

Clyde Naber Christiansen)
Complainant)

Vs.)

Paul Christainsen)
Defendant)

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

DEMAND FOR ORAL EXAMINATION

Comes the Complainant, by attorney, and represents
to the Court as follows:

1. That the following named witnesses reside within
one hundred miles from Bay Minette, in the County of Baldwin
Alabama, the place of trial of said cause, to-wit:

Clyde Naber Christiansen

2. That said complainant requires an oral examination
of said witnesses before a commissioner appointed by the
Register of this Court.

Beebe & Hall

By: J C Beebe
Solicitors for Complainant

NOTE:

Complainant suggests the name of Virginia Keel as
a suitable and competent person to act as commissioner upon
the examination of said witnesses.

Beebe & Hall

By: J C Beebe
Solicitors for Complainant

THE STATE OF ALABAMA }
Baldwin County

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

Clyde Naber Christiansen COMPLAINANT

VS.

Paul Christiansen RESPONDENT

I, Edith C. Bowers

as ~~Register and~~ Commissioner

have called and caused to come before me

Clyde Naber Christiansen

witness named in the Requirement for Oral Examination, on the 24 day of July

1944, at the office of WAC No 359/1st St. B.F.A.

in Indianapolis, Ind., Alabama, and having first sworn said witness to speak the truth,

the whole truth, and nothing but the truth, the said Clyde Naber Christiansen

doth depose and say as follows:

My name is Clyde Naber Christiansen. I am the Complainant in that cause pending in the Circuit Court of Baldwin County, Alabama, against Paul Christiansen for divorce. He and I are husband and wife. We married at Evergreen, Alabama, on the 17th day of September, 1941, and lived together as husband and wife at Bay Minette, Alabama, until January, 1944 when we separated because of the extreme cruelty of the Defendant. Several months prior to our separation the Defendant on numerous occasions came home drunk and in an enraged condition, cursed and abused me and threatened to beat me. On several times he did attempt to beat me but for the intervention of others would have done me bodily harm and from his conduct I had reasonable cause to believe and did believe that if I continued to live with him he would do me bodily harm attendant with danger to my life or health. We have not lived together since January, 1944. He is not in the armed service of the United States. I have lived in Bay Minette, Baldwin county, Alabama continuously for more than three years next preceding the filing of suit for divorce. The Defendant is a non-resident of the State of Alabama and I am advised and believe that he resides somewhere in the State of Illinois but his particular place of residence and Post Office address is unknown to me. I have not heard from him since we separated. We are both over the age of twenty-one years. He is beyond the military age.

Clyde Christiansen

.....Glyde Naber Christiansen.....
Complainant,
VS.
.....Paul Christiansen.....
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.
NO.....

DEMAND FOR ORAL EXAMINATION.

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from

Bay Minette....., in the County of *Baldwin*
Alabama, the place of trial of said cause, to-wit: *Clyde Naber*
Christiansen

2. That said complainant requires an oral examination of said witnesses before a com-

missioner appointed by the Register of this Court *Leche Hall*
By Dr C Sebe
Solicitor for Complainant.

NOTE:

Complainant suggests the name of *Edith C. Bowers*
~~*Elizabeth J. Hoffman*~~

as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Leche Hall
By Dr C Sebe
Solicitor for Complainant.

THE STATE OF ALABAMA }
Baldwin County

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

CLYDE NABER CHRISTIANSEN COMPLAINANT

VS.

PAUL CHRISTIANSEN RESPONDENT

I, Virginia Keel

as ~~Register and~~ Commissioner

have called and caused to come before me

Lloyd White

witness— named in the Requirement for Oral Examination, on the 28 day of July

19 44, at the office of Beebe & Hall

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

the whole truth, and nothing but the truth, the said Lloyd White

doth depose and say as follows:

My name is Lloyd White. I am a resident of Bay Minette, Baldwin County, Alabama, and have been all of my life. I am over the age of twenty-one years. I am the brother-in-law of Clyde Naber Christiansen. They were married at Evergreen September 17, 1941 and lived together until January 1944 when they separated because of his extreme cruelty. He became an habitual drunkard after their marriage and when drunk would curse and abuse her and on several occasions did curse, threaten and struck her but for the intervention of others would have done her bodily harm. They have not lived together since January, 1944.

Lloyd White

THE STATE OF ALABAMA, }
Baldwin County

CIRCUIT COURT

TO Edith C. Bowers

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Clyde Naber Christiansen

as witnesses in behalf of Clyde Naber Christiansen in a cause pending in our Circuit Court of Baldwin County, of said State, wherein

Clyde Naber Christiansen

Complainant

and

Paul Christiansen

Defendant,

on oath to be by you administered, upon oral examination

to take and certify the deposition of the witness and return the same to our Court, with all Convenient speed, under your hand.

