

1582

Adolph Frost

Complainant

No.

vs.

Decima Frost

Defendant

IN THE CIRCUIT COURT OF BALDWIN  
~~MOBILE~~ COUNTY, ALABAMA  
IN EQUITY

ANSWER AND WAIVER

Comes the Defendant in the above entitled cause and for answer to the Bill of Complaint therein admits the allegations as to the ages, residences and marriage and denies each and every other allegation of said Bill of Complaint and demands strict proof thereof.

I agree that the testimony in this cause may be taken by deposition on oral examination, and waive notice of the time and place of the taking such testimony and agree that this cause may be submitted for final decree at any time. I waive all notices to which I may be entitled to by law in this cause.

Decima Frost  
Defendant.

STATE OF ALABAMA  
COUNTY OF MOBILE

I, C. H. Denton, a Notary Public in and for said State and County, do hereby certify that Decima Frost, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day, that being informed of the contents of the instrument, she executed the same voluntarily on the day same bears date.

Witness my hand and seal this 13th day of March 1944.

C. H. Denton  
NOTARY PUBLIC  
STATE OF ALABAMA  
COUNTY OF MOBILE

Filed, \_\_\_\_\_  
~~XXXXXXXXXX~~ REGISTER.

ADOLPH FROST,  
Complainant,

-vs-

DECIMA FROST,  
Respondent,

)  
) IN THE CIRCUIT COURT OF  
) BALDWIN COUNTY, ALABAMA.  
)  
) IN EQUITY - No.

TO THE HONORABLE, FRANCIS W. HARE, JUDGE OF SAID COURT:

1. Your complainant shows unto Your Honor that both he and the respondent are each over the age of twenty-one years; that he is a bona-fide resident of Mobile County, Alabama, and that the respondent is a bona-fide resident of Baldwin County, Alabama.
2. Your complainant further shows unto Your Honor that he and the respondent are husband and wife, having been lawfully married to each other at Foley, Baldwin County, Alabama, on to wit, the 16th day of January 1934, and lived together as such in said town until to wit, October 1st, 1943, on which date they separated, and have not lived together since said date.
3. Your complainant further shows unto Your Honor that the respondent since her marriage to the complainant, has committed adultery with divers men, whose names are unknown to your complainant, and complainant avers that he has not condoned her said acts of adultery.
4. Your complainant further ~~shows unto Your Honor~~ that three children were ~~born~~ <sup>born</sup> as the issue of their marriage, and their names and ages are as follows: Donald Frost, six years of age, Adrion Frost, five years of age and Violet Frost, one year of age, and that said minor children are in the care, custody and control of the respondent.

PRAYER FOR PROCESS

The premises considered, your complainant prays for the issuance of due and legal process out of this Honorable Court, making the said Decima Frost, a party respondent hereto, and requiring her to plead, answer or demur to this bill of complaint within the time required by law and the rules, regulations and practice of this Honorable Court.

PRAYER FOR RELIEF

Your complainant prays that upon the final hearing of this cause, and upon consideration of the evidence offered in support thereof, that your Honor will grant unto him an absolute divorce from the respondent; will also grant unto him the right to remarry should he so desire, and your complainant prays for all such other, further or different relief, as in Equity, he may be entitled to receive in the premises, and he will ever pray.

  
SOLICITOR FOR COMPLAINANT

**The State of Alabama, Baldwin County**  
~~Mobile County~~

**ADOLPH FROST**

Complainant

No.

VS.

**DECIMA FROST**

Defendant

**BALDWIN COUNTY**  
**Circuit Court of Mobile County**

**IN EQUITY**

The **Complainant**

requests the oral examination of the following named witnesses

on **his** behalf, viz: **Adolph Frost and Joe Carlee**

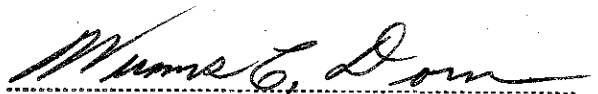
said witnesses reside in the County of **Adolph Frost resides in Mobile County and Joe Carlee resides in Baldwin County, Alabama,**  
State of Alabama

**Annie E. Davis**

who resides at **Mobile, Alabama,**

is suggested as **a** suitable person to be appointed Commissioner to take deposition **s** of

said witnesses on such oral examination



Solicitor for **Complainant**

STATE OF ALABAMA )  
COUNTY OF MOBILE )

KNOW ALL MEN BY THESE PRESENTS, that

WHEREAS, on the 20th day of March, 1944, Adolph Frost, party of the first part, will institute a bill of complaint in the Circuit Court of Baldwin County, Alabama, In Equity, against his wife, Decima Frost, party of the second part, for a divorce and

WHEREAS, three children, Donald Frost, age six years, Adrion Frost, age five years and Violet Frost, age one year, were born as the issue of their marriage, and that said minor children are in the care, custody and control of the party of the second part, and

WHEREAS, it is the wish and desire of the undersigned parties to amicably arrange, adjust and settle between themselves all questions relating and pertaining to the custody, maintenance, support and education of said minor children.

