

B78/1920

IN THE CIRCUIT COURT  
NO. 2  
BALTIMORE CITY.

Samuel H. Giles

VS.

Sarah Giles.

Bill for divorce,  
A VINCULO MATRIMONII.

No 18848B

Mr. Clerk:---

Please file &c.,

*Paul Bond*  
Solicitor for Plaintiff,  
215 St. Paul Place.

Feb 13<sup>th</sup> February 1920

Samuel H. Giles

VS.

Sarah Giles

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IN THE CIRCUIT COURT  
NO. 2  
BALTIMORE CITY.

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 7th day of February 1902, and lived together as man and wife until on or about the 15th day of April 1912.

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, was always 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 is one minor child as the result of said marriage, Elmer Giles, aged sixteen years.

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 her to be and appear in this Court, in person or 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,

*Samuel H. Gies*  
.....  
Plaintiff.

*Paul Bond*  
.....  
Solicitor for Plaintiff.

441 LK  
764 N. Eden st

Ct. Ct. No. 2

78 B  
1920 Docket No. 29

Giles

vs.

3/6/20

Giles

Subpoena to Answer Bill of Complaint

(2)

No. 18848 B  
2

Copy = copied

Filed S. Marger, 1920  
Ray S. Bond  
Solicitor.

SW 4488 3

Summoned and a copy of the process left with the Defendant

Thomas J. Mc Neely  
Sheriff

(Embelsater) 3  
9/6/20 Jan \$0.50

EQUITY SUBPOENA  
The State of Maryland

To

*Sarah Giles*  
*704 1/2 Eden St*

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you be in your person before  
*March* the Circuit Court No. 2 of Baltimore City, at the Court House in said city, on the second Monday of  
....., 1920, to answer the complaint of

*Samuel H Giles*

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 *12<sup>th</sup>* day of *January*, 1920  
Issued the *13<sup>th</sup>* day of *February*, in the year 1920

*John Sheusants*

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.”

In The Circuit Court  
B 78 No 2  
1920 of  
Baltimore City

Samuel Giles

vs

Sarah Giles

Plaintiff Respondent

Mr. Clerk please file

(John) Davis  
atty

No 18848B  
(3)

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BALTIMORE, MD.

Filed 20 March 1920

Samuel H. Giles

In The Circuit Court no. 2

vs.

of

Sarah Giles

Baltimore City.

-----  
To The Honorable, The Judge of said Court:

The answer of the respondent to the bill for divorce in this court exhibited is as follows:-

FIRST, Your respondent admits the allegations as contained in the first, second, paragraphs of the plaintiff bill.

SECOND, Your respondent with great respect denies the allegation as contained in the third paragraph and insists on the strictest legal proof thereon.

THIRD, Your respondent denies that the minor child borne as a result of this marriage is sixteen years of age but avers that he is fifteen years old.

FOURTH, The plaintiff is employed by himself in the moving and transfer business and earns from fifty dollars to sixty dollars a week; that your respondent is poor and very much in need of financial assistance. That she is advised by counsel that she is entitled to have an order passed by this Honorable Court, awarding her a certain sum as alimony during the progress of this suit and permanent alimony for the support of the aforesaid minor child, and a further sum to compensate her solicitor for his services in the cause.

WHEREFORE YOUR RESPONDENT PRAYS:

a-That an order be passed allowing her alimony Pendente Lite, Counsel fee in such sums as this Honorable Court may think just and proper.

b-Such other and further relief as the case may be bound.

State of Maryland )  
                                  ) To Wit  
Baltimore City.

*(C. Row) Davis*  
*att. for defendant*

I hereby certify that on this 18 day of March 1920, before the subscriber, a notary Public, of the State of Maryland, in and for the ~~City~~<sup>county</sup> of Baltimore, personally appeared Sarah H. Giles, the petitioner, in the foregoing proceedings, and is true to the best of her knowledge and belief.

As witness my hand and Seal.

  
Notary Public.



Serve on  
Samuel H Giles  
1128 Comet St

B Docket <sup>78</sup>/<sub>1920</sub>

**CIRCUIT COURT No. 2**

Samuel Giles  
vs.  
Saul Giles

**Order Counsel Fee and Alimony.**

Pendente Lite  
Husband Plaintiff <sup>3/24/20</sup>

ORDER <sup>20 March 1920</sup>

No. 18848 B.

(4)

Copy - looped

Filed <sup>20 March</sup> 1920

Copy of the within Order of Court served on  
Samuel Giles on the 24<sup>th</sup> day of March, 1920,  
in presence of Morris Finkelshtein.  
Thomas J. M<sup>c</sup>Inty  
Sheriff.  
Fee \$0.50.

