

IN
THE CIRCUIT COURT
OF
BALTIMORE CITY.

142
B 1926

ROBERT C. WASHINGTON

VS.



ROSETTA WASHINGTON

D I V O R C E

A Vinculo Matrimonii

Mr. Clerk:

Please file.

B 30538
11

JOSIAH F. HENRY, JR.
ATTORNEY AT LAW
215-217 ST. PAUL PLACE
BALTIMORE, MD.

FILED 30 March 1926

ROBERT C. WASHINGTON

VS.

ROSETTA WASHINGTON

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IN
THE CIRCUIT COURT
OF
BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator, Complaining Respectfully Says:

1. That he was married to his wife, Rosetta Washington, on or about the 28th day of January, 1922, by a regularly ordained minister of the gospel, with whom he resided until on or about the day of May, 1925, when she deserted and abandoned him, and has declared her intention to live with him no longer and such abandonment is deliberate and final and the separation of the parties beyond any reasonable expectation of reconciliation.

2. That ever since said marriage your Orator has behaved himself as a faithful, chaste and affectionate husband towards his wife, Rosetta Washington.

3. That the said Rosetta Washington has on divers days and times since said marriage committed the crime of adultery with divers lewd and abandoned men whose names to your Orator are now unknown, and said offense has not been condoned by your Orator.

4. That no children were born to them from said union.

5. That your Orator has not lived or cohabited with the said Defendant since he discovered said adulteries.

6. That both your Orator and the Defendant are citizens of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this Bill of

Complaint.

TO THE END, THEREFORE:

(a) That your Orator may be divorced A Vinculo Matrimonii from the said Rosetta Washington.

(b) That your Orator may have such other and further relief as his case may require.

MAY IT PLEASE YOUR HONOR, to grant unto your Orator the Writ of Supoena directed against the said Rosetta Washington commanding and requiring her to be and appear in this Court on some certain day to be named therein to answer the premises and abide by and perform such decree or order as may be passed therein.

AND AS IN DUTY BOUND, etc.

Robert Washington

Joseph H. Berry, Jr.
SOLICITOR FOR COMPLAINANT.

STATE OF MARYLAND, BALTIMORE, To wit:

I HEREBY CERTIFY, that on this 21st day of March 1926, before me, the subscriber, a NOTARY PUBLIC, of the State of Maryland in and for said City, personally appeared the above named Robert C. Washington and made oath in due form of law that the matters and facts in the foregoing Petition are true to the best of his knowledge and belief.

Francis Berry
NOTARY PUBLIC.

P480

Ct. Ct.

B-142

192 6

Docket No.

ROBERT C. WASHINGTON

vs.

ROSETTA WASHINGTON

(2217/100)

943 Madison Ave

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pro

No.

B-. 30538

(2)

Filed

9 April, 1926

Josiah F. Henry, Jr SOLICITOR

100 215 St Paul

Summoned and a copy of the Process left with

the Defendant

(Bundy
4/18/26)

John. B. Potee
Sheriff

Tues 40.80

HEREDON, and not as yet will answer the contrary at your peril.

WITNESSES, the Honorable JAMES S. CONLISK, Chief Judge of the Supreme Bench of Baltimore

against you exhibited in the Circuit Court of Baltimore City,

Given the _____ day of _____ 1926

Clerk

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 302,

(General Editor, Justice 11)

The State of Maryland
EQUITY SUBPOENA

EQUITY SUBPOENA

The State of Maryland

To ROSETTA WASHINGTON

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 APRIL next cause an appearance to be entered for you and your answer to be filed to the complaint of

ROBERT C. WASHINGTON

against you exhibited in the Circuit Court 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 8th day of March, 1926. Issued the 30th day of March, in the year 1926.

Chas. R. Whiteford Clerk

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

Circuit Court

142

1926

Docket... 66B

Robert C. Washington
vs.

Rosetta Washington

Trick

Petition for leave to take
Testimony and Order of
Court thereon

No. 30-538

B 30538

(4)

Filed 11th May 1926

Robert C. Washington

vs.

Rosetta Washington

IN THE

Circuit Court

OF

BALTIMORE CITY

To the Honorable the Judge of the
Circuit Court of Baltimore City:

THE PETITION OF

Robert C. Washington

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

Joseph H. Henry, Jr.
Solicitor for complainant

ORDERED, this

11th

day of

May

1926, 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.

James P. Gorter

8/24/28 Banos Translation

Banos. Translation

Exhibit No 2

Perry Point, Md. May 10, 1920. "my dear one: I have received all your letters. I am better and better I will be at liberty very soon. I love you very much, but it is not possible to prove it to you because I am always kept prisoner. SSS. Senorita B.K."

Exhibit No 4.

U.S. ~~Hospital~~ Veterans Hospital, Perry Point, Md. May 1st 1928. Dear Madam and friend: I don't know yet what's the matter with me. The doctors have not examined me, I am going to ~~see~~ you when I know more of my condition. I hope you are in good health. All is well with me. The hospital is not very large, seems like a jail. Today I am confined for examination. In a few days I am going to another part of the hospital. Then I will be at liberty. I have your letters which you wrote. It is impossible for me to send you replies regularly, because I don't know how to write Spanish. In a little while I am going to Baltimore to visit you. SSS, Senorita B.K."

~~Exhibit~~

Exhibit # 15 "Write in English & I will try to translate"

I am acquainted with the Spanish
language and certify that the following
are correct translations of Exhibits.

nos 2, 4 Aug 15-

John O'Neil

over

over

3/2/81

IN THE CIRCUIT COURT OF

BALTIMORE CITY. 142

18, 1926

ROBERT C. WASHINGTON

VS.

ROSETTA WASHINGTON

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

Davis & Evans

ATTORNEYS FOR RESPONDENT.

130538

DAVIS & EVANS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

Ad 19th April 1926

BAUMGARTEN & CO., INC.

WHEREBY having answered the material allegations of
this Bill, your respondent prays:

- (a) Alimony pendente lite.
- (b) Counsel fee.
- (c) That the bill be dismissed with costs to the plaintiff.


SOLICITORS FOR RESPONDENT.