Witness _____ day of _____ 19____

REGISTER

Commissioner's Fee \$ _____

Witness' Fees, \$ _____

THE STATE OF ALABAMA,
Baldwin County

}

CIRCUIT COURT

TO Virginia Keel

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Lloyd White

as witnesses in behalf of Clyde Naber Christiansen in a cause pending in our Circuit Court of Baldwin County, of said State, wherein

Clyde Naber Christiansen

Complainant

and Paul Christiansen

Defendant,

on oath to be by you administered, upon oral examination

to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 27 day of

July

1944
R. Keel

REGISTER

Commissioner's Fee \$

Witness' Fees, \$

1115

The State Of Alabama, Baldwin County
CIRCUIT COURT, IN EQUITY

Clyde Naber Christiansen Complainant

VS

Paul Christiansen Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decrees Pro Confesso on Publication 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 Clyde Naber Christiansen is forever divorced from the said

Paul Christiansen

for and on account of

Cruelty

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 Clyde Naber Christiansen be, and is hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Clyde Naber Christiansen the complainant pay the cost herein to be taxed, for which execution may issue.

This 29th day of July 1944
J. M. Hare
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.

No. Page

The State Of Alabama

Baldwin County

In Circuit Court, In Equity

vs. Complainant.

Respondent.

DIVORCE DECREE

No. 1115

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Complainant

VS.

Defendant

Commission To Take Deposition

COMMISSIONER:

Witnesses:

1015-

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Complainant _____

VS.

Defendant _____

Commission To Take Deposition

COMMISSIONER:

Witnesses:

ORAL EXAMINATION

I, Virginia Keel, 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— and read over to him and he signed the same in the presence of myself and W. C. Beebe at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness— or had proof made before me of the identity of said witness—; 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 28 day of July, 1944.

Virginia Keel (L. S.)

No. <u>1115</u>	Page _____
THE STATE OF ALABAMA	
Baldwin County	
IN CIRCUIT COURT, IN EQUITY	
Complainant	Respondent
Vs.	ORAL DEPOSITION
Filed <u>July 28</u> , 19 <u>44</u>	
<u>Virginia Keel</u> Register	
RECORDED IN _____	
Vol. _____	Page _____
_____	Register _____

EST-6-40-560

DEMAND FOR ORAL EXAMINATION.

.....,

Complainant,

Vs.

.....,

Respondent.

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

Filed this *3rd* day of *July*,
194*H*.....

R. S. Wacker.....
Register.

ORAL EXAMINATION

I, Edith C. Bowers, 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— and read over to her and she signed the same in the presence of myself and no other witnesses at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness— or had proof made before me of the identity of said witness—; 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 24 day of July, 1944.
Edith Bowers (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

Complainant _____

Vs. _____

Respondent _____

ORAL DEPOSITION

Filed July 29, 1944

[Signature], Register

RECORDED IN

Record _____

Vol. _____ Page _____

Register _____

ALABAMA'S BEST COUNTY'S-

The **BALDWIN**

Times

BEST NEWSPAPER

BAY MINETTE, ALABAMA

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

Ford Cook

_____ , being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Notice to Non-Resident.

NOTICE TO NON-RESIDENT
The State of Alabama, Baldwin County, Circuit Court, in Equity.
This the 10th day of May, 1944.
CLYDE NABER CHRISTIANSEN.
No. 1115.
Vs.
PAUL CHRISTIANSEN.
In this cause it being made to appear to the Clerk of this Court by the affidavit of Clyde Naber Christiansen that the Respondent Paul Christiansen is a non-resident of the State of Alabama and further that in the belief of said affiant the Respondent is over the age of 21 years, it is therefore ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks beginning the said Paul Christiansen answers in demurr to the Bill of Complaint in this cause on the 5th day of June, 1944 or after thirty days therefrom a default confession may be taken against him.
R. S. DUCK,
Register.
BEEBE and HALL,
Solicitors for Complainant. 15-44

COST STATEMENT

157 WORDS @ 4 1/2 cents \$ 6.93

I hereby certify this is correct, due and unpaid (paid)

Ford Cook

Publisher.

Was published in said newspaper for 4 consecutive weeks in the following issues:

Date of 1st publication May 11, 1944 Vol. 55 No. 15
Date of 2nd publication May 18, 1944 Vol. 55 No. 16
Date of 3rd publication May 25, 1944 Vol. 55 No. 17
Date of 4th publication June 1, 1944 Vol. 55 No. 18

Subscribed and sworn before the undersigned this _____ day of _____ 194_____

Notary Public, Baldwin County.

Ford Cook

Publisher.

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

No. _____, Term, 19____

Clyde Naber Christiansen _____ Complainant

Vs.

Paul Christiansen _____ Defendant

Motion is hereby made for a Decree Pro Confesso against _____

Paul Christiansen _____ Defendant

in the annexed stated cause. on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 5th day of July 1944

Beebe & Hall

By: W. Beebe Solicitor.

746 Code

No. _____ Page _____

The State of Alabama,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

Complainant _____

Vs.

Defendant _____

Motion for Decree Pro Confesso
on Publication

Filed July 5th 1944

Produce

Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

CLYDE NABER CHRISTIANSEN,

No. 1115

vs.

