

The State of Alabama, }
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon

MACK D. WHITE,

of BALDWIN County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

IDA WHITE,

against said

MACK D. WHITE,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Robert S. Duck, Register of said Circuit Court, this 20th day of December 1937

Robert S. Duck

Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

The State of Alabama, }
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING :

WE COMMAND YOU, That you summon

MACK D. WHITE,

of BALDWIN County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

IDA WHITE,

against said

MACK D. WHITE,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Robert S. Duck, Register of said Circuit Court, this 20th day of December 1937



Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

IDA WHITE,
Complainant,
vs.
MACK D. WHITE,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

BILL OF COMPLAINT

TO THE HONORABLE P. W. HARE, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN CHANCERY SITTING:

PART ONE

Your Complainant, Ida White, respectfully shows unto your Honor that she is over the age of twenty-one years and a bona fide resident of Baldwin County, Alabama, residing at Summerdale therein and that the respondent, Mack D. White is also over the age of twenty-one years and a resident of Baldwin County, Alabama, residing near Summerdale therein.

PART TWO

1. Your Complainant further alleges and shows to the Court that she was lawfully married to the Respondent on April 21st, 1930, at Bay Minette, Alabama, and has resided in Baldwin County, Alabama for more than three years last past with the bona fide intention of making her permanent home there.

2. That the issue of the marriage between the Complainant and Respondent is one child, Irma White, who is now aged twenty-two months, and that your Complainant is able to provide for, support, maintain and educate said minor child and is in all respects a fit and proper person to have the care and custody of such child.

3. That almost ever since the parties hereto were married as aforesaid, the Respondent has been guilty of extreme cruelty towards your Complainant and has many times struck and abused and threatened your Complainant and has committed physical violence upon her person, which has seriously affected her health and by reason of such conduct on the part of the Respondent, your Complainant's married life with him has been rendered intolerable

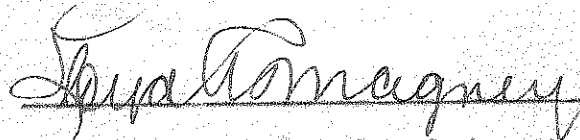
to her and she has separated from the Respondent and desires a divorce from him and the custody of the minor child of the parties.

PART THREE

WHEREFORE, your Complainant prays that your Honor will take jurisdiction of this cause and will grant to her the writ of summons of the State of Alabama to the Respondent, Mack D. White, commanding him to appear, plead or answer within thirty days from the service of such writ and to abide such order and decree as your Honor may enter herein.

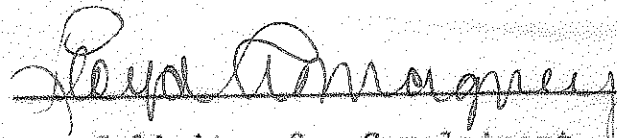
PART FOUR

Your Complainant further prays that upon a final hearing of this cause, your Honor will grant to her a decree of absolute divorce from the Respondent, Mack D. White and will grant to her the exclusive care, custody and control of the minor child of the parties, Irma White, and that she may have such other and further relief in the premises as may be just and equitable.


Solicitor for Complainant.

FOOTNOTE

Your Respondent, Mack D. White, is required to answer the allegations of Part Two of the foregoing bill of complaint from Paragraph numbered one to Paragraph numbered Three, both inclusive, but not under oath, oath to answer being hereby expressly waived.


Solicitor for Complainant.

IDA WHITE,
Complainant,
vs.
MACK D. WHITE,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

BILL OF COMPLAINT

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN CHANCERY SITTING:

PART ONE

Your Complainant, Ida White, respectfully shows unto your Honor that she is over the age of twenty-one years and a bona fide resident of Baldwin County, Alabama, residing at Summerdale therein and that the respondent, Mack D. White is also over the age of twenty-one years and a resident of Baldwin County, Alabama, residing near Summerdale therein.

PART TWO

1. Your Complainant further alleges and shows to the Court that she was lawfully married to the Respondent on April 21st, 1930, at Bay Minette, Alabama, and has resided in Baldwin County, Alabama for more than three years last past with the bona fide intention of making her permanent home there.

2. That the issue of the marriage between the Complainant and Respondent is one child, Irma White, who is now aged twenty-two months, and that your Complainant is able to provide for, support, maintain and educate said minor child and is in all respects a fit and proper person to have the care and custody of such child.

