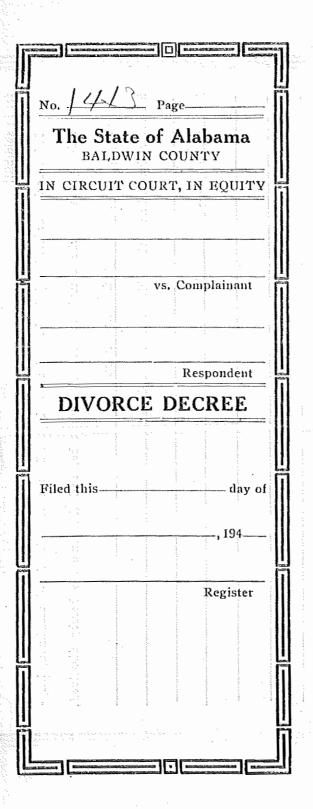
THE STATE OF ALABAMA, BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

This cause coming on to be heard was submitted upon Bill of Complaint, Decreation States, Answer & Waiver of the Respondent and Testimony as noted by the Register, and uponsideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayer in said bill. It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony here fore existing between the Complainant and Defendant be, and the same are hereby, dissolved and that the said Sadie Mae Prost forever divorced from the said Roval Prost or and on account of Cruelty. It is further ordered, adjudged and decreed that neither party to this suit shall again markept to each other until sixty days neither party shall again mary except to each other during the pendency of said appeal. It is further ordered that the Complainant and Respondent be, and they are hereby permitted again contract marriage upon the payment of the cost of this suit. It is further ordered that Teoret pay shall again mary except to each other during the pendency of said appeal. It is further ordered that Teoret pay shall prost the cost of this suit. It is further ordered that Teoret pay the cost herein to be taxed, for which execution may issue. This This This pay the cost herein to be taxed, for which execution may issue. This This day of This Aday of This pay the cost herein to be taxed, for which execution may issue. Court of Baldwin County, Alabama, do bereby 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 This day of The Register of Circuit Court, in Equity and The Register of Circuit Court, in Equity The Regi	4	SA	DIE MAE FROST	Complainant	
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THE STATE OF ALABAMA, Baldwin County.

Circuit Court of Baldwin County, Alabama (In Equity)

•		SADIE MAE FROST	Complainant
		VS.	
		ROYAL FROST	Respondent
Ι	Lillian Pat	terson	
•	and caused to	onersadie Mae	Frost
Sanda a Maria			
witnessat	named in the I	Requirement for Oral Examination	on, on the 24th day of September
in Bay Mi	nette	, Alabama, and having first s	sworn said Witness to speak the
truth, the w		nothing but the truth, the said - doth depose and say as foll	

My name is Sadie Mae Frost. I am over twenty-one years of age, and a bona fide resident of Baldwin County, Alabama; the Respondent is over twenty-one years of age and a bona fide resident of Baldwin County, Alabama. I have lived in Baldwin County, Alabama, continuously for the past 12 years; the Respondent and I are husband and wife, having married at Pensacola, Florida, on May 3, 1944. I am 45 years of age, and the Respondent is 53 years of age. Soon after the Respondent and I married, I insisted that he locate and furnish me a home so that we could live together peaceably; the Respondent never did furnish me with a home, we just met from time to time and always the conduct of the Respondent was such as to give me every reasonable apprehension to believe, and I did actually believe that if I continued to live with him he would carry out his threats and do actual violence to my person, which would necessarily endanger my life and health. I found out immediately after I married that the conduct of the Respondent toward me was such that I could not endure, however, I made every effort to live with him, but conditions grew worse from time to time until I came to the conclusion that it was absolutely impossible for us to live together.

Salis May Front

I, Lillian Patterson , as Registercand Commissioner hereby certify
that the foregoing deposition—on Oral Examination was taken down by me in writing in the words
of the witness—and read over to <u>her</u> and she signed the same in the presence of myself and H. M. Hall
at the time and place herein mentioned; that I have personal knowledge of personal identity of
said witness—or had proom 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 24th day of September, 1945. Lilian Patterson (L. S.)
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STATE OF ALABAMA, BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

WE COMMAND YOU that you summon ROYAL FROST to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction, within thirty days after the service of summons, and there to plead, answer or demur, without oath, to a bill of complaint lately exhibited by SADIE MAE FROST against the said ROYAL FROST, and further to do and perform what the said Judge shall order and direct in that belalf, 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 Court, this the 4 day of September, 1945.

SADIE MAE FROST,

COMPLAINANT,

VS.

ROYAL FROST,

COMPLAINANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

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

Your Complainant, SADIE MAE FROST, respectfully represents and shows unto your Honor and this Honorable Court as follows:

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

That your Complainant and the Respondent married at Pensacola, Florida, on May 3, 1944, and lived together as husband and wife until January 18, 1945;

That on to-wit, January 18, 1945, and at various times prior thereto, the Respondent abused the Complainant and threatened to do 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.

WHEREFORE, the premises considered, Complainant prays that your Honor will by proper process, make the said Royal 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.

Complainant further prays that your Honor will, upon the hearing hereof, enter an order and decree, granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; Complainant prays for such other, further, different, or 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

v. Vin

Solicitors for the Complainant.

RECORDED

SADIE MAE FROST,

COMPLAINANT,

VS.

ROYAL FROST,

RESPONDENT.

SUMMONS AND COMPLAINT.

2000 pt 24 1945

SADIE MAE FROST,

COMPLAINANT,

VS.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,

IN EQUITY.

ROYAL FROST,

RESPONDENT.

Now comes the Respondent and accepts service of summons and complaint in this cause.

The Respondent admits the allegations as to ages, residents, and marriage, but denies all allegations as to cruelty and demands strict proof of the same.

The Respondent waives notice of the time of taking testimony on behalf of the Complainant; the right to cross examine Complainant's witnesses, and agrees that this cause be submitted forwith for final decree without notice.

STATE OF ALABAMA, BALDWIN COUNTY.

I, H. M. HALL, a Notary Public, in and for said County, in said State, hereby certify that Royal 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, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 22nd day of September,

1945.

Notary Public, Baldwin County, Ala.

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AECORDED

SADIE MAE TROST,

COMPLAINANT,

VS.

ROYAL FROST,

RESPONDENT.

ANSWER AND WATVER

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THE STATE OF ALABAMA, BALDWIN COUNTY

Circuit Court

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Circuit Court	in Baldwin County, of said S	tate, wherein	Sadie Ma	le Frost	
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					Respondent
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on oath, to b	e by you administered, upon	Daute	Mae Frost	· · · · · · · · · · · · · · · · · · ·	
to take and ce	ertify the deposition of the	witness and	l return the same	to our Cour	t, with all convenient
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Filed in Open Court this

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