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# The State Of Alabama, Baldwin County

## CIRCUIT COURT, IN EQUITY

\_\_\_\_\_ MARY FRANCES REED \_\_\_\_\_ Complainant  
 VS  
 \_\_\_\_\_ JOSEPH D. REED \_\_\_\_\_ Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decress Pro Confesso on Answer and Waiver 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 MARY FRANCES REED is forever divorced from the said

JOSEPH D. REED  
 for and on account of Cruelty.

It is further ordered, adjudged and decreed that Complainant be, and she is, hereby permitted to resume the name, Mary Frances Brown.

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 Mary Frances Reed and Joseph D. Reed be, and ~~they are~~ hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Mary Frances Reed the Complainant pay the cost herein to be taxed, for which execution may issue.

This 22<sup>nd</sup> day of June, 1943.

J. W. Hase  
 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.

CIRCUIT COURT IN EQUITY

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The State Of Alabama  
Baldwin County

In Circuit Court, In Equity

vs. Complainant.

Respondent.

DIVORCE DECREE

It is further ordered, adjudged and decreed that neither party to this suit shall have any claim to each other's real estate after the rendition of this decree, and that a report be filed within sixty days, which shall again certify to each other during the pendency of this appeal.

It is further ordered that the husband and wife shall be restored to the status of husband and wife, and shall be permitted to again contract marriage upon the period of the said decree.

It is further ordered that the husband and wife shall be restored to the status of husband and wife, and shall be permitted to again contract marriage upon the period of the said decree.

Witness my hand and seal this 10th day of \_\_\_\_\_ 19\_\_.

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 Court of the Circuit Court in the above stated cause, which said decree is on file and entered in my office.

Witness my hand and seal this 10th day of \_\_\_\_\_ 19\_\_.

Register of Circuit Court in Equity

STATE OF ALABAMA  
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, that you summon JOSEPH D. REED to be and appear before the judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction within sixty days after the service of the summons, and there to answer, plead or demur without oath to a Bill of Complaint, lately exhibited by MARY FRANCES REED against the said JOSEPH D. REED and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit, under penalty, etc. And we further command that you return this writ with your execution thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Circuit Court, this 22 day of June, 1943.

R. S. Duck  
REGISTER.

MARY FRANCES REED	)	
	)	IN THE CIRCUIT COURT OF
COMPLAINANT	)	BALDWIN COUNTY, ALABAMA
	)	
VS	)	IN EQUITY:
	)	
JOSEPH D. REED	)	
	)	
RESPONDENT.	)	

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

Now comes your Complainant, Mary Frances Reed, and humbly complaining against the Respondent, Joseph D. Reed, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant is a resident of Atmore, Escambia County, Alabama, and twenty years of age; that the Respondent is a resident of Atmore, Escambia County, Alabama, and over twenty one years of age;

2.

That your Complainant and the Respondent were married at Milton, Florida, on April 6th, 1943

3.

That immediately after their marriage, and at various times during their married life, the Respondent cursed and threatened and abused the Complainant, and often threatened to do actual violence to her person, which would necessarily

endanger her life and health, that the conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe, and she did actually believe, that if she continued to live with him he would carry out his threats and do violence to her person which would necessarily endanger her life and health.

PRAYER FOR PROCESS.

Wherefore, the premises considered, your Complainant prays that your Honor will, by proper process, make the said Joseph D. Reed party Respondent to this Bill of Complaint, requiring him 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 her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent, and that your Honor will give and grant unto her such other, further, different and general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

BEEBE & HALL

BY *Shirley*

MARY FRANCES REED,  
COMPLAINANT  
VS  
JOSEPH D. REED  
RESPONDENT

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

Now comes the Respondent, in his own proper person and accepts service of the summons and complaint in this cause.

The Respondent, for answer to the Complainant's Bill of Complaint, denies each and every allegation contained therein, and demands strict proof of the same.

THE Respondent waives notice of the time of taking testimony on behalf of Complainant, the right to cross examine Complainant's witnesses, and consents that this cause be submitted forthwith for final decree, without further notice.

Joseph D. Reed  
Respondent

WITNESS:

Norma White  
Mary M. Howell

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**RECORDED**

WAINY FRANKS REED

COMPLAINANT

VS

JOSEPH D. REED

RESPONDENT.

-----  
SIMMONS AND COMPLAINANT.

*Filed*

*6-22-43 -*

*P. S. Mueska*

**RECORDED**

MARY FRANCIS REED  
COMPLAINANT

VS

JOSEPH D. REED  
RESPONDENT.

ANSWER AND WAIVER.

*Filed*  
*6-29-43*

*P.S. Lunche*

THE STATE OF ALABAMA  
Baldwin County

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

MARY FRANCES REED

COMPLAINANT

VS.