Samuel Giles

vs.

Senah Giles

IN THE  
CIRCUIT COURT No 2

OF

BALTIMORE CITY

March

TERM, 1920

ORDERED BY THE COURT, this 20th day of March 1920

that the Plaintiff Samuel Giles  
pay to the Defendant Senah Giles  
the sum of ~~one~~ thirty five Dollars as Counsel Fee for the  
Solicitor of the Defendant, and that he further pay the sum of twenty  
Dollars per week, during the continuance of this suit, to the said Defendant

as Alimony, **pendente lite**, unless cause to the contrary be shown on or before the  
day of April 1920, provided a copy of this Order be served on the said Plaintiff  
Samuel Giles on or before the 26th

day of March 1920  
\$55 per week  
1 check

Walter S. Darius

TRUE COPY—TEST:

Clerk.

B78  
1920

IN THE CIRCUIT COURT  
NO. 2  
BALTIMORE CITY.

Samuel H. Giles

VS.

Sarah Giles.

- Answer to Petition  
for  
ALIMONY AND COUNSEL FEE.

No 18848 B  
A

Mr. Clerk:---

Please file &c.,

*R.M. Bond*  
.....  
Solicitor for Plaintiff  
215 St. Paul Place.

18<sup>th</sup> April 1920

Samuel H. Giles

VS.

Sarah Giles.

IN THE CIRCUIT COURT  
NO. 2  
BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of Samuel H. Giles plaintiff, to the petition of Sarah Giles, defendant in the matter of Alimony and Counsel fee respectfully shows unto your Honor:-

FIRST: The plaintiff reiterates the truthfulness of each and every charge as laid down in his Bill of Complaint, and respectfully submits that he is entitled to the relief as prayed therein.

SECOND: That your Respondent is a poor man and that he has no property worthy of mention, that he simply operates a small one horse express wagon whenever and wherever he can find work to do and he emphatically denies that he receives a regular wage as mentioned in the defendant's petition. That his wife has adequate means of her own and that he <sup>is</sup> already under order, issuing from one of the Station House Magistrates to pay his wife Two Dollars and fifty cents (\$2.50), a week for the support of their sixteen year old boy, who is now able to bring in, and who does bring in a reasonable amount of money for his own support.

THIRD: That he is unable to pay the alimony and Counsel fee, as has been set out regardless as to however eager he may be to comply with the order of this Honorable Court.

FOURTH: Having answered all the material allegations of the Defendant's petition, he respectfully prays that the same be dismissed and the Order thereon vacated.

As in duty bound, he will ever pray,

*Samuel H. Giles*  
.....  
Plaintiff.

*Paul Bond*  
.....  
Solicitor for Plaintiff.

State of Maryland \*  
Baltimore City \* to wit\*  
\*

I hereby certify that on this <sup>2<sup>nd</sup></sup> day  
of March 1920, before me the subscriber, a Notary Pub-  
lic of the State of Maryland, in and for Baltimore City,  
personally appeared Samuel H. Giles, the plaintiff, in  
the foregoing proceedings, and made oath in due form of  
law, that the matter contained in this, his answer, is  
true to the best of his knowledge and belief.

As witness my hand and Notarial Seal.

*Charles C. Jennings*.....  
Notary Public.

✓ #45  
**Circuit Court No 2.**

78  
191

Docket 219

*Samuel H. Giles*  
vs.

*Sarah Giles*

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

*order 12<sup>th</sup> April 1920*

*Page* No. *18848 B*  
6

Filed *12 April*, 191*20*

Samuel H. Giles

vs.

Sarah Giles

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 Samuel H. Giles, the 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.

Roy B. Bond  
Solicitor for Plaintiff

ORDERED, this 12<sup>th</sup> day of April, 1920, 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 J. Dawkins

48 B Cir. Ct. No. 2.  
1924 Docket No. 29

Samuel H. Giles

vs.

Sarah Giles

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file.

Raymond  
Solicitor for Plaintiff.

No. 18848 B

Filed 3 May 1924



Samuel H. Giles

Sarah vs Giles

In the Circuit Court No. 2  
Of Baltimore City.

March

TERM 1911/1920

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.

*Royce Bond*  
Solicitor for Plaintiff,

*(P. H. Jam)*

Solicitor for Defendant.

*12-1-1911*

Ct. Ct. No. 2

78  
1920 Docket No. 29

*G. Siler*

vs.

