

Deposition of Valena K. Reed:

My name is Valena K. Reed and I am the complainant in this cause. I am and was at the time of the filing of the bill in this cause over the age of twenty-one years, and I am a bona fide resident citizen of Fairhope, Baldwin County, Alabama and have been such bona fide resident citizen for more than two years next preceding the filing of the bill of complaint in this cause.

The respondent, Chester A. Reed, is and was at the time of the time of the filing of the bill over the age of twenty-one years, and he is a non-resident of the State of Alabama, his last known place of residence and post office address being "42nd. Street and Indiana Avenue, Chicago, Illinois".

The said respondent and I were lawfully married to each other in the City of Mobile, Alabama on to-wit the 27th. day of January, 1929 and we lived together as wife and husband for a period of about five years, and became separated during the latter part of the year 1933 or the first part of the year 1934, since which time we have not lived together as wife and husband, therefore, I have lived separate and apart from the bed and board of the respondent for more than two years next preceding the filing of my bill in this cause, and without any support whatever from the respondent during said period of two years, and I was a bona fide resident of the State of Alabama, Baldwin County, during all said period of two years. As a matter of fact, I have lived separate and apart from the bed and board of the respondent, and without support from him, ever since we became separated at the time stated above, and I have been a bona fide resident citizen of the State of Alabama, Baldwin County, during all of said period.

Valena K. Reed
Valena K. Reed

Deposition of Barbara I. Williams:

My name is Barbara I. Williams; I am 74 years of age; am a bona fide resident citizen of Fairhope, Baldwin County, Alabama and have been such all my life.

I well know Valena K. Reed, the complainant in this cause; I have known her all her life, and have been living very near to her in Fairhope for some several years back. For the past several years I have seen and talked with her every few days, sometimes daily in her home in Fairhope, and from this contact and association with the complainant I know that she has not lived with Chester A. Reed for more than two years preceding the filing of the bill of complaint in this cause. As a matter of fact, I remember when Valena and the respondent were married in 1929, and I know that they became separated about twenty years ago and they have not lived together since that time, and I know also that she has been living off of her own income during all of this period and has received no support whatever from the respondent during all of this time.

Barbara I. Williams

CERTIFICATE

I, Roselle Finch, the commissioner named in the commission issued out of the Circuit Court of Baldwin County, Alabama by Alice J. Duck, as Register of said Court, hereby certify that under and by virtue of the power conferred on me by the terms of said commission, I, after having first given John N. Allen as Solicitor for the Complainant and Valena K. Reed and Barbara I. Williams, witnesses for the complainant proper notice, did cause and direct them to come before me in the office of John N. Allen, Van Antwerp Building, Mobile, Alabama on April 18th., 1953, and having had them made known to me as the identical persons named in said commission, they were by me sworn to speak the truth, the whole truth and nothing but the truth, and in answer to interrogatories propounded to them by John N. Allen as Solicitor for the Complainant herein, they testified as is hereinabove set out, and their testimony was by me reduced to writing as nearly as might be in the identical language of said witnesses, and having been read over by them and to them by me, they in my presence and in the presence of each other subscribed their names to said testimony as correct as testified by them. The respondent having failed to answer, plead or demur and having waived notice of the taking of testimony was not present in person or by counsel, no cross-examination was had.

I do hereby certify that I am not of counsel nor of kin to any of the parties to this cause, and I am not in anywise interest in the result thereof.

Dated April 18th., 1953

Roselle Finch

Commissioner.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Anne E. Holder and/or Rosella Finch

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, (complainant)
to call before you and examine Valena K. Reed and Barbara I. Williams,

as witnesses in behalf of complainant in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein Valena K. Reed is

XXComplainant
and Chester A. Reed is

Respondent

on oath, to be by you administered, upon said named witnesses,
to take and certify the depositionS of the witnesses and return the same to our Court, with all
convenient speed, under your hand.

