

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

*B 32
1926*

SAMUEL BROWN

VS.

SADIE BROWN

1819 Kavanaugh St.

BILL FOR DIVORCE.

B 30323

Mr. Clerk:-

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF.

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

FD 20 Jan 1926

SAMUEL BROWN

:

IN THE CIRCUIT COURT

VS.

:

OF

SADIE BROWN

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator~~s~~ complaining respectfully represents:

1. That he was married to his wife, Sadie Brown, on the 11th day of August, 1912 in Baltimore City, and with whom he resided until the 11th day of January, 1923 when the defendant deserted the plaintiff.
2. That though the conduct of your Orator toward the said Sadie Brown has always been kind, affectionate and above reproach, she has, without any just cause or reason, abandoned and deserted him and has declared her intentions to live with him no longer, and that such abandonment has continued uninterruptedly for more than three years and is deliberate and final and the separation of the parties is beyond any reasonable expectation of reconciliation.
3. That ever since said marriage, your Orator has behaved himself as a faithful, chaste and affectionate husband toward the said Sadie Brown.
4. That the said Sadie Brown, has on divers days and times since said marriage committed the crime of adultery with divers, lewd and abandoned men, whose names are unknown to your Orator and said offense has not been condoned by your Orator.
5. That your Orator has not lived or co-habited with the said defendant since said desertion and since he discovered said adulteries.
6. That there are no children born as result of said marriage.

7. That the defendant is a resident of the City of Baltimore, in the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this bill.

TO THE END, THEREFORE:

(a) That your Orator may be divorced a Vinculo Mayrimonii from the said Sadie Brown.

(b) That he 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 Subpoena directed against the said Sadie Brown, commanding and requiring her to be and appear in this Court on some day certain 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.

Beers & Evans

ATTORNEYS FOR PLAINTIFF.

P 395

Ct. Ct.

B 32
192 6

Docket No.

Samuel Brown

vs.

Sadie Brown

1819 Kavanaugh St.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

pw
330323

~~B 50553~~

24

Filed

26 *January*, 192*6*

Davis & Evans

SOLICITOR

14

Summonsed and a copy of the Process left with the defendant

*John E. Patee
Sheriff*

Fees \$0.80

*(Koglovsky)
1/22/25*

EQUITY SUBPOENA

The State of Maryland

To Sadie Brown

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

Samuel Brown

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 11th day of January 1926 Issued the 20th day of January, in the year 1926

Chas. R. Whitford 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.

32

Ct. Ct.

1926

Docket B 66

Samuel Brown

vs.

Sadie Brown

Decree Pro Confesso.

Sapp

No. B 30323
(3)

Filed 11 Feb 1926

Samuel Brown
vs.
Sadie Brown

IN THE
Circuit Court
OF
BALTIMORE CITY.

Jan

Term, 1926

The Defendant having been duly summoned (~~notified by Order of Publication~~) to appear to the Bill of Complaint, and having failed to appear thereto, according to the exigency of the writ, (~~said Order~~).

It is thereupon this *11th* day of *February* in the year nineteen hundred and twenty *six* by the Circuit Court of Baltimore City, ADJUDGED, ORDERED and DECREED, that the complainant is entitled to relief in the premises, and that the bill of Complaint be and is hereby taken pro confesso against the defendant. But because it doth not certainly appear to what relief the Plaintiff is entitled, it is further *Adjudged*, and *Ordered*, that one of the Examiners of this Court, take testimony to support the allegations of the bill.

Charles F. Stew

3/13/2/79

Doc. B $\frac{32}{1926}$

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Samuel Brown

vs.

Ladie Brown

No. 30323 B
(4)

PLAINTIFF'S COSTS

Examiners..... \$.....
Copies.....
Sheriff.....
Stenographer.....
\$ _____

DEFENDANT'S COSTS

Examiners..... \$.....
Copies.....
Sheriff.....
Stenographer.....
\$ _____

Fd 7th May 1926

Samuel Brown

vs.
Sadie Brown

In the Circuit Court
OF BALTIMORE CITY.

Decree Pro Confesso having been passed in said cause 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 eleventh day of February 1926, met on the eleventh day of February in the year nineteen hundred and twenty-six at my office, in the city of Baltimore, in the State of Maryland, and assigned the eleventh day of February in the same year at one-thirty o'clock in the afternoon and the office of A. de Russy Sappington, 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:—

A. deRussy

SAMUEL BROWN

VS.

SADIE BROWN.