JOSEPH D. REED

RESPONDENT

I, Bernice S. Reid

as Register and Commissioner

have called and caused to come before me Mary Frances Reed and Norma White

witness— named in the Requirement for Oral Examination, on the \_\_\_\_\_ day of \_\_\_\_\_

19 43, at the office of Beebe & Hall

in Bay Minette, Alabama, and having first sworn said witness et to speak the truth,

the whole truth, and nothing but the truth, the said Mary Frances Reed and

Norma White doth depose and say as follows:

My name is Mary Frances Reed. I am twenty years of age, and a resident of Atmore, Escambia County, Alabama. The Respondent, Joseph D. Reed is over twenty one years of age and a resident of Atmore, in Escambia County, Alabama. The Respondent and I were married in Milton, Florida on April 6th, 1943. We have lived at Atmore, in Escambia County, Alabama, since our marriage.

It was learned immediately after our marriage that the Respondent and I could not get along. He often threatened, cursed and abused me, and threatened to do violence to my person. It was impossible for me to do anything to please him. His conduct toward me has been, and is, such as to give me every reasonable apprehension to believe, and I do actually believe, that if I continue to live with him he will carry out his threats and do violence to my person which would necessarily endanger my life and health.

I have two children by a former marriage which seems to be the cause of our trouble. I, of course, can not give up my children. I have struggled every way to reconcile conditions so that we could get along and live together as husband and wife in peace, but it is impossible. I have supported my children during their life and am in position to again support them.

Mary Frances Reed

Norma White, a witness for Complainant, being duly sworn, deposes and says: My name is Norma White. I am personally acquainted with the Complainant and the Respondent in the above cause. I have had occasion to be around them from time to time and practically every week end since their marriage. I have had an unusual opportunity to observe their mode of living and the manner in which they get along. The Respondent is a man of high temperament and I have often heard him threaten and abuse the Complainant. His conduct toward the Complainant is such as to render it impossible for her to live with him. I know of my own personal knowledge that the conditions are such that it is absolutely impossible for the Complainant and the Respondent to live together as husband and wife.

Norma White



**ORAL EXAMINATION**

I, Bernice F. Reid, as Register and Commissioner hereby certify that the foregoing deposition— 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 of H. M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness<sup>es</sup> or had proof made before me of the identity of said witness<sup>es</sup>, 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 21st day of June, 1945  
Bernice F. Reid (L. S.)

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<b>THE STATE OF ALABAMA</b>	
<b>Baldwin County</b>	
<b>IN CIRCUIT COURT, IN EQUITY</b>	
<u>MARY FRANCES REED</u>	Complainant
<b>COMPLAINANT</b>	
<b>Vs.</b>	
<u>JOSEPH D. REED</u>	Respondent
<b>RESPONDENT</b>	
<b>ORAL DEPOSITION</b>	
Filed <u>6-27</u>	<u>1945</u>
<u>R. S. Slueck</u>	Register
<b>RECORDED IN</b>	
Vol. _____	Page _____
_____	Record _____
_____	Register _____

State of Alabama,  
Baldwin County.

} NO. \_\_\_\_\_

TERM, 194<sup>3</sup>.

MARY FRANCES REED

Complainant—

VS.

JOSEPH D. REED

Respondent—

TO R. S. DUCK, REGISTER:

In the above stated cause a answer and waiver  
having been filed the Respondent—,  
and evidence having been taken, and the cause being ready for submission for final decree, and  
no defense having been interposed, the complainant—, by Beebe & Hall,  
Solicitor<sup>s</sup> of record, now files with the Register of this Court this written request to deliver the  
papers in this cause to the Judge for final decree in vacation.

Beebe & Hall

Solicitor<sup>s</sup> for Complainant—

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MARY FRANCES REED

Complainant—

VS.

JOSEPH D. REED

Respondent—

**Request For Decree In Vacation**

Filed 6-22, 1943

R. S. Muck

Register.

MARY FRANCES REED

COMPLAINANT

VS.

JOSEPH D. REED

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, \_\_\_\_\_

Answer and Waiver of Respondent, testimony of Mary Frances Reed and \_\_\_\_\_

Norman White \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

and in behalf of Defendant upon \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*R. S. Duck* Register.

**RECORDED**

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

**The State of Alabama,**  
BALDWIN COUNTY

**IN EQUITY**  
CIRCUIT COURT OF BALDWIN COUNTY

MARY FRANCES REED

COMPLAINANT

VS.

JOSEPH D. REED

RESPONDENT.

**NOTE OF TESTIMONY**

Filed in Open Court this \_\_\_\_\_  
day of \_\_\_\_\_ 194 \_\_\_\_\_

Register.

Moore Printing Co.

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