alabama, where he has resided for the past twelve years next preceding the filing of this bill of complaint.

THIRD: That your Complainant and the said Defendant were married in the City of Bartow, Polk County, Florida, on the 27th day of December, 1937, and lived together as husband and wife until in March of 1960.

FOURTH: That two children were born to this union, namely: Byron C. McKinley, who is twenty one years of age, and Barbara J. McKinley, who is 17 years of age, both of whom live with your Complainant.

FIFTH: That the said Defendant has committed acts of adultery with a woman whose name is unknown to your Complainant, but who lives in the vicinity of the Town of Silverhill, Baldwin County, Alabama, which said acts of adultery were committed on, to-wit: April 5th., 8th., and 9th., 1960, in Baldwin County, Alabama, and that since the commission of the said acts your Complainant has not lived with the Defendant as husband and wife, and has not condoned such acts on the part of the said Defendant.

SIXTH: Your Complainant further shows unto your Honor that the Defendant is regularly employed and earns from his work and labor in excess of \$400.00 per month, and that there is a minor child the said Barbara J. McKinley, who is in high school preparing for college, and that the said Defendant is financially able to pay for the maintenance and education of said minor child, and to pay the cost of this proceeding.

WHEREFORE, your Complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint, and make the said Arnold McKinley party Defendant hereto, and by appropriate process require him to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the final hearing of this cause this Honorable Court will make and enter an order and decree forever dissolving the bonds of matrimony between this Complainant and the said Defendant, and that the Complainant be awarded the care and custody of the said minor child and that the said decree of the Court determine an amount sufficient for the maintenance and education of the said minor, Barbara J. McKinley, and order that the same be paid by the said Defendant for the benefit of the said minor, and further ordering that the cost of this proceeding be taxed against the said Defendant; and the Complainant prays for such other, further or different relief as she shall in equity and good conscience be entitled to in the premises.

*John P. Beebe*  
Solicitor for Complainant

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,  
Baldwin County.



Circuit Court, Baldwin County

No. 4897

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-----Arnold McKinley-----, Defendant

by -----Verda Mae McKinley-----

-----, Plaintiff

Witness my hand this 12th day of April 1960

Alice J. Knecht, Clerk

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

The State of Alabama  
Baldwin County

CIRCUIT COURT

\_\_\_\_\_ Plaintiffs

vs.

\_\_\_\_\_ Defendants

Summons and Complaint

Filed \_\_\_\_\_ 19\_\_\_\_

\_\_\_\_\_ Clerk

\_\_\_\_\_ Plaintiff's Attorney

\_\_\_\_\_ Defendant's Attorney

Defendant lives at

Received In Office

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Complainant,

vs

ARNOLD MCKINLEY,  
Defendant.

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA

) IN EQUITY

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Solicitor for Complainant