Testimony taken before me, A. deRussy
Sappington, Examiner, at my offices in the Title
Building, Baltimore, Maryland, on February 11,
1926, at 1.30 o'clock in the afternoon.

--

Thereupon---

SAMUEL BROWN,

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

By the Examiner:

Q State your name, residence and occupation?

A Samuel Brown, Arlington, Virginia,
Minister of the Gospel.

Q Do you know the parties to this suit?

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

By Mr. Davis:

Q When, where and by whom were you married?

A On the 11th of August, 1912, in Baltimore, Maryland, by a Minister of the Gospel.

Q Are you living with your wife now?

A No, sir.

Q Which one left the other, and when?

A She left me on the 11th of January, 1923.

Q Where were you living at the time?

A Harford County, Maryland.

Q Did you give her any just cause to leave?

A No, sir.

Q Were you a kind, affectionate and faithful husband?

A Yes, just as good as I could be.

Q Are there any children as result of your marriage?

A No.

Q Has your wife, the defendant, been a resident of the City of Baltimore, State of Maryland for more than two years prior to the filing of this suit?

A Yes, sir.

Q State what happened on the day of the separation?

A She told me she was going to leave because she was dissatisfied, and she took her clothes and left.

Q Has the separation continued uninterruptedly for more than three years prior to the filing of this suit?

A Yes, sir.

Q Is it deliberate and final?

A Yes, sir, it is.

Q Any hope of reconciliation?

A No, sir.

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 Brown

Thereupon---

ROBERT H. CARR,

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

By the Examiner:

Q State your name, residence and occupation?

A Robert H. Carr, 1736 Ashland Avenue messenger.

Q Do you know the parties to this suit?

A Yes.

By Mr. Davis:

Q Do you remember when they lived together as husband and wife?

A I do.

Q Were they known and recognized in the community in which they lived as husband and wife?

A Yes, sir.

Q Are they living together now?

A No, sir.

Q Which one left the other, and when?

A She left him on the 11th of January,
1923.

Q What kind of a husband was he?

A He was a good husband and an upright
man and treated her fine.

Q Was he a kind, affectionate and faithful
husband?

A He was.

Q Did he give her any just cause to leave?

A No, sir.

Q Was the separation continued uninterruptedly
for more than three years prior to the filing of
this suit?

A It has.

Q Is the separation deliberate and final
and beyond any reasonable hope or expectation of
reconciliation?

A Yes, sir.

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

A Yes, sir, she has.

Q Have you ever heard her say that she would not live with her husband?

A Yes, sir, I did; I heard her say that myself.

Q Are there any children as result of the marriage?

A No, sir.

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

Robert H. Barr

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.....*seventh*..... day of.....*May*..... in the year of Our Lord nineteen hundred and.....*twenty-six*..... at the City of Baltimore, in the State of Maryland.

A. de Russy Sappington (SEAL).
Examiner.

There are.....*two*..... 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.

Circuit Court

32
19 26

Docket No. B66

Samuel Brown

vs.

Sadie Brown

Order of Reference
and Report

Syons
Syons

B No. 30323
(6)

Order Filed 7 day of May 1926
Report Filed 7 day of June 1926

Samuel Brown

vs.

Sadie Brown

IN THE

Circuit Court

OF

BALTIMORE CITY

May Term, 1926

This case being submitted, without argument, it is ordered by the Court, this 7 day of May, 1926, that the same be and it is hereby referred to Wm Lyons, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

James P. Gortex

Report of Auditor and Master

Bill for divorce a vinculo matrimonii filed by the husband against his wife on the ground of abandonment. Code Art. 16, Sec. 37-42.

Defendant summoned but failed to answer.

Defendant's residence in Baltimore City for more than two years prior to the filing of the bill proven.

The marriage proven.

Abandonment uninterruptedly for three years, its finality and the irreconcilability of the parties proven.

Decree pro confesso was passed against the defendant and more than thirty days have since elapsed.

Case ready for decree.

William P. Lyons

Auditor and Master

May 21, 1926

52-1926
IN THE CIRCUIT COURT OF
BALTIMORE CITY.

B 32
1926.

SAMUEL BROWN

VS.

SADIE BROWN

PETITION & ORDER THEREON

B 30323.

Mr. Clerk:-

67
Please file.

Davis Evans
ATTORNEYS FOR PETITIONER

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

Filed 20 May 1926

SAMUEL BROWN : IN THE CIRCUIT COURT

VS. : OF

SADIE BROWN : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The petition of Samuel Brown, complainant in the above entitled cause respectfully represents:

1. That on or about the 11th day of February, 1926 a decree Pro Confesso was filed in the above entitled cause.
2. That the decree was filed before the time allowed the defendant to answer had expired.
3. That the plaintiff took testimony under that decree.
4. That the plaintiff desires to have the decree signed on the 11th day of February rescinded that he may file another decree.