NOW, THEREFORE, in consideration of the premises and in accordance with the agreement of the undersigned as herein expressed, it is hereby distinctly understood and agreed by and between the parties hereto, that the party of the second part shall have and be awarded the care, custody and control of the said three minor children hereinabove named, and it is expressly requested that said Court award the care, custody and control of said named minor children to the party of the second part.

It is further distinctly understood and agreed by and between the parties hereto that the party of the first part hereby agrees and binds himself to pay to the said party of the second part the sum of Fifteen and no/100 (\$15.00) Dollars each week for the maintenance, support and education of their said three minor children, the first payment or installment of Fifteen and no/100 (\$15.00) Dollars to be due and payable to the party of the second part by the party of the first part on the 18th day of March, 1944, and a like sum of money each and every succeeding week thereafter until each of them reaches twenty-one years of age, or until they or anyone of them become self supporting or contracts marriage, in which event, payment for his, her, or their support or share or proportionate part thereof, shall cease and terminate, and party of the first part shall be under no further liability for the or to the said three children after each reach the age of twenty-one years.

marries or becomes self supporting.

It is further distinctly understood and agreed by and between the parties hereto that the party of the first part shall have and be given the right to visit and see the said three minor children at all reasonable and proper times.

It is hereby further distinctly understood and agreed by and between the parties hereto that the terms and conditions hereof shall be incorporated in the final decree and form a part thereof.

In witness whereof, the undersigned have hereunto set their hands and seals on this the 13 day of March, 1944.

Adolph Frost (SEAL)

Becima Frost (SEAL)

WITNESSES:

Herb Wiley Fentler

J. H. Latner

No. 1582

**BALDWIN COUNTY**  
**Circuit Court of ~~Mobile~~ County**

Bay Minette,  
~~Mobile~~ Alabama

IN EQUITY

Adolph Frost,

Complainant,

vs.

Decima Frost,

Respondent

DEMAND FOR ORAL EXAMINATION

Filed March 23 1944

*Richard Wicks*

Register

IN THE DISTRICT COURT OF  
SALVAGE COUNTY, ALABAMA  
IN MATTER OF

STATE OF ALABAMA  
SALVAGE COUNTY  
IN MATTER OF

-2-

TO THE HONORABLE, JAMES V. HARRIS, JUDGE OF SAID COURT:

Your complaint shows that your honor that I am the  
respondent and over the age of twenty-one years; that I am a  
resident of Mobile County, Alabama, and that the respondent in  
your complaint is William Harris, Alabama.

Your complaint further shows that your honor that I am  
respondent and that I am a resident of Mobile County, Alabama,  
and that the respondent in your complaint is William Harris,  
Alabama, and that I am a resident of Mobile County, Alabama,  
and that the respondent in your complaint is William Harris,  
Alabama.

*Handwritten notes:*  
1/11/44  
1/11/44  
1/11/44

*Handwritten signatures:*  
J. V. Harris  
J. V. Harris  
J. V. Harris

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Your complaint further shows that your honor that I am  
respondent and that I am a resident of Mobile County, Alabama,  
and that the respondent in your complaint is William Harris,  
Alabama, and that I am a resident of Mobile County, Alabama,  
and that the respondent in your complaint is William Harris,  
Alabama.

IN WITNESS WHEREOF

The petitioner certifies that the foregoing is a true and  
correct copy of the complaint filed in your honor's court,  
and that the respondent in your complaint is William Harris,  
Alabama, and that I am a resident of Mobile County, Alabama,  
and that the respondent in your complaint is William Harris,  
Alabama.

IN WITNESS WHEREOF

Your complaint shows that your honor that I am the  
respondent and over the age of twenty-one years; that I am a  
resident of Mobile County, Alabama, and that the respondent in  
your complaint is William Harris, Alabama.

No. 1682

*Grant*

VS.

*Grant*

**ANSWER AND WAIVER**

Filed, Nov 20 1944

*R. J. Grant*  
Register.



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Stipulation

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