

IN THE CIRCUIT COURT NO. 2

BALTIMORE OF
CITY.

BENJAMIN ABRAMS

vs.

ANNIE ABRAMS

Bill for divorce, annulment

*Mr Clerk
Please file*

*C. C. Fitzgerald
Sol for Plaintiff
No 15715-13*

CORNELIUS C. FITZGERALD
Law and Real Estate
37-39-41 Courtland Building
215 COURTLAND STREET
BALTIMORE, MD.

FILED

21st January 1916

The Daily Record Print, Baltimore, Md.

BENJAMIN ABRAMS " IN THE CIRCUIT COURT NO. 2
 vs. " of
 ANNIE ABRAMS. " BALTIMORE CITY.
 " " " " " " " " " " " "

To the Honorable the Judge of said Court:-

Your orator complaining respectfully represents:-

- I. THAT he was married to his wife, Anne Abrams, about December 1, 1893, with whom he resided in Baltimore City until about September 10, 1896.
- II. THAT though the conduct of your orator toward the said Annie Abrams has always been kind, affectionate and above reproach, she has without just cause or reason abandoned and deserted him and has declared her intention to live with him no longer, and that such abandonment has continued, uninterrupted, for more than five years and is deliberate and final and the separation of the parties is beyond any reasonable expectation of reconciliation.
- III. THAT there are no children born as result of said marriage.
- IV. THAT your orator has not lived nor co-habited with the said defendant since said desertion.
- V. THAT both your orator and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more then twenty years.

To the end therefore:-

- a. THAT your orator may be divorced a vinculo matrimonii from the said Annie Abrams.
- 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 Ancie Abrams,
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.

C. C. Fitzgerald
SOLICITOR FOR COMPLAINANT.

31 25
Ct. Ct. No. 2

23
1916

B Docket No. 25

Abrams

vs.

Abrams

Subpoena to Answer Bill of Complaint

Pro

No. 15715-B
2

copy - Copied

Filed 14th January, 1916
C. C. Fitzgerald
Solicitor.

S.P. 2471

B

*How to X Thomas J. McSherry
Sheriff*

EQUITY SUBPOENA
The State of Maryland.

To

Annie Abrams

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 *February*, 191*6*, to answer the complaint of

Benjamin Abrams

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

WITNESS, the honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *10th* day of *January*, 191*6*

Issued the *21st* day of *January*, in the year 191*6*

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.”

Ct. Ct. No. 2

13
1916

B Docket No. 25

Abrams

vs.

Abrams

Subpoena to Answer Bill of Complaint

Copy

No.

Filed, 191

.....
Solicitor.

EQUITY SUBPOENA
The State of Maryland.

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TRUE COPY TEST,

Ja

CLERK.

IN THE CIRCUIT COURT

NO. 2

B 23
1916

Baltimore City.

BENJIMAN ABRAMS

VS.

ANNIE ABRAMS

Answer of defendant
for

for clerk please
file

(Answer) for

No 15415 B

J. STEWARD DAVIS

ATTORNEY AT LAW

COURTLAND BUILDING

215-217 COURTLAND ST.

BALTIMORE

for 11th February 1916

Benjiman Abrams

vs.

Annie Abrams

In The Circuit Court No.2

of

Baltimore City.

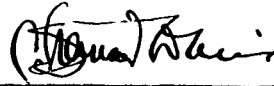
To the Honorable, the Judges of said Court:-

The answer of Annie Abrams, defendant in this cause, answering says:-

I. That she admits the allegations in paragraphs 1, 3, 4, and 5; but she denies the allegations in paragraph 2 in plaintiff's bill, and puts him to the strict proof thereof.

Wherefore--your respondent having fully answered said Bill of Complaint prays to be hence dismissed with costs.

And as in duty bound, etc.



Attorney for Defendant

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23
1916 Cir. Ct. No. 2.
Docket No. 25B

Benjamin Adams

vs.

Adams

GENERAL REPLICATION

Mr. Clerