

In the Circuit Court,
No. 2,
Baltimore City.

VIRGIE BERRYMAN

VS.

WILSON BERRYMAN

2436 Buchanan St

Bill for divorce,

A VINCULO MATRIMONII.

No 23192B
(11)

Mr. Clerk:--

Please file &c.,

Roy S. Bond
Sol. for Plaintiff.

ROY S. BOND
ATTORNEY AT LAW
215 ST. PAUL PLACE
BALTIMORE, MD

FILED

7 September 1928

VIRGIE BERRYMAN

VS.

WILSON BERRYMAN

In the Circuit Court,

No. 2,

Baltimore City.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix, Virgie Berryman complaining, respectfully says:

(1) That she was married to her husband, Wilson Berryman, in Baltimore City, State of Maryland, on or about the 20th day of September, 1916, with whom she resided until on or about the 2nd day of April, 1917.

(2) 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.

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

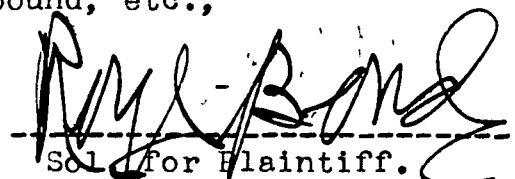
(4) That there are no children as issue of said marriage.

WHEREFORE YOUR ORATRIX PRAYS:

- a- A divorce, A Vinculo Matrimonii, from the defendant, Wilson Berryman,
- b- That she may resume her maiden name, Virgie Foote,
- c- Such other and further relief as the case may require.

May it please your Honor, to grant unto your
Oratrix, Virgie Berryman, the writ of subpoena, directed
unto the said defendant, Wilson Berryman, residing-2436
Buchanan Street, 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, etc.,


SOL. for Plaintiff.

Pg 23 107-123

Ct. Ct. No. 2

430

192 3 B Docket No 32

Benjamin

vs.

Benjamin

2436 Wisconsin Ave.

Subpoena to Answer Bill of Complaint

Pro

No. 23192 B
(27 3-4)

Copy = copied 2
14 January 1924
We dated 1923

Filed 10 Reynolds, 1923
Ray L Bond
Solicitor.

19

Mon Est
17 days

Thomas F W muller
sheriff

19 September 1923

REISSUED TO Delaney Return Day, 1923

John Pleasants
CLERK.

Mon Est
Reley

Thomas. R McNulty
Sheriff

January 1924

REISSUED TO January Return Day, 1924

John Pleasants

Summed a copy of the process up to with the
defendant

(Reley) 1/11/24

John E. Potee
Sheriff

Fees - 0.80

EQUITY SUBPOENA
The State of Maryland

To

Wilson Berryman
2436 Buchanan St

of Baltimore City Greeting:

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you do within the time limited by law, beginning on the second Monday of *September*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Margie Berryman

against you exhibited in the CIRCUIT COURT No. 2 OF BALTIMORE CITY.

HEREOF fail not, as you will answer the contrary at your peril:

WITNESS, the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the *9* day of *July*, 192 *3*

Issued the *7* day of *September*, in the year 192 *3*

John Pleasant
Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

IN THE CIRCUIT COURT NO.2

OF

BALTIMORE CITY: *B430*
1923

VIRGIE BERRYMAN

VS.

WILSON BERRYMAN

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

No 23101
51
J. Steward Davis
ATTORNEY FOR RESPONDENT.

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE
BALTIMORE, MD.

By 15 January 1924

VIRGIE BERRYMAN

:

IN THE CIRCUIT COURT NO. 2

VS

:

OF

WILSON BERRYMAN

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the bill of complaint in the above case exhibited is as follows:

1. Your respondent admits the allegations contained in the first paragraph of the bill of complaint.
2. Your respondent admits the allegations contained in the second paragraph of the bill of complaint.
3. Your respondent denies with great emphasis the allegations contained in the third paragraph of the bill of complaint.
4. Your respondent admits the allegations contained in the fourth paragraph of the bill of complaint.

WHEREFORE your respondent prays that the bill be dismissed with cost to the complainant.

J. Steward Davis

ATTORNEY FOR RESPONDENT.

Circuit Court No. 2

430

1923.

Docket 32B.

VIRGIE BERRYMAN

vs.

WILSON BERRYMAN.

Ray
Petition for leave to take
Testimony and Order of
Court thereon.

No. 23192B
6

Filed

9 February 1923

VIRGIE BERRYMAN

vs.

WILSON BERRYMAN

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 Virgie Berryman, Plaintiff,

in this case, respectfully shows that she desires to take testimony in this case, and respectfully pray s that leave be granted her to do so before one of the Standing Examiners of this Court.

Wm. Bond
Solicitor for Plaintiff.

ORDERED, this 9th day of February 1924, 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. Darkins

Virgie Berryman

vs.

Hilson Berryman

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

ninth day of February 1924, met on the seventh day of June in the year nineteen hundred and twenty-four at my office, in the City of Baltimore, in the State of Maryland, and assigned the

ninth day of June

in the same year at one-thirty o'clock in the afternoon and the office of Roy'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:—

No other witnesses being named or produced before me, I then, at the request of the Solicitor.....of the.....
closed the depositions taken in said cause and now return them closed under my hand and seal, on this.....*24th*.....day of *June*
in the year of Our Lord nineteen hundred and *twenty-three*.....at the City of Baltimore, in the State of Maryland

A. de Russey Sappington (SEAL).
Examiner.

There are *no*.....Exhibits with these depositions, to wit:
Plaintiff's..... Exhibit *1*

Defendant's..... Exhibit *1*

A. de Russey 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 Russey Sappington
Examiner.

Doc. 130
1923

In the Circuit Court, *No. 2*
OF BALTIMORE CITY

DEPOSITIONS

Virgie Berryman

vs.

Wilson Berryman

No. 23192B

PLAINTIFF'S COSTS

Examiners..... \$ 8.00

Copies.....

Sheriff.....

Stenographer.....

\$ _____

DEFENDANT'S COSTS

Examiners..... \$ _____

Copies.....

Sheriff.....

Stenographer.....

\$ _____

Ad 24 June 1924
8 July 1924

VIRGIE BERRYMAN

vs.

WILSON BERRYMAN.

Testimony taken at the offices of Roy S. Bond,
220 St. Paul Place, on Monday, June 9th, 1924, at 1:30 o'clock
in the afternoon.

Thereupon---

VIRGIE BERRYMAN,

the plaintiff, of lawful age, produced in her own behalf,
having been first duly sworn according to law, was examined and
testified as follows:

1Q (By the Examiner): Please state your name, age,
residence and occupation?

A. Virgie Berryman, age 30, 2456 Buchannon Street,
laundress.

2Q Do you know the parties to this suit, or either of
them?

A. I know them both, I am the plaintiff and my husband
is the defendant.

3Q (By Mr. Bond): When, where and by whom were you
married?

A. September 20, 1916 in Baltimore, at 2456 Buchannon

Street, by the Reverend R. A. Green.

4Q Are you living the same place now as you were when you were married?

A. Yes.

5Q Did your husband leave you or did you leave him?

A. He left me on April 2, 1917.

6Q Is the Rev. Green, whom you say married you, a regular ordained Minister of the Gospel?

A. Yes.

7Q State the circumstances under which your husband left you on the 2nd of April 1917?

A. On the 1st day of April he went out and stayed all night, and came home in the morning, and when I asked him where he had been he told me it was none of my business and slapped me in the face, and packed his suit case and went. He said he was tired of married life.

8Q Did you give him any cause or reason for leaving you?

A. No, I did not.

9Q Have you and your husband been residents of Baltimore City, State of Maryland for more than

two years prior to the time this case was started?

A. Yes.

10Q Have you been separated uninterruptedly for a period of more than three years?

A. Yes.

11Q Were you always a kind and true wife?

A. Yes.

12Q Was his going away his own deliberate and final act?

A. It was.

13Q Are there any hopes of a reconciliation?

A. No.

14Q Did you give him any cause at all for deserting you?

A. I did not.

15Q Have you any children?

A. No.

16Q You ask to resume your maiden name, what is your maiden name?

A. Virgie Foote

17Q Have you lived with or cohabited with your husband since the date of the separation?

A. No.

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
Irving Berenson

18Q And your separation has continued
uninterruptedly for more than three years?

A. Yes sir.

Thereupon---

THOMAS B. FOOTE,

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

1Q (By the Examiner): Please state your name, residence, age, and occupation:

A. Thomas B. Foote, 2402 Buchannon St, Baltimore, Express man, age 44.

2Q Do you know the parties to this suit or either of them?

A. Yes, I do.

3Q (By Mr. Bond): Do you remember when these folks lived and cohabited together as man and wife?

A. Yes .

4Q Were you at their wedding?

A. Yes.

5Q Then you know that they were married?

A. Yes, I do.

6Q Are they living together now?

A. No.

7Q Which left the other?

A. He left her.

8Q When did he leave her, if you please?

A. On the 2nd of April, 1917.

9Q Did she give him any cause or reason for going away?

A. No.

10Q She testifies she asked him where he had been, after he had been out all night, and he slapped her and packed up his suit case and went out?

A. Yes, that is right.

11Q She is now living at 2402 Buchannon St.

A. Yes.

12Q Have both parties been residents of the City of Baltimore for more than two years prior to the time this case was started?

A. Yes.

13Q Has the separation continued uninterruptedly for a period of more than three years prior to the time this case was started?

A. Yes.

14Q Was she always a good, kind, true wife to her husband?

