

THE STATE OF ALABAMA
Baldwin County

Circuit Court of Baldwin County, Alabama.
(In Equity)

ROYAL C. FROST COMPLAINANT

VS.

RENA FROST RESPONDENT

I, Bernice F. Reid

as Register and Commissioner

have called and caused to come before me Royal C. Frost and Andrew Crysell

witness^{es} named in the Requirement for Oral Examination, on the 15th day of May

19 43, at the office of Beebe & Hall

in Bay Minette, Alabama, Alabama, and having first sworn said witness^{es} to speak the truth,

the whole truth, and nothing but the truth, the said Royal C. Frost and Andrew Crysell

doth depose and say as follows:

ROYAL C. FROST.

My name is Royal C. Frost. I am a resident of Baldwin County, Alabama, and have been for more than three years next preceding the filing of this Bill of Complaint. I am over twenty one years of age. The Respondent is over twenty one years of age and a non resident of the State of Alabama, her address being 315 North E. Street, Pensacola, Florida.

The Respondent and I were married on June 1st, 1911. We lived together as husband and wife until in August, 1934.

In August of 1934, the Respondent left me voluntarily and has remained away voluntarily and continuously since that time. We have not lived together as man and wife since August, 1934. I gave the Respondent no reason for leaving me, and have done nothing toward forcing her to remain away. She has repeatedly stated that she would never again live with me as my wife.

Royal C. Frost

ANDREW CRYSELL

Andrew Crysell, a witness for Complainant, being first duly sworn deposes and says:

My name is Andrew Crysell. I am personally acquainted with the Complainant and the Respondent in the above styled case. I have known the Complainant for about twenty years and have been around him daily for the past eight or ten years. I know of my own personal knowledge that the Complainant and Respondent have not lived together as husband and wife since in 1934. I have often heard the Respondent say that she would never again live with the Complainant as his wife.

The Complainant is now, and has been, living here in Bay Minette during the time I have known him. The Respondent went to Pensacola some time about 1935, and so far as I know has not been back to Baldwin County for any appreciable time since then.

Witnesses:
Bernice F. Reid
Shuster

Andrew Crysell
mark

CIRCUIT COURT IN EQUITY

No. Page

The State Of Alabama

Baldwin County

In Circuit Court, In Equity

vs. Complainant

Respondent

DIVORCE DECREE

I, the undersigned, Judge of the Circuit Court in Equity for Baldwin County, Alabama, do hereby certify that the within and foregoing is a true and correct copy of the original copy as recorded by me in the office of the Circuit Court in Equity for Baldwin County, Alabama, on this day of ... 19...

Witness my hand and seal of office at the City of Baldwin, Alabama, this ... day of ... 19...

My Commission Expires on the ... day of ... 19...

Notary Public for Baldwin County, Alabama

Approved by the Circuit Court in Equity for Baldwin County, Alabama, on this day of ... 19...

Witness my hand and seal of office at the City of Baldwin, Alabama, this ... day of ... 19...

Notary Public for Baldwin County, Alabama

Approved by the Circuit Court in Equity for Baldwin County, Alabama, on this day of ... 19...

RECORDED

No. _____

The State of Alabama,
BALDWIN COUNTY

IN EQUITY
CIRCUIT COURT OF BALDWIN COUNTY

ROYAL C. FROST

COMPLAINANT

VS.

RENA FROST

RESPONDENT.

NOTE OF TESTIMONY

Filed in Open Court this 17

day of May 1943

R. Duck

Register.

ORAL EXAMINATION

I, Bernice F. Reid, as Register and Commissioner hereby certify that the foregoing deposition^s on Oral Examination was taken down in writing by me in the words of the witness^{es} and read over to them and they signed the same in the presence of myself and H. M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness^{es} or had proof made before me of the identity of said witness^{es}; that I am not of counsel or of 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 15th day of May, 19 43.

Bernice F. Reid (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

ROYAL G. FROST

Complainant

Vs.

RENA FROST

Respondent

ORAL DEPOSITION

Filed May 17, 19 43

R. S. Black, Register

RECORDED IN

Record

Vol. _____ Page _____

Register

1914

RETURN RECEIPT

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Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

1
(Signature of name of addressee)

2
(Signature of addressee's agent—Agent should enter full name on Form ONE above)

Date of delivery 194

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300

POST OFFICE OF DELIVERING
OFFICE
MAY 12 1910

Return to R. L. Duck, Care Clerk
(NAME OF SENDER)

Street and Number
of Post Office Box

REGISTERED ARTICLE

No. 1457 Post Office Lowville, Ala.

INSURED PARCEL

No. 1457 State

and board of the Complainant, and has remained away voluntarily and continuously since that time.

PRAYER FOR PROCESS.

Wherefore, the premises considered, your Complainant prays that your Honor will by proper process, make the said RENA FROST party respondent to this Bill of Complaint, requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing hereof, your Honor will give and grant unto him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; and that your Honor will give and grant unto him such other, further, different and general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

BEEBE & HALL

BY: *Huber*
Solicitors for Complainant

920

RECORDED

ROYAL C. FROST,
COMPLAINANT

VS

HEENA FROST,
RESPONDENT.

SUMMONS AND COMPLAINT.

*File Office 3/19/43
R. A. Burch
By*

ROYAL C. FROST.

vs.

RENA FROST.

CIRCUIT COURT OF
Baldwin County.

IN EQUITY.

In this cause it being made to appear to the Register that on the 3rd day of April, 1943, a copy of the Bill of Complaint filed in this cause was sent to Rena Frost,

Defendant, by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," and return receipt demanded addressed to the Register of this Court; and that on the 11th day of April, 1943, such receipt was duly received and filed in this cause:

And it further appearing to the Register that the said Defendant has failed to plead, answer or demur to the said Bill to the date hereof, it is now, therefore, on motion of Complainant, ordered, adjudged and decreed by the Register that the said Bill of Complaint be, and it hereby is in all things taken as confessed against the said Rena Frost.

Defendant.

This the 14th day of May, 1943.

Robert L. ... Register.

No. 920.

CIRCUIT COURT OF BALDWIN
COUNTY, ALA.

In Equity.

Royal C. Frost.

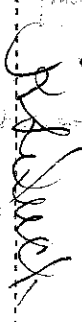
vs.

Rena Frost,

Decree Pro Confesso After
Notice By Registered Mail.

Filed in office this 14th day of

May, 1924



Register

tered in O. B. Page

NO. _____

ROYAL C. FROST

Complainant—

VS.

RENA FROST

Respondent—

Request For Decree In Vacation

Filed May 17, 1943

R. Deuch

Register.

926