WHEREFORE YOUR PETITIONER PRAYS:

- (a) That the decree pro confesso signed on the 11th day of February, 1926 be rescinded.
- (b) Such other and further relief as the case may require.


ATTORNEYS FOR PETITIONER

Ordered by the Circuit Court of Baltimore City this 20th
day of May, 1926 that the decree Pro Confesso filed on the 11th
day of February, 1926 be and the same is hereby rescinded.

W. Frank

32
1926

Docket

Ct. Ct.

866

Samuel Brown

vs.

Sadie Brown

Decree Pro Confesso.

Lyzons.

No.

B30323.

[7]

Filed

20 May 1926

Samuel Brown

vs.

Sadie Brown

IN THE
Circuit Court
OF
BALTIMORE CITY.

May Term, 1926

The Defendant having been duly summoned (~~notified by Order of Publication~~) to appear to the Bill of Complaint, and having failed to appear thereto, according to the exigency of the writ, (said Order).

It is thereupon this *20* day of *May* in the year nineteen hundred and twenty *26* by the Circuit Court of Baltimore City, ADJUDGED, ORDERED and DECREED, that the complainant is entitled to relief in the premises, and that the bill of Complaint be and is hereby taken pro confesso against the defendant. But because it doth not certainly appear to what relief the Plaintiff is entitled, it is further *Adjudged*, and *Ordered*, that one of the Examiners of this Court, take testimony to support the allegations of the bill.

Vene Pro Tunc as of the 25th day of Feb 1926
It is further ordered that the testimony taken under
the decree of Feb 11th 1926 be and is hereby adjudged
and ordered to be considered as having been taken
under this decree,
E. J. Frank

CIRCUIT COURT

B 32
1926 No. Docket

SAMUEL BROWN

vs.

SADIE BROWN

Recorded

Folio 153 1926

Decree of Divorce

B No. 30323
187

Ed 8 June 1926

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

William P. Lyons
Auditor and Master.

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

.....
SAMUEL BROWN

VS.

.....
SADIE BROWN

May, ~~March~~ Term, 19.26..

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

It is thereupon, this *8th* day of *June* ~~May~~ -----, A. D. 1926,

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said

----- SAMUEL BROWN, -----

the above named Complainant be and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, SADIE BROWN.

And it is further Ordered, That the said ⁵ Complainant, Samuel Brown, ----- pay the cost of this proceeding.

James P. Gortler

32
1926

Docket

Ct. Ct.

866

Samuel Brown

vs.

Sadie Brown

Decree Pro Confesso.

Lyzons.

No.

B30323.

[7]

Filed

20 May

1926

Samuel Brown

vs.

Sadie Brown

IN THE
Circuit Court

OF
BALTIMORE CITY.

May Term, 1926

The Defendant having been duly summoned (~~notified by Order of Publication~~) to appear to the Bill of Complaint, and having failed to appear thereto, according to the exigency of the writ, (said Order).

It is thereupon this *20th* day of *May* in the year nineteen hundred and twenty *26* by the Circuit Court of Baltimore City, ADJUDGED, ORDERED and DECREED, that the complainant is entitled to relief in the premises, and that the bill of Complaint be and is hereby taken pro confesso against the defendant. But because it doth not certainly appear to what relief the Plaintiff is entitled, it is further *Adjudged*, and *Ordered*, that one of the Examiners of this Court, take testimony to support the allegations of the bill.

None Pro Lunc as of the 25th day of Feb 1926
It is further ordered that the testimony taken under the decree of Feb 11th 1926 be and is hereby adjudged and ordered to be considered as having been taken under this decree,
E. J. Frank

1
CIRCUIT COURT

B 32
1926 No. Docket

SAMUEL BROWN

VS.

SADIE BROWN

Recorded

Folio 153 1926

Decree of Divorce

B No. 30323
(8)

Ed 8 June 1926

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

William P. Lyons
Auditor and Master.

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

..... SAMUEL BROWN

VS.

..... SADIE BROWN

..... *May*, ~~March~~ Term, 19..26..

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

It is thereupon, this *8th* day of *June* ~~May~~, A. D. 1926,

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said

..... SAMUEL BROWN,

the above named Complainant be and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, SADIE BROWN.

And it is further Ordered, That the said Complainant, Samuel Brown, pay the cost of this proceeding.

James P. Gorté