Witness 25th day of February, 1953

Alice J. Duck

Register.

Commissioner's Fee, \$5.00; not paid.

Witness' Fees, \$

2927

THE STATE OF ALABAMA, BALDWIN COUNTY

VALENA K. REED,	:	
Complainant,	:	C I R C U I T C O U R T
No. 2927 -vs-	:	IN EQUITY
CHESTER A. REED,	:	AT BAY MINETTE, ALABAMA
Defendant.	:	

DECREE OF DIVORCE

This cause is submitted for decree on the pleadings, decree pro confesso and the testimony as shown by the note of submission on file, and, on consideration, it is ordered, adjudged and decreed by the Court that the Complainant is entitled to relief, and that the bonds of matrimony heretofore existing between the Complainant and the Defendant be and the same are henceforth dissolved and annulled.

It is further ordered and decreed that the Complainant and Defendant be and are hereby permitted to again contract marriage, subject to such provisions of the law as regulate the marriage of divorced persons, and in no event before the expiration of sixty days after the rendition of this decree.

It is further ordered and decreed that the Complainant be and she is hereby granted the right to resume her maiden name.

It is further ordered that Complainant pay the costs of this suit, for which execution may issue.

Dated this 19 day of June, 1953.

Hubert M. Hall
Judge.

TO THE HONORABLE TELFAIR MASHBURN, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA; SITTING IN EQUITY:

Complainant, Valena K. Reed, brings this her bill of complaint against her husband, Chester A. Reed, as respondent, and respectfully represents unto your Honor as follows:

1. That complainant is over the age of twenty-one years and is a bona-fide resident citizen of Baldwin County, Alabama, and has been such bona-fide resident citizen for more than two years next preceding the filing of this bill of complaint; and that the respondent, Chester A. Reed, is over the age of twenty-one years and is a non-resident of the State of Alabama, his last known place of residence and post-office address being "42nd Street and Indiana Avenue, Chicago, Illinois".

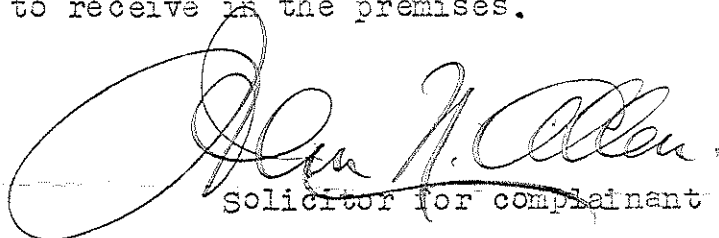
2. That complainant and respondent were lawfully married to each other in the City of Mobile, Alabama, on the 27th day of January, 1929, and they lived together as wife and husband for a period of about five years immediately following said marriage, at the expiration of which said period they became separated.

3. That complainant has lived separate and apart from the bed and board of her said husband, Chester A. Reed, the respondent, and without support from him for more than two years next preceding the filing of this bill of complaint, and she has bona-fide resided in this the State of Alabama during all of said period.

4. That no children were born of the aforesaid marriage.

WHEREFORE, the premises considered, complainant prays that the said Chester A. Reed be made party respondent to this bill of complaint; that appropriate process be issued and served upon him, in the manner as as by law provided, requiring him to plead, answer or demur to the allegations of this bill of complaint within the time required by law; and that, upon the final hearing of this cause, your Honor will render and enter a decree dissolving forever the bonds of matrimony now existing between complainant and respondent, and granting to complainant the right to ^{re-marry and to} resume her maiden name.

And complainant prays for such other and further relief as she may be entitled to receive in the premises.


Solicitor for complainant

NO 2927

RECORDED

Valena K. Reed

vs.