PAUL CHRISTIANSEN.

The State of Alabama,

County.

Circuit Court, in Equity

This the 1st day of

May, 1944

In this cause it being made, to appear to the Clerk of this Court by the affidavit of

Clyde Naber, Christianesen

that the Defendant, Paul Christianesen,

is a non-resident of the State of Alabama

and further, that, in the belief of said Affiant the Defendant is over the age of 21

years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper pub-

lished in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring

the said Paul Christianesen.

to answer or demur to the Bill of Complaint in this cause by the 5th day of

June,

1944, or after thirty days therefrom a decree Pro Confesso may be

taken against his/

R S Duck.

Register.

THE STATE OF ALABAMA, }
BALDWIN COUNTY

No. _____, Term, 19____

Complainant _____

Vs.

Defendant _____

In this cause it appears to the Register _____ R. S. Duck _____ that the order of publication

heretofore made in this cause, was published for four consecutive weeks, commencing on the _____

day of May 11, 19____, in the Baldwin Times _____ a newspaper published

in Bay Minette, _____, Alabama, that a copy of said order was posted at the Court House door

in Baldwin _____ County, on the _____ 1st day of May 194____

and _____ June 1st, 194____.

And it now further appearing to the Register _____ R. S. Duck _____ that the said

Paul Christiansen

having, to the date hereof, failed to demur, plead to, or answer the Bill of Complaint in this cause, it is
now, therefore, on motion of Complainant _____, ordered and decreed by the Register _____
R. S. Duck _____ that the Bill of Complaint in this cause be, and it hereby is in all things taken as
confessed against the said _____

Paul Christiansen

This _____ 5th day of JULY 194____

Register _____

R. S. Duck

RECORDED

No. _____ Page _____

The State of Alabama,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

Vs.

Decree Pro Confesso of Publication

Issued July 5th 1914

[Signature]

Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

[Handwritten mark]

Clyde Naber Christiansen

VS.

Paul Christiansen

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, _____

Decree Pro Confesso and Testimony of Complainant's witnesses

and in behalf of Defendant upon _____

Debbie Hall
10/10/10
Debbie Hall

Register.

RECORDED

No. _____

The State of Alabama,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

VS.

NOTE OF TESTIMONY

Filed in Open Court this 19

day of July 1944

[Signature]
Register.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA -- GREETING:

WE COMMAND YOU, that you summon PAUL CHRISTIANSEN to be and appear before the Judge of the Circuit Court of Baldwin County, 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 CLYDE NABER CHRISTIANSEN 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 1st day of May, 1944.

R. S. Duck
Register.

.....

CLYDE NABER CHRISTIANSEN
COMPLAINANT

VS.

PAUL CHRISTIANSEN
DEFENDANT

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

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

Now comes your Complainant, CLYDE NABER CHRISTIANSEN, and humbly complaining against the Defendant PAUL CHRISTIANSEN, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and Defendant are both over the age of twenty-one years; that Complainant is a resident of Bay Minette, Baldwin County, Alabama where she has resided continuously for more than 3 years, that the Defendant is a non-resident of the State of Alabama, residing somewhere in the State of Illinois, his particular place of residence and Post Office address being unknown to this Complainant.

2.

That they were married at Evergreen, Alabama, on the 17th day of September, 1941, and lived together as husband and wife at Bay Minette, in Baldwin County, Alabama, until January, 1944.

3.

That prior to their marriage the Defendant had appeared

to be kind and considerate but within a few months after their marriage he began to stay out late at nights and to come home in a drunken and enraged condition and cursed and abused her and threatened to beat her. Complainant, from his conduct has reasonable cause to believe and does believe that should she continue to live with him he would do her bodily harm attendant with danger to her life or health. Because of such threats she separated from on in January, 1944.

WHEREFORE, the premises considered, your Complainant prays that your Honor will, by proper process, make the said PAUL CHRISTIANSEN, party Defendant, 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 Defendant, and that your Honor will give and grant unto her such other, further or different relief as she may in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

BEEBE & HALL

BY _____
Solicitors for Complainant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me the undersigned Notary Public, in and for said County, in said State, this day personally appeared Clyde Naber Christiansen, who having been by me first duly sworn, deposes and says that she is Complainant in the cause pending in the Circuit Court of Baldwin County, Alabama, in Equity for divorce against Paul Christiansen, that the said Paul Christiansen is a non-resident of the State of Alabama, that she has made diligent search and inquiry but is unable to ascertain his particular place of residence and post office address, that they are both over the age of twenty-one years, that he is 43 years old and is not in the Military Service of the United States Army, but he is somewhere in the State of Illinois.

Clyde Naber Christiansen

Sworn to and subscribed before me on this the

1st day of May, 1944.

W. H. [Signature]
Notary Public, Baldwin County, Ala.

1113-

RECORDED

Complaint

Christison
vs.

Christison

Filed May 10 1944
D. H. H. H.
H. H. H.