A. Yes.

15Q Was his action his own deliberate and final act?

A. Yes..

16Q Do you think there is any hope of a reconciliation?

A. No.

17Q Any children?

A. No, they have no children?

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*

Thomas B. Root

Thereupon---

RENA FOOTE,

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

1Q (By the Examiner): What is your name, age, residence, and occupation?

A. Rena Foote, 2402 Buchannon St, laundress, age 30.

2Q Do you know the parties to this suit, or either of them?

A. Yes, both of them.

3Q (By Mr. Bond): Do you remember when they lived together as husband and wife?

A. Yes.

4Q Were you at their wedding?

A. Yes. I was there.

5Q Are they living together now?

A. No.

6Q Did she leave him or did he leave her?

A. He left her.

7Q When?

A. April 2, 1917.

8Q What happened on that day?

A. He came home, and she asked him where he had been and why he stayed out all night. He smacked her in the face and packed his suitcase and left?

9Q Has he ever been back?

A. No.

10Q Is she living there now?

A. At the same house, yes.

11Q Have they been separated for more than three years continuously?

A. Yes, more than three years.

12Q Have they lived together in the meantime?

A. No.

13Q Are both parties residents of Baltimore, and have they been for more than two years?

A. Yes.

14Q Was his going away his own deliberate and final act?

A. Yes.

15Q Has he shown that he does not intend to live with her any more?

Yes.

16Q- Any hopes of a reconciliation now?

A. No.

17Q Have the parties to this suit any children?

A. No.

18Q Did he leave her without cause or reason?

A. He did.

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

^{has}
Alma X. Fote
Mark.

Witness

Albion J.

Cir. Ct. No. 2.

430

192 3.

Docket No. 32B

VIRGIE BERRYMAN

vs.

WILSON BERRYMAN.

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file,

W. Roy Bond
Solicitor for Plaintiff.

No. *23192 B*

Filed *25 June* 192*4*

-VIRGIE BERRYMAN-

VS.
WILSON BERRYMAN.

In the Circuit Court No. 2 Of Baltimore City.

May -----

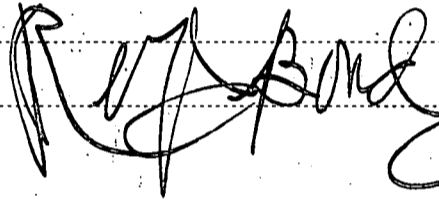
TERM 192 4.

To the Honorable

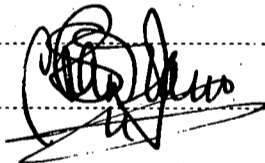
The

Judge of the Said Court:

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



Solicitor for Plaintiff,



Solicitor for Defendant.

Ct. Ct. No. 2

430

192 3.

Docket No. 32B.

VIRGIE BERRYMAN

vs.

WILSON BERRYMAN.

Order of Reference
and Report

Sp
No. 23192 B
9-10

Order Filed 16 day of June 1924

Report Filed 31 day of July 1924

3/19/127

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

VIRGIE BERRYMAN

VS.

WILSON BERRYMAN

May ----- Term, 192 4.

This case being submitted, without argument, it is ordered by the Court, this 26
day of *June*, 192 4, that the same be and is hereby referred to
Alexander H. Robertson, Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.

Charles F. Sku

Report of Auditor and Master

Bill filed by wife against husband for divorce a vinculo matrimonii on the ground
of abandonment for three years, Code Article 16, Section 36. Defendant summoned and
answered. Proof shows marriage, residence and abandonment of the Plaintiff for at least
three years continuous, deliberate, final and without hope of reconciliation. Case
submitted and ready for decree.

Alex H Robertson
Auditor and Master.

The within is a proper decree to be
passed in this case.

Alex. Robertson
Auditor and Master.

Circuit Court No. 2

B ⁴³⁰ 1923 No. 32 Docket

BERRYMAN,

VS.

BERRYMAN,

DECREE OF DIVORCE

ok *R*
No. 23192 B
" "

Copied Copied

Filed *31 August*, 192*4*

DECREE OF DIVORCE.

IN THE

Circuit Court No. 2,

OF

BALTIMORE CITY

JULY Term, 1924.

VIRGIE BERRYMAN

VS.

WILSON BERRYMAN

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

It is thereupon, this 17 day of August, Anno Domini, one thousand nine hundred and twenty-four by the CIRCUIT COURT No. 2 OF BALTIMORE CITY, *Adjudged, Ordered and Decreed*, that the said

VIRGIE BERRYMAN,

the above named complainant be, and she is hereby DIVORCED A VINCULO MATRIMONII, from the defendant, WILSON BERRYMAN.

And the Plaintiff is hereby permitted to resume her maiden name, Virgie Foote.

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

John Pleasants
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 1924