C. Hester R. Reed

Bill of Complaint

Filed 11-19-52

Alice J. Luck
Registrar

The **BALDWIN**
Times
ALABAMA'S BEST COUNTY'S- BEST NEWSPAPER
BAY MINETTE, ALABAMA

NOTICE TO NON-RESIDENT
The State of Alabama, Baldwin County
Circuit Court, in Equity
This the 27th day November, 1952
VALENA K. REED
No. 2927

vs.
CHESTER A. REED

In this cause it being made to appear to the Clerk of this Court by the affidavit of Valena K. Reed that the defendant Chester A. Reed 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 published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring Chester A. Reed, the said Defendant to answer or demur to the Bill of Complaint in this cause by the 21st day of December, 1952 or after thirty days therefrom a decree Pro Confesso may be taken against him.

ALICE J. DUCK
Register.

John N. Allen
Solicitor for Complainant

45-41c

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

Jimmy Faulkner, 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

Valena K. Reed vs. Chester

A. Reed

COST STATEMENT

157 WORDS @ 6 1/2 cents --- \$ 10 20
I hereby certify this is correct, due and unpaid (paid).

Jimmy Faulkner
Publisher.

Was published in said newspaper for 7 consecutive weeks in the following issues:

Date of 1st publication Nov. 27, 1952 Vol. 63 No. 45

Date of 2nd publication Dec. 4, 1952 Vol. 63 No. 46

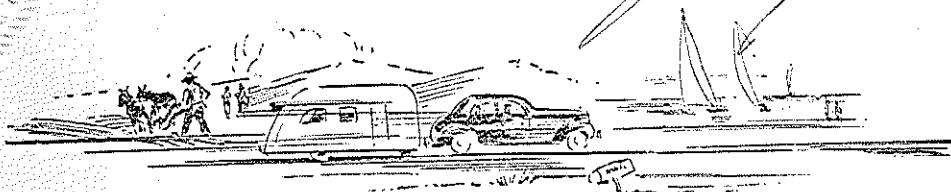
Date of 3rd publication Dec. 11, 1952 Vol. 63 No. 47

Date of 4th publication Dec. 18, 1952 Vol. 63 No. 48

Subscribed and sworn before the undersigned this 18 day of Dec, 1952

Dorothy Martin
Notary Public, Baldwin County.

Jimmy Faulkner
Publisher.



THE STATE OF ALABAMA,
Baldwin County

CIRCUIT COURT, IN EQUITY

No. 2927, Term, 19 VALENA K. REED

Complainant

Vs.

CHESTER A. REED

Defendant

Motion is hereby made for a Decree Pro Confesso against

CHESTER A. REED

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 23rd day of February, 1953.

746 Code


Solicitor for
Complainant

RECORDED

No. 2927 Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

VALENA K. REED

Complainant

Vs.

CHESTER A. REED

Defendant

Motion for Decree Pro Confesso
On Publication

Filed 2.23., 1953

Archie J. French
Register.

Recorded in Record

Vol. Page

Register.

The Baldwin Times, Bay Minette, Ala.

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

No. 2927, Term, 1952VALENA K. REED

Complainant

Vs.

CHESTER A. REED

Defendant

In this cause it appears to the Register Alice J. Duck that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 27th day of November, 1952, in the Baldwin Times a newspaper published in Bay Minette, Alabama, Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the 27th day of Nov 1952 and

And it now further appearing to the Register Alice J. Duck, that the said Chester A. Reed

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 Alice J. Duck that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said Chester A. Reed

This

23rd

day of

Feb1953

Register.

No.

RECORDED

Page

The State of Alabama,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

VALENA K. REED

Vs.

CHESTER A. REED

Decree Pro Confesso of Publication

Issued

2-23

1953

Archie J. Hester
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

Moore Printing Co., Bay Minette, Ala.

JOHN N. ALLEN
ATTORNEY AT LAW
VAN ANTWERP BUILDING
MOBILE, ALABAMA

February 24, 1953.

Mrs. Alice J. Duck,
Register, Circuit Court,
Bay Minette, Alabama.