*Giles*

**Order of Reference**  
*How May 1920*  
**and Report**

*Robertson*

No. 18848 B  
9-19 ✓

Order Filed 4 day of May 1920  
Report Filed 8 day of May 1920

IN THE  
Circuit Court No. 2  
OF  
BALTIMORE CITY

Term, 192

*Samuel H. Giles*

vs.

*Barah Giles*

This case being submitted, without argument, it is ordered by the Court, this *4<sup>th</sup>*  
day of *May*, 192*0*, that the same be and it is hereby referred to  
*Alexander H. Robertson*, Esq., Auditor and Master, to report the  
pleadings and the facts, and his opinion thereon.

*Walter J. Davies*

**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 summoned and answers. Proof shows marriage,  
residence and abandonment for, at least, three years continuous,  
deliberate, final and without hope of reconciliation. The minor  
child to remain in the custody of the defendant and the plaintiff  
to pay three dollars(\$3.), per week, for his support. Case submitted  
and ready for decree.

*Alex H. Robertson*  
*Auditor & Master*

Circuit Court No. 2

B

B 78  
1920 No. Docket

Samuel H. Giles

vs

Sarah Giles.

DECREE OF DIVORCE.

*13<sup>th</sup> May 1920*

*Pd  
f*

*R*

No. *18848 BV*

*Copy = copied*

Filed

*W. M. Roddy*

, 19*20*

IN THE

Samuel H. Giles

Circuit Court No. 2

vs.

OF

BALTIMORE CITY.

Sarah Giles.

May Term, 1920.

This is a proper decree.

Alexander R. ... Auditor and Master.

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

It is thereupon, this 13<sup>th</sup> day of May Anno Domini, one thousand nine hundred and twenty by the CIRCUIT COURT No. 2 OF BALTIMORE CITY, Adjudged, Ordered and Decreed, that the said Samuel H. Giles

the above named complainant be, and he is hereby DIVORCED A VINCULO MATRIMONII, from the defendant. Sarah Giles, and that the minor child, Elmer Giles, remain in the custody of the defendant, and that the plaintiff pay the defendant three dollars (\$3.), per week, for the care of the said minor child. (as per agreement filed.)

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

Walter T. Dawkins.

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 ... 191...

Clerk Circuit Court No. 2 of Baltimore City.

Doc. B 78  
1920

3/18/13/68

In the Circuit Court, No. 2  
OF BALTIMORE CITY

DEPOSITIONS

Samuel H. Giles

vs.

Sarah Giles

No. 18848 B  
7

PLAINTIFF'S COSTS

Examiners ..... \$ 8<sup>00</sup>  
Copies .....  
Sheriff .....  
Stenographer ..... 1<sup>00</sup>  
\$ \_\_\_\_\_

DEFENDANT'S COSTS

Examiners ..... \$ .....  
Copies .....  
Sheriff .....  
Stenographer .....  
\$ \_\_\_\_\_

Ad. 26<sup>th</sup> April 1920

13<sup>th</sup> May 1920

Samuel H. Giles

Sarah Giles

vs.

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

twelfth day of April 1920, met on

the twelfth day of April in the year nineteen

hundred and twenty at my office, in the City of Baltimore, in the State

of Maryland, and assigned the thirteenth day of April

in the same year at five o'clock in the afternoon and the

office of Roy St. Gond, Esq. in the City and State

abovesaid, 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

GILES

VS

GILES

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Testimony taken at the office of Roy S. Bond, Esq.,  
215 St. Paul Place, Baltimore, Maryland, on Tuesday,  
April 13th, 1920, at five o'clock, P. M.

-----

SAMUEL H. GILES, the plaintiff in this case, produced on his own behalf, having been first duly sworn, deposeseth and saith as follows, that is to say:

BY THE EXAMINER:

1 Q. State your name, residence and occupation?

A. Samuel H. Giles, 1128 Comet Street; I drive a wagon.

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

A. Yes, I am the plaintiff, and my wife is the defendant.

BY MR BOND:

1 Q. Mr. Giles, when, where and by whom were you married?



## Samuel H. Giles

- A. I was married by the Reverend Mr. Norris.
- 2 Q. What was his first name?
- A. John W. Norris.
- 3 Q. Was the Reverend Mr. Norris a regularly ordained minister of the Gospel?
- A. Yes, he was.
- 4 Q. Connected with what Faith?
- A. The A. M. E. Church.
- 5 Q. Now, where were you married?
- A. In Baltimore.
- 6 Q. Of what State?
- A. Maryland, at the parsonage.
- 7 Q. At the parsonage of the pastor?
- A. Yes sir.
- 8 Q. Now, do you remember when it was that you were married?
- A. 7th of February, 1902.
- 9 Q. Are you living with your wife now?
- A. No sir.
- 10 Q. Now, tell us when you were separated?
- A. 15th of April, 1912.
- 11 Q. Now, did she leave you, or did you leave her?

