

B 289
1920

IN THE CIRCUIT COURT
NO. 2
BALTIMORE CITY.

Nathaniel Adams

VS.

Hattie Adams.

1328 7th St. Calver St.

BILL FOR DIVORCE,
A VINCULO MATRIMONII.

No 19262 B

Mr. Clerk: ---

Please file &c.,

Raymond
Solicitor for Plaintiff,
Ad. 2nd St. Paul Pk.
June 1920

*

Nathaniel Adams

*

VS.

IN THE CIRCUIT COURT
NO. 2
BALTIMORE CITY.

*

Hattie Adams

*

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully says:

FIRST: That the parties hereto were married in Baltimore City, State of Maryland, on or about the 15th day of September 1906, and lived together as man and wife until on or about the 3rd day of September 1911.

SECOND: That both parties are residents of Baltimore City, State of Maryland, and have been for more than two years prior to the filing of this Bill of Complaint.

THIRD: That though the conduct of your Orator towards his said wife, has been kind, affectionate, and above reproach, she without any just cause or reason abandoned and deserted him and has declared her intentions to live with him no more; that such abandonment has continued uninterruptedly for more than three years, was deliberate and final, and the separation of the parties is beyond any reasonable hope or expectation of a reconciliation.

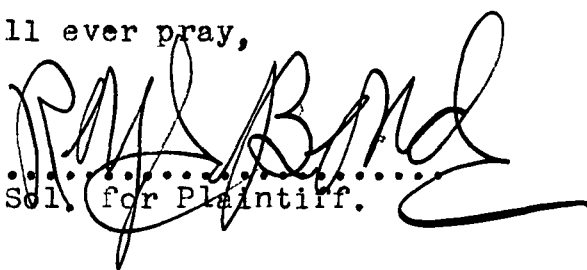
FOURTH: That there are no children as the result of said marriage.

WHEREFORE YOUR ORATOR PRAYS:

- a- A divorce, A Vinculo Matrimonii, from the defendant.
- b- Such other and further relief as the case may require.

May it please your Honor, to grant unto your Orator, the writ of subpoena, directed unto the said defendant, commanding him to be and appear in this Court, in person or by solicitor, on some day certain, to be therein named, and perform such decree, as may be passed in the premises.

As in duty bound, he will ever pray,


.....
Sol. for Plaintiff.

19

Ct. Ct. No. 2

289
1920

B Docket No. 29

Adams

vs.

Adams

Subpoena to Answer Bill of Complaint

Pr

No. 19262B
2

Copy - copied

Filed 14 June, 1920
Roy L. Bond
Solicitor.

4488

10

Thomas F. McMurtry
Sheriff

Wm Earl
(Kelly)

EQUITY SUBPOENA

The State of Maryland

To

Hattie Adams 1328 W^o Callooh St

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you be in your person before the Circuit Court No. 2 of Baltimore City, at the Court House in said city, on the second Monday of *June*, 192*0*, to answer the complaint of

Nathaniel Adams

against you in said Court exhibited. HEREOF fail not, as you will answer to the contrary at your peril:

WITNESS, the Honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *10th* day of *May*, 192*0*

Issued the *2nd* day of *June*, in the year 192*0*

John Pleasant
Clerk.

NOTICE TO THE PERSON SUMMONED:

“Personal attendance in Court on the day named in the above Writ is not required; but unless within such number of days thereafter as the law limits, legal defense is made to the above mentioned suit a judgment by default may be entered against you.”

“The Defendant is required to file his Answer or other Defense in the Clerk’s Office within fifteen days after the return day.”

Ct. Ct. No. 2

289
1920

B

Docket No. 29

Adams

vs.

Adams

Subpoena to Answer Bill of Complaint

Copy

No.

Filed, 192

Solicitor.

EQUITY SUBPOENA
The State of Maryland

To



Hattie Adams

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TRUE COPY TEST

John Pleasant

CLERK.

B 289 / 1920

In Circuit Court
no 2 st

Baltimore City

Malharied Adams

vs

Walter Adams

Answer to Bill of Complaint

Mr Clerk please file

(J. Steward Davis)

No 19262 B.
3

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BALTIMORE, MD.

Filed June 1920

Nathaniel Wells

In The Circuit Court No.2

Vs.

of

Hattie Wells

Baltimore City.

To The Honorable, The Judge of Said Court:

The answer of your respondent to the bill of complaint of the plaintiff, exhibited respectfully says:

Your respondent admits first, second and fourth paragraphs of the above entitle bill.

SECOND, She neither denies or admits the allegations as contained in the third paragraph, but insists on the strictest legal proof thereon.

As in duty bound,

(C. E. Jones)

att. for defendant

230 ✓
Circuit Court No 2.