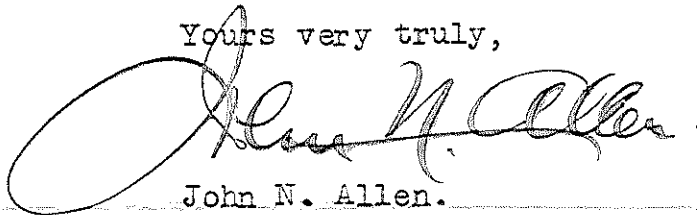
Dear Madam: Re: Valena K. Reed vs. Chester A. Reed:

I am enclosing herewith, for filing, affidavit of complainant showing the non-military status of the respondent, Chester K. Reed, and respectfully request the entry of a decree pro confesso against the respondent on proof of publication, which I am assuming has been filed.

I am enclosing also, for filing, a Demand for Oral Examination of complainant's witnesses. If convenient to you, I should appreciate it very much if you would forward the Commission to me sometime during to-morrow, as I am anxious to take depositions during this week.

With kind regards, I am,

Yours very truly,

A handwritten signature in cursive script, appearing to read "John N. Allen", is written over a horizontal line. The signature is fluid and somewhat stylized, with a large loop at the beginning.

John N. Allen.

JNA-A

Enclosures (2)

Valena K. Reed,

IN THE CIRCUIT COURT

Plaintiff.

OF
BALDWIN
~~MOBILE~~ COUNTY, ALABAMA.
IN EQUITY.
~~XXXXXX~~

VS.

Chester A. Reed,

NO. _____

Defendant.

NON-MILITARY AFFIDAVIT.

STATE OF ALABAMA

COUNTY OF MOBILE

NOW comes, Valena K. Reed,

who being first duly sworn, deposes and says that the defend-
ant herein, Chester A. Reed,

was not at the time of the filing of this suit, and is not now,
in the Military or Naval Service of the United States.

The Defendant ~~xxxxxx~~ last known place of residence
and post-office address is 42nd Street and Indiana Avenue,
Chicago, Illinois.

Valena K. Reed

Valena K. Reed

Sworn to and subscribed before me;
this the 23 day of February,
1953.

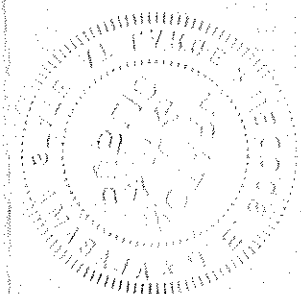
J. J. Gooden
Notary Public, ~~Mobile County~~, Alabama,
MY COMMISSION EXPIRES MARCH 15, 1954.

State at Large

Filed _____,

REGISTER CLERK.

Blond Brown
July 9th.



FILED

FEB 25 1953

ALICE J. DUCK, Register

Valena K. Reed,
Complainant,

-vs-

Chester A. Reed,
Respondent.

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

State of Alabama,

Mobile County.

Before me, John N. Allen, a Notary Public in and
for said State and County, personally appeared Valena K. Reed,
who is known to me, and who, being by me first duly sworn de-
poses and says as follows:

"My name is Valena K. Reed; I am over the age of twenty
one years and am a bona-fide resident citizen of the County of
Baldwin, State of Alabama, and have been such bona-fide resident
citizen for more than two years next preceding the filing of
the bill of complaint in this cause, in which cause I am complainant.

"The respondent, Chester A. Reed, my husband, is over the
age of twenty-one years and is a non-resident of the State of
Alabama, his last known place of residence and post-office address
being '42nd Street and Indiana Avenue, Chicago, Illinois'.

Valena K. Reed

Subscribed and sworn to before me this 18th day of
November, 1952.



Notary Public, Mobile County, Alabama.

JOHN N. ALLEN
ATTORNEY AT LAW
VAN ANTWERP BUILDING
MOBILE, ALABAMA

April 17th, 1953.

