

1413

THE STATE OF ALABAMA, BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

SADIE MAE FROST

Complainant

VS.

ROYAL FROST

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on Answer & Waiver of the Respondent 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 Sadie Mae Frost

is forever divorced from the said Royal Frost

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 the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Royal Frost the Respondent pay the cost herein to be taxed, for which execution may issue.

This 25th day of September, 1945

J. W. 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. 1413 Page _____

The State of Alabama
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

vs. Complainant

Respondent

DIVORCE DECREE

Filed this _____ day of

_____, 194_____

Register

1413

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

SADIE MAE FROST Complainant

VS.

ROYAL FROST Respondent

I, Lillian Patterson
as ~~Register and~~ Commissioner
have called and caused to come before me Sadie Mae Frost

witness named in the Requirement for Oral Examination, on the 24th day of September
1945, 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 Sadie Mae Frost
doth depose and say as follows:

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 twentyone 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 threatening toward me. 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.

Sadie Mae Frost

ORAL EXAMINATION.

I, Lillian Patterson, as ~~Register and~~ 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 her 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.

Lillian Patterson (L. S.)

NO. 1415 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Just

vs.

Just Complainant

Respondent.

Oral Deposition

Filed 24th Sept, 1945

H. M. Hall, Register.

Recorded in _____ Record

Vol. _____ Page _____, Register.

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 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 Court, this the 24 day of September, 1945.


Register

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:

1.

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

2.

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;

3.

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

By: *F. M. Hall*

Solicitors for the Complainant.

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RECORDED

SADIE MAE FROST,

COMPLAINANT,

VS.

ROYAL FROST,

RESPONDENT.

SUMMONS AND COMPLAINT.

Subscribed and sworn to before me this 24th day of September 1945.
R. J. [Signature]
[Signature]

SADIE MAE FROST,
COMPLAINANT,

VS.

ROYAL FROST,
RESPONDENT.

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

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.

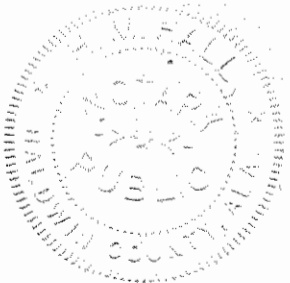
Royal Frost

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.

H. M. Hall
Notary Public, Baldwin County, Ala.



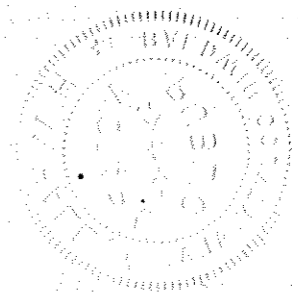
1413

RECORDED

SADIE MAE FROST,
COMPLAINANT,
VS.
ROYAL FROST,
RESPONDENT.

ANSWER AND WAIVER

Accepted 24 1945
R. H. Pugh



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THE STATE OF ALABAMA, }
BALDWIN COUNTY

Circuit Court

To Lillian Patterson

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 Sadie Mae Frost

as witnesses in behalf of the Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Sadie Mae Frost

Complainant

and Royal Frost

Respondent

on oath, to be by you administered, upon Sadie Mae Frost to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 24 day of Sept, 1945

R. Jones
Register

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. 1413

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

VS. Complainant

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

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SADIE MAE FROST

COMPLAINANT

vs.

ROYAL FROST

RESPONDENT

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, _____
Answer and Waiver of the Respondent, and testimony of Sadie Mae Frost.

and in behalf of Defendant upon _____

Register.

RECORDED

No.

1413

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Just

vs.

Just

NOTE OF TESTIMONY

Filed in Open Court this 24

day of Sept, 1945

Prudal
Register.