489
1920 *J* Docket 29

Nathaniel Adams

vs.

Hattie Adams

Sapp
Petition for Leave to Take
Testimony and Order of
Court Thereon.

22nd June 1920

No. 19262 B
H

Filed *22nd June*, 1920

.....Nathaniel Adams.....

vs.

.....Hattie Adams.....

The

IN THE

Circuit Court No. 2,

OF

BALTIMORE CITY.

**To the Honorable the Judge of the
Circuit Court No. 2 of Baltimore City:**

THE PETITION OF.....Nathaniel Adams, Plaintiff.....

in this case, respectfully shows that he desires to take testimony in this case, and respectfully prays that leave be granted him to do so before one of the Standing Examiners of this Court.

Raymond Bond
Solicitor for Plaintiff

ORDERED, this *22nd* day of *June*, 19*20*, that leave be granted to the parties to the cause, to take testimony, as prayed, before any one of the Standing Examiners of this Court.

Walter P. Dairman

~~1917~~
289

Cir. Ct. No. 2.

Docket No. 293.

Nathaniel Adams

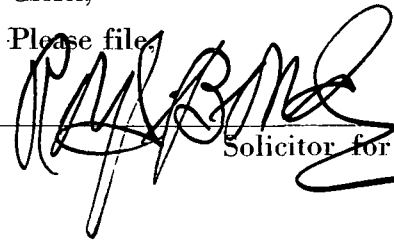
vs.

Hattie Adams.

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file


Solicitor for Plaintiff.

No. 19262B
6

Filed 31 July 1917

Nathaniel Adams
Hattie vs. Adams

**In the Circuit Court No. 2
Of Baltimore City.**

July TERM 1920

To the Honorable

The

Judge of Said Court:

The above cause is respectfully submitted for
decree and the 43rd General Equity Rule is hereby waived.

Raymond Bond
Solicitor for Plaintiff,

(C. J. Jones)
Solicitor for Defendant.

Ct. Ct. No. 2

289
1920

B Docket No. 29

Adams

vs.

Adams

**Order of Reference
and Report**

Robinson

No. 19262 B
7-9 ✓

Order Filed 31 day of July 1920
Report Filed 4 day of July 1920

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

Harriette Adams

vs.

Harriette Adams

July Term, 1920

This case being submitted, without argument, it is ordered by the Court, this *31st* day of *July*, 1920, that the same be and it is hereby referred to _____, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

James P. Gorter

Report of Auditor and Master

Bill filed by husband against wife for divorce A Vinculo Matrimonii for abandonment of three years. Code Article 16, Section 36. Defendant appears by Solicitor and answers, authority in writing. Proof shows marriage, residence and abandonment for, at least, three years continuous, deliberate, final and without hope of reconciliation. Case submitted and ready for decree.

Alex. W. Webster
Auditor and Master.

IN THE CIRCUIT COURT
NO. 2.
BALTIMORE CITY.

B289
1921

ADAMS.

vs

ADAMS.

AUTHORITY.

No. 19262 B.
8

Id. H. August 1920

Baltimore Md

June 11, 1920

I hereby authorize J. Stewart
Davis to appear for me as
my attorney in Nathaniel
Adams vs Walter Adams
Circuit Ct. No. - Baltimore
City

Harriet Adams

Circuit Court No. 2

B

B 289
1920

No.

Docket

Nathaniel Adams

vs.

Hattie Adams.

DECREE OF DIVORCE.

1st August 1920

pd
P

R

No.

19262 BV
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copy - copied 127

Filed

1st August

, 1920

DECREE OF DIVORCE.

IN THE

Circuit Court No. 2

OF

BALTIMORE CITY.

Nathaniel Adams

vs.

Hattie Adams.

July Term, 1920.

This cause standing ready for hearing and being duly submitted, the proceedings were by the Court read and considered.

It is thereupon, this 5th day of August, Anno Domini, one thousand nine hundred and twenty

by the CIRCUIT COURT No. 2 OF BALTIMORE CITY, Adjudged, Ordered and Decreed, that the said Nathaniel Adams

the above named complainant be, and he is hereby DIVORCED A VINCULO MATRIMONII, from the defendant. Hattie Adams.

And it is further Ordered, that the said plaintiff pay the cost of this proceeding.

I, JOHN PLEASANTS, Clerk of the Circuit Court No. 2 of Baltimore City, do hereby certify that the above is a true copy of the decree taken from the record of proceedings in said cause.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of the said Court, this day of 1920

Clerk Circuit Court No. 2 of Baltimore City.

This is a proper decree.

Alexander Auditor and Master.