Mrs. Alice J. Duck,
Register, Circuit Court,
Bay Minette, Alabama.

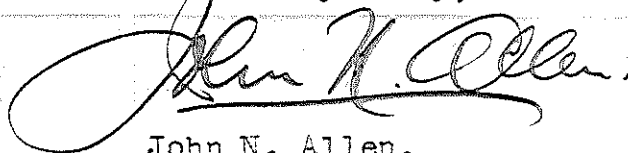
Dear Mrs. Duck:

I have your postal advising that the case of Valena K. Reed vs. Chester A. Reed is set for the 22nd inst., for which I wish to thank you.

I have taken the testimony in this case and it is all ready for submission for final decree except for one inadvertence. This complainant has been separated from her husband for twenty or more years, and for many years past she has been going by the name of "Valena Kirkman", and it has just been discovered that she signed her testimony in the name of Valena Kirkman, her maiden name, instead of Valena K. Reed, her marriage name. Of course, it is necessary that she re-appear before the Commissioner and sign the testimony in her marriage name, and I have this day written her requesting that she come in as soon as possible and re-sign her testimony before the Commissioner. It may be that I cannot have the testimony re-signed in time to submit the case on the 22nd, but I am sure that I can have it attended to some time during next week. Therefore, in event the case is not ready for submission on the 22nd, I request that you kindly explain the circumstances to Judge Hall and ask him to pass it on the 22nd, with the understanding that I will exert every effort to submit the case in the very near future, without a definite setting.

Thanking you for all courtesies, I am, with kind regards,

Yours very truly,



John N. Allen.

JNA-A

Valena K. Reed,

Complainant

No. Vs.

Chester A. Reed,

Defendant

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

DEMAND FOR ORAL EXAMINATION

The State of Alabama, }
Mobile County }

The COMPLAINANT requests the oral examination of the following named witnesses
on her behalf, viz: Valena K. Reed (complainant) and B. I.

Williams;

said witnesses reside in the County of Baldwin, State of Alabama.
and/or Roselle Finch,

Anne E. Holder/ who reside at Mobile, Mobile County, Alabama,

is suggested as suitable persons to be appointed Commissioners to take deposition s of said witness es
on such oral examination.

Filed _____

~~JAMES A. CRANE, Register.~~


Solicitor for Complainant.

No.

BALDWIN
CIRCUIT COURT OF MOBILE COUNTY,
Mobile, Alabama
DAY NINETTE,

Vs.

DEMAND FOR ORAL EXAMINATION

FILED

FEB 25 1953

ALICE J. DUCK, Register

NOTICE TO NON-RESIDENT

The Baldwin Times, Bay Minette, Alabama

Valera K. Reed

No. 2927

The State of Alabama.

Baldwin County.

VS.

vs.
Chesters A. Reed

Circuit Court, in Equity

This the 21st day of

Nov 1943

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

Valencia H. Reed

that the Defendant

Chester A. Reed

is a non-resident of the State of Alabama

and further, that, in the belief of said Affiant_____the Defendant_____15_____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, requiring

Chester A. Reed the said Defendant

to answer or demur to the Bill of Complaint in this cause by the 21st day of December 1947, or after thirty days therefrom a decree Pro Confesso may be taken against him

George F. Rensselaer

Register.

John M. Allen
Sol. for complainant

JOHN N. ALLEN
ATTORNEY AT LAW
VAN ANTWERP BUILDING
MOBILE, ALABAMA

May 14, 1953.

Mrs. Alice J. Duck,
Register, Circuit Court,
Bay Minette, Alabama.

Dear Mrs. Duck: Reed -vs- Reed:

I am enclosing herewith the following, viz.:

1. Depositions of Valena K. Reed and Barbara I. Williams, witnesses examined on behalf of complainant before Roselle Finch, Commissioner.

2. Order of Submission and Note of Evidence.

Please submit this case for final decree; also, please forward your cost bill, in which should be included the Commissioner's fee of \$5.00.