Samuel H. Giles

A. She left me.

12 Q. How long have you been a resident of Baltimore City, State of Maryland?

A. Two years; for more than two years.

13 Q. Have you been a resident of Baltimore City for more than two years prior to the time this divorce case was started by you?

A. Yes.

14 Q. How did you always treat your wife?

A. Like a husband should treat a wife, the best that I could.

15 Q. What did you do for her?

A. Everything that laid in my power.

16 Q. Were you always a good, kind, affectionate and true husband towards your wife?

A. I tried to be so to the best of my knowledge.

17 Q. Don't tell us what you tried to do?

A. I did. If a person does all that he can do he cannot do any more.

18 Q. After your wife left you, did you ever ask her to come back?

A. I sent someone to talk to her and see if he

Samuel H. Giles

could not reason with her and get her to come back and do better.

19 Q. You sent someone to talk to her to get her to come back and do better?

A. Yes.

20 Q. Now, is the person that you sent one of your witnesses here to-day?

A. Yes.

21 Q. Now, has this separation continued uninterruptedly for a period of more than three years prior to the filing of this suit?

A. Yes.

22 Q. You have not lived or cohabited with your wife since the date of the separation?

A. No sir.

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

A. No sir.

24 Q. Now, was her going away her deliberate and final act?

WITNESS: What?

Samuel H. Giles

COUNSEL: Was her going away her own deliberate and final act?

A. Yes.

25 Q. You did not drive her away did you?

A. No sir, I did not drive her away.

26 Q. Did you ever give her any reason or cause for leaving you?

A. No sir.

27 Q. How did she treat you?

A. Well, she just treated me as a slave; nothing suited her.

28 Q. Nothing suited her?

A. No sir, nothing that I could do pleased her.

29 Q. Tell us what happened about the time of the separation?

A. About the time of the separation when I came in I would get black looks; I could not get a decent meal, and she had the children so that they were afraid to speak to me and treat me as a father.

30 Q. Have you any minor child or children?

A. Well, the only one is a boy sixteen years old.

31 Q. And does he wear long pants or short pants?

## Samuel H. Giles

A. Long pants, and he is as big as you are.

32 Q. He is in school at the present time, isn't he?

A. Yes.

32 Q. You have been contributing towards his support for sometime, have you not?

A. Yes.

33 Q. And you are willing to continue that support until he is of age, or old enough to look out for himself?

A. Yes.

34 Q. You have in the past given about how much per week?

A. Well, four dollars I gave at last, and since the case has been in progress, I was giving four dollars, but before that I gave her two dollars and fifty cents for the last eight years.

35 Q. What you mean to say is that prior to the time you brought this suit you gave her two dollars and fifty cents, but since the suit has been instituted, you have been giving her four dollars a week?

A. Yes.

37 Q. And you are willing to continue to support the child, and contribute towards the support of the child,

## Samuel H. Giles

Three Dollars a week.

38 Q. Until he is able to look out for himself?

A. Yes.

39 Q. Does he do any work?

A. Well, after school hours he works in a shoe shop shining shoes.

40 Q. How does he make?

A. Six and eight Dollars a week, I suppose; maybe more.

41 Q. How much is he able to make in the Summer time?

A. Ten or fifteen dollars a week.

42 Q. A week?

A. Yes.

43 Q. Tell us as best you can how she treated you when she left you?

A. Well, she was fussing and quarrelling continually, and I could not get a pleasant word out of her, and she took her thing and went right away from me.

44 Q. And then you attempted to get her back, didn't you?

A. Yes.

45 Q. And did she declare her intention never to live with you any more?

Samuel H. Giles

A. Yes, that was her intention.

46 Q. Did she declare her intention never to live with you any more?

A. Yes.

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*  
*Samuel H. Giles*



WILLIAM WHITTINGTON, a witness of lawful age, produced on behalf of the plaintiff, having been first duly sworn, deposeth and saith as follows, that is to say:

BY THE EXAMINER:

1 Q. State your name, residence and occupation?

A. William Whittington, 528 Eden Street; Paster.

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

A. Yes, I am personally acquainted with both of them.

BY MR. BOND:"

1 Q. Mr. Giles has alleged that he was married on the 7th of February, 1902, is that correct?

A. Yes.

2 Q. He has alleged that he was married by a religious ceremony, and by a regularly ordained minister of the Gospel in Baltimore City, State of Maryland?