3/12/3/24

Doc. B 289
1920

In the Circuit Court, No. 2
OF BALTIMORE CITY

DEPOSITIONS

Nathaniel Adams

vs.
Hattie Adams

No. 19262 J.

PLAINTIFF'S COSTS

Examiners \$ 8⁰⁰

Copies _____

Sheriff _____

Stenographer 1⁰⁰

\$ _____

DEFENDANT'S COSTS

Examiners \$ _____

Copies _____

Sheriff _____

Stenographer _____

\$ _____

Ad 20 July 1920

31 July 1920

Mathaniel Adams

vs.
Wattie Adams

In the Circuit Court No 2
OF BALTIMORE CITY.

The above cause being at issue

and notice having been given me by the Solicitor for the plaintiff
of a desire to take testimony in the same, I, A. de RUSSY SAPPINGTON, one
of the Standing Examiners of the Circuit Courts of Baltimore City, under and by
virtue of an order of the above named Circuit Court, passed in said cause on the
twenty-second day of June 1920, met on
the twenty-eighth day of June in the year nineteen
hundred and twenty at my office, in the City of Baltimore, in the State
of Maryland, and assigned the twenty-ninth day of June
in the same year at three o'clock in the after-noon and the
office of Coy S. Bond, Esq - in the City and State
aforesaid, as the time and place for such examination of witnesses in said cause;
at which last mentioned time and place I attended, due notice of such meeting
having been given, and proceeded in the presence of the Solicitor.....of the
plaintiff.....to take the following depositions, that
is to say:—

8-1

ADAMS)
(
vs.)
(
ADAMS.)

Testimony taken at the office of Roy S. Bond,
Esquire, 215 St. Paul Place, Baltimore, Maryland, June
1920, at three o'clock p. m.

NATHANIEL ADAMS,

the plaintiff in this case, having been first duly sworn,
was examined and testified as follows:

QUESTIONS BY THE EXAMINER:

1Q. State your name, residence and occupation.

A. Nathaniel Adams; 1214 1/2 Pennsylvania Avenue;
stevedore.

2Q. Do you know the parties to this suit?

A. Yes, I am the plaintiff and my wife is the de-
fendant.

QUESTIONS BY MR. BOND:

3Q. Mr. Adams, when, where and by whom were you
married, please?

Nathaniel Adams.

A. I was married on the 15th day of September,
1906.

4Q. By whom?

A. By the Rev. Mr. Watkins.

5Q. Was the Rev. Mr. Watkins a regularly ordained
minister of the Gospel?

A. Yes.

6Q. Connected with what faith?

A. Baptist.

7Q. Preaching at what church?

A. Union Baptist.

8Q. Where were you married?

A. At his house.

9Q. In what City and State?

A. Maryland.

10Q. In what City and State?

A. Baltimore, Maryland.

11Q. Are you living with your wife now?

A. No, sir.

Nathaniel Adams.

12Q. Did you leave her or did she leave you?

A. She left me.

13Q. When?

A. On the 3d of September of 1911.

14Q. Have both you and your wife been residents of Baltimore City, State of Maryland for more than two years prior to the time you started your divorce case on the 2d of June, 1920?

A. Yes.

15Q. Has this separation continued uninterruptedly for a period of more than three years prior to the time you started your divorce case which was on the 2d day of June, 1920?

A. Yes.

16Q. Have you lived with your wife since the time you separated?

A. No, sir.

17Q. Then it has continued uninterruptedly for more than three years prior to the time you started your divorce case?

A. Yes.

Nathaniel Adams.

18Q. Were you always a kind, affectionate and true husband toward your wife in every particular?

A. Yes.

19Q. Was your conduct above reproach in all respects?

A. Yes.

20Q. Did you provide for your wife and do everything that you could to make her happy?

A. Yes.

21Q. Did you give her any cause or reason for deserting and abandoning you?

A. No, sir.

22Q. Was her going her own deliberate and final act?

A. Yes, her going was her own deliberate and final act.

23Q. Is there any hope or expectation of your ever living with him any more?

A. No, sir.

24Q. Are there any children born as the result of this marriage?

Nathaniel Adams.

A. No.

25Q. How did she treat you?

A. Well, I will say that she treated me mean; I was a hard-working man and I came home in the afternoon and looked for my supper and she was out on the street with the other girls and generally got home at two o'clock and I said to her, "Now you better stay home; look what your home looks like," and she said, "If you don't like that I will go."

26Q. She said that?

A. Yes.

27Q. And what happened on the day of the separation?

A. She said a few things and walked out.

28Q. Did she say when she left that she would never be back to live with you any more?

A. Yes.

29Q. Has she ever been back?

A. No, sir.

30Q.. Is there any hope of her ever coming back?