3. That almost ever since the parties hereto were married as aforesaid, the Respondent has been guilty of extreme cruelty towards your Complainant and has many times struck and abused and threatened your Complainant and has committed physical violence upon her person, which has seriously affected her health and by reason of such conduct on the part of the Respondent, your Complainant's married life with him has been rendered intolerable

to her and she has separated from the Respondent and desires a divorce from him and the custody of the minor child of the parties.

PART THREE

WHEREFORE, your Complainant prays that your Honor will take jurisdiction of this cause and will grant to her the writ of summons of the State of Alabama to the Respondent, Mack D. White, commanding him to appear, plead or answer within thirty days from the service of such writ and to abide such order and decree as your Honor may enter herein.

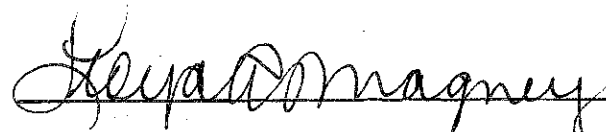
PART FOUR

Your Complainant further prays that upon a final hearing of this cause, your Honor will grant to her a decree of absolute divorce from the Respondent, Mack D. White and will grant to her the exclusive care, custody and control of the minor child of the parties, Irma White, and that she may have such other and further relief in the premises as may be just and equitable.


Solicitor for Complainant.

FOOTNOTE

Your Respondent, Mack D. White, is required to answer the allegations of Part Two of the foregoing bill of complaint from Paragraph numbered one to Paragraph numbered Three, both inclusive, but not under oath, oath to answer being hereby expressly waived.


Solicitor for Complainant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

copy
IDA WHITE,

Complainant,

vs.

MAACK D. WHITE,

Respondent.

C O P Y
COMPLAINT

Filed December 20, 1933
R. S. O'neal, Register

LLOYD A. MCGHEE
Attorney
Foley, Alabama.

RECORDED
Original
7-325

Summerdale, Ala.

Serve on

Circuit Court of Baldwin County
IN EQUITY

No. 387

SUMMONS

IDA WHITE,
Complainant,

vs.

MACK D. WHITE,
Respondent.

LLOYD A. MAGNEY,
Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____, 193_____

SHERIFF

Executed this _____ day of _____

193_____

by leaving a copy of the within Summons with

out of State
in Florida

Defendant

W. S. Skilkin

Sheriff

By *R. S. ...*

Deputy Sheriff

copy

357

Serve on _____

**Circuit Court of Baldwin County
IN EQUITY**

No. 357

S U M M O N S

IDA WHITE,
Complainant,

vs.

MACK D. WHITE,
Respondent.

FLOYD A. MACNEY,
Solicitor for Complainant

Recorded in Vol. _____ Page _____

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

Received in office this _____

day of _____, 193_____

SHERIFF

Executed this _____ day of _____

193_____

by leaving a copy of the within Summons with _____

Defendant

Sheriff

By _____
Deputy Sheriff

*Not found in my
county of Baldwin County
and returning 4/19/34
Floyd A. Macney
Solicitor for Complainant
per Day for Mack D. White*

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

IDA WHITE,

copy
Complainant,

vs.

MACK D. WHITE,

Respondent.

C O P Y
COMPLAINT

Filed December 20, 1937
R. S. Ount, Register

LLOYD A. MCGHEE
Attorney
Foley, Alabama.

RECORDED
Original
7-369

Summerdale, Ala.

Serve on _____

Circuit Court of Baldwin County
IN EQUITY

No. 387

SUMMONS

IDA WHITE,
Complainant,

vs.

MACK D. WHITE,
Respondent.

LLOYD A. MAGNEY,
Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____, 193_____

SHERIFF

Executed this _____ day of _____ 193_____

by leaving a copy of the within Summons with

Out of State
in Florida

Defendant

W. E. Kirkbride

Sheriff

By *B. H. Truener*

Deputy Sheriff

copy

357

Serve on _____

**Circuit Court of Baldwin County
IN EQUITY**

No. 387

S U M M O N S

TDA WHITE,
Complainant,

vs.

MACK D. WHITE,
Respondent.

LLOYD A. MAGNEY,
Solicitor for Complainant

Recorded in Vol. _____ Page _____

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

Received in office this _____

day of _____, 193_____

SHERIFF

Executed this _____ day of _____
193_____

by leaving a copy of the within Summons with

Defendant

Sheriff

By _____
Deputy Sheriff

W. J. Fountain
County of Baldwin
and signed 4/19/35
W. J. Fountain
Deputy Sheriff