Thanking you, I am,

Yours very truly,



John N. Allen.

JNA-A

P.S. Please forward ~~cc~~ copy of decree -

Valena K. Reed,
Complainant,

No. _____ VS. }

Chester A. Reed,
Respondent.

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

ORDER OF SUBMISSION

This cause coming on to be heard, is submitted for decree on the pleadings and on the proof as noted.

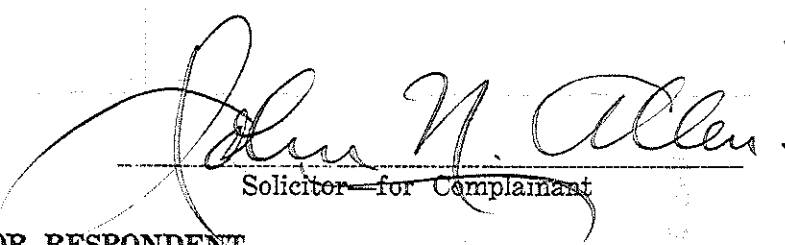
Dated, May 14, 1953. —

NOTE OF EVIDENCE

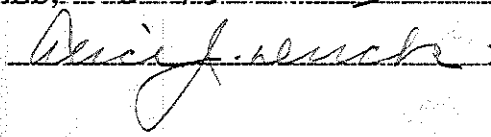
At the hearing of this cause the following note of evidence was taken to wit:

FOR COMPLAINANT

1. Bill of complaint;
2. Decree pro confesso;
3. Depositions of Valena K. Reed (complainant) and Barbara I. Williams.


Solicitor—for Complainant

FOR RESPONDENT

FILED, 35-155- 53
 Register }

Solicitor—For Respondent

No. 2927

Valera K. Reed,
Complainant,

Vs.

Chester A. Reed,
Respondent.

ORDER OF SUBMISSION
NOTE OF EVIDENCE

Terms, 19

, 19

Ent. Min. No., Page

JOHN N. ALLEN
ATTORNEY AT LAW
VAN ANTWERP BUILDING
MOBILE, ALABAMA

November, 1952.

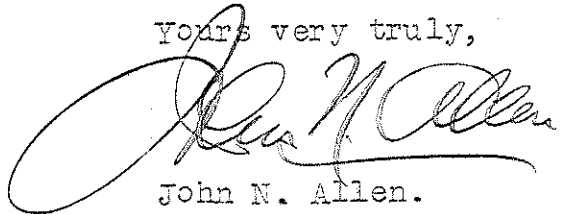
Mrs. Robert S. Duck,
Clerk, Circuit Court,
Bay Minette, Alabama.

Dear Mrs. Duck:

I am enclosing herewith, for filing, bill of complaint in the case of Valena K. Reed vs. Chester A. Reed, together with affidavit of non-residence of the respondent. Please have notice published in The Baldwin Times, and have the Times send me bill for advertising.

With kind regards, I am,

Yours very truly,

A handwritten signature in dark ink, appearing to read "John N. Allen", with a large, sweeping flourish extending from the end of the signature.

John N. Allen.

JNA-A

VALENA K. REED, :
Complainant, :
No. 2927 -vs- : CIRCUIT COURT OF BALDWIN COUNTY,
CHESTER A. REED, : ALABAMA; IN EQUITY.
Defendant. :

DECREE PRO CONFESSO ON PUBLICATION

In this cause, Complainant, by her Solicitor, presents the Certificate of the Register showing that publication has been properly made and perfected against the Defendant, Chester A. Reed, as required by law; and it appearing that more than 30 days have elapsed since the period specified in the Order of Publication, and that the above named Chester A. Reed has failed to appear and plead, answer or demur to the allegations of the Bill of Complaint on file, it is ordered that the same be taken as confessed against the said Chester A. Reed, defendant.

Dated this _____ day of February, 1953.

Judge.