A. Yes.

3 Q. Do you remember when Mr. and Mrs. Giles lived together as husband and wife?

A. Yes, I do.

4 Q. Did you have occasion from time to time to visit the home of Mr. and Mrs. Giles?

A. Well, on some occasions I did.

5 Q. How did Mr. Giles treat his wife?

## William Whittington

A. As far as I could see he was a man that maintained his home.

6 Q. Did he provide for the support of his wife and family?

A. From all observations that I could take of his home, he did.

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

A. In my presence, and as far as I know of him on the outside, he was.

8 Q. You never saw anything out of the way in him?

A. No sir, never in my life.

9 Q. Are they living together now?

A. No sir.

10 Q. Did she leave him, or did he leave her?

A. She left him.

11 Q. About when, if you can remember?

A. I cannot just remember that.

12 Q. Was it around the 15th of April, 1912?

A. I think it was somewhere along there.

13 Q. Will you tell us please how many years it has been since they were separated, - at least how long?

## William Whittington

A. About seven or eight years.

14 Q. And were they separated in the Spring of the year?

A. Yes, in the Spring of the year.

15 Q. Now, think if you please, Mr. Whittington, and tell us when that was if you can remember; take your time and think?

A. It was about that time.

16 Q. Mr. Giles says it was the 15th of April, 1912, is that right?

A. If my memory serves me right, that is about the time it was.

17 Q. How long have you known Mr. Giles?

A. All of my life.

18 Q. And that is how long?

A. At least forty or forty-five years.

19 Q. Has Mr. Giles been a resident of Baltimore City, State of Maryland, for more than two years prior to the filing of this suit?

A. Yes.

20 Q. Now, has this separation continued uninterruptedly for a period of more than three years prior to the time

## William Whittington

this divorce case was started?

A. Yes.

21 Q. Was Mr. Giles always a good, kind, affectionate and true husband towards his wife?

A. As far as I can see, yes.

22 Q. Now, have you ever seen Mrs. Giles since this separation?

A. No sir, I have not seen her, prior to the occasion that I saw her when I went to her house.

23 Q. That is the occasion I am talking about; have you seen her since the separation; wasn't that after the separation?

A. Yes, that was after the separation.

24 Q. Tell us what you said and what she said?

A. Mr. Giles sent me to see whether she was in destitute circumstances, and see if she would come back to him, and I went, and she let me in and after I told her my errand she told me she never wanted to have anything to do with him as long as she lived, and she said "I am going to take and send him to jail", and I said to her "Well, Mrs. Giles, you are trying to do what is right, and he is also trying to do what is right

## William Whittington

and two wrongs never make a right", and I said "One of you have got to be right", and she said "I won't have anything to do with him; I don't want him and I am going to send him to jail", and she talked so fastastic that I excused myself and walked out.

25 Q. Add that jail business to which she referred was for the support of the sixteen year old boy?

A. The way that she said, yes. She said that she was going to send him to jail. She sent him to jail all right, and I think you can trace the history of it up on the records.

26 Q. Well, now, the only trouble that Mr. Giles has ever been in was about the support of this child; the jail business was in regard to the support of the child?

A. Yes, the jail business was in regard to the support of the child.

27 Q. How old is the child?

A. The child is sixteen years of age, and he is just as big a man as you are in proportion.

28 Q. Mr. Giles has always looked out for this boy?

A. He always did prior to the separation as far as

## William Whittington

I could see. He was a man that loved his family, and looked presentable at his work; I worked with him daily and I saw him always taking something to eat home to them.

29 Q. Now, did she declare her intention never to live with him any more ?

A. She told me that she never wanted to have any thing more to do with him, and that she was going to send him to jail.

30 Q. And what was her expression to you; that is not what she said to you?

A. She said that she was going to send " his ass to jail, that is what she said.

31 Q. Is this separation deliberate and final?

A. Yes.

32 Q. There is no hope of their living together any more?

A. No sir, not according to what she said and what he has said.

33 Q. There is no hope of a reconciliation at any time?

A. No sir, she does not want him.

34 Q. Has this abandonment continued uninterruptedly

William Whittington

since April, 1912?

A. Yes.

35 Q. And it was deliberate and final, and is beyond all reasonable expectation of a reconciliation?

A. yes.

36 Q. Has the plaintiff, Mr. Giles, been a resident of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit?

A. Yes.

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*

*Don* *his* *x* *Washington*  
*mark*

*Test*  
*Robert L. Lantieri*