A. No, sir.

Nathaniel Adams.

31Q. You say that on the 3d of September, 1911, you asked her why she did not stay home and she said that she would go?

A. Yes.

32Q. And she took her things and did go?

A. Yes.

33Q. And she has not been back since?

A. No, sir, she has not been back since.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this, your examination, or the matters in question between the parties. If so, state the same fully and at large in your answer.

A. ---

Nathaniel Adams

HENRIETTA HEARN,

a witness of lawful age, produced on behalf of the plaintiff, having been first duly sworn, was examined and testified as follows:

QUESTIONS BY THE EXAMINER:

1Q. State your name, residence and occupation.

A. Henriette Hearn; 610 Gilbert Street; house-keeper.

2Q. Do you know the parties to this suit?

A. Yes.

QUESTIONS BY MR. BOND:

3Q. Do you know about when Mr. Adams was married?

A. Yes, the 5th of September, 1906.

4Q. What date?

A. 1906, on the 5th of September.

5Q. The 5th or the 15th?

A. The 15th of September, 1906.

6Q. Have you ever seen their marriage license?

A. Yes.

Henrietta Hearn.

7Q. Do you remember when Mr. and Mrs. Adams lived together as husband and wife?

A. Yes.

8Q. Did you know the minister that married them?

A. Yes.

9Q. Was he a regularly ordained minister of the gospel?

A. Yes.

10Q. What was his name?

A. The Rev. Mr. Watkins.

11Q. Connected with what faith?

A. Baptist.

12Q. Preaching at what church?

A. The Enos Baptist Church.

13Q. In what City and State?

A. Baltimore, Maryland.

14Q. Are they living together now?

A. No, sir.

15Q. Did he leave her or she leave him?

A. She left him.

Henrietta Hearn.

16Q. When?

A. On the 3d of September, 1911.

17Q. Tell us what took place at that time.

A. He was working very hard and he came home and asked for his supper and she was always out and never home when he came in and he used to fix his own supper and when she came in that time he asked her where she was and as she said that if he did not like it that she would go.

18Q. Did she go?

A. Yes, she went.

19Q. Did she take her clothes and everything with her?

A. Yes.

20Q. Has she ever been back?

A. No.

21Q. You know of your own knowledge that she left on that date, September 3, 1911?

A. Yes.

Henrietta Hearn.

22Q. You lived right there at the house for a while, didn't you?

A. Yes.

23Q. Now have the parties to this suit been residents of Baltimore City, State of Maryland, for more than two years prior to the filing of this suit?

A. Yes.

24Q. And the suit was filed on the second day of June, 1920?

A. Yes.

25Q. Has this separation continued uninterruptedly for more than three years prior to the time this divorce case was started on the 2d of June, 1920?

A. Yes.

26Q. They have not lived or cohabited together since they separated?

A. No, sir.

27Q. Was he always a good, kind, affectionate and true husband toward his wife?

A. Yes.

Henrietta Hearn.

28Q. Was his conduct above reproach in all respects?

A. Yes.

29Q. How did he treat his wife?

A. He was very affectionate and kind to his wife; he worked very hard and gave all of his money to her and never opened his envelope and always gave it right to her that I know of.

30Q. Have you talked with him since?

A. Oh, yes.

31Q. I mean have you talked with her since?

A. Oh, yes, she came to see me.

32Q. Did she ever say anything to you about not coming back?

A. Yes, she said that she would never live together any more with him.

33Q. Was her going her own deliberate and final act?

A. Yes.

34Q. Is there any reasonable expectation or hope of their living together any more?

A. No, sir.

Henrietta Hearn.

35Q. Are there any children as the result of this marriage?

A. No, sir.

36Q. How did she treat him generally?

A. She treated him very cruel, of course.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this, your examination, or the matters in question between the parties. If so, state the same fully and at large in your answer.

A. ---

No
Berretta Steam

No other witnesses being named or produced before me, I then, at the request of the Solicitor..... of the plaintiff..... closed the depositions taken in said cause and now return them closed under my hand and seal, on this 20 day of July in the year of Our Lord nineteen hundred and twenty at the City of Baltimore, in the State of Maryland.

A. de Russy Sappington (SEAL).
Examiner.

There are no Exhibits with these depositions, to wit:
Plaintiff's Exhibit \

Defendant's Exhibit \

A. de Russy Sappington
Examiner.

I, A. de RUSSY SAPPINGTON, the Examiner before whom the foregoing depositions were taken, do hereby certify that I was employed in assigning a day, and taking the said depositions upon two days, on both of which I was employed by the Plaintiff....., and on none by the Defendant.....

A. de Russy Sappington
Examiner.