

1235

STATE OF ALABAMA  
BALDWIN COUNTY

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

WE COMMAND YOU, that you summon ADOLPH FROST to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery Jurisdiction within thirty days after the service of the summons, and there to answer, plead or demur without oath to a bill of complaint, lately exhibited by Decima Frost, against the said Adolph Frost, 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 of the law, 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 7<sup>th</sup> day of December, 1944.

R. S. Duck  
Register

DECIMA FROST COMPLAINANT	}	IN THE CIRCUIT COURT OF
VS.		BALDWIN COUNTY, ALABAMA
ADOLPH FROST RESPONDENT		IN EQUITY

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

Now comes your Complainant, Decima Frost, and humbly come complaining against the Respondent, Adolph Frost, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Respondent are both bona fide residents of Baldwin County, Alabama, and are over the age of twenty-one years;

2.

That your Complainant and the Respondent were married in Foley, Baldwin County, Alabama, on to-wit, January 15, 1935, and lived together as husband and wife in Baldwin County, until

November 1, 1943;

3.

That on November 1, 1943, the Respondent voluntarily abandoned the bed and board of the Complainant and has remained away voluntarily and continuously since that time;

4.

That there was born to said marriage between your Complainant and the Respondent, three children; Donald Frost, age 7, Adrian Frost, age 5, and Violet Ann Frost, age 2; that said children are now, and have been all their lives, with your Complainant, who is a suitable, fit and proper person to have their care, maintenance and control; that the Respondent is an able bodied man, easily capable of maintaining and supporting the Complainant and the minor children.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Adolph Frost party Respondent to this cause of action, 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;

That your Honor will order a reference to determine a reasonable amount of alimony to be paid by the Respondent to the Complainant, pendente lite and permanent, and also a reasonable attorney's fee to be paid by the Respondent to the Complainant;

Complainant further prays that upon a final hearing hereof your Honor will grant unto her an absolute decree of divorce forever barring the bonds of matrimony existing between her and the Respondent; that she be awarded the custody of the said children, Donald Frost, Adrian Frost and Violet Ann Frost; that your Honor will give and grant unto her such other, further, different or general relief as she may be entitled to receive, and as in duty bound she will ever pray.

BEEBE & HALL

BY: 

Solicitors for the Complainant

1235

ORIGINAL

I have executed this writ by handing a copy to the Respondent Adolph Frost this 28<sup>th</sup> day of Dec 1944 C.E. Garrett Sheriff By John R. Davis D.S.

DECIMA FROST,  
COMPLAINANT  
VS  
ADOLPH FROST,  
RESPONDENT

SUMMONS AND COMPLAINT

Filed this the 27<sup>th</sup> day of November, 1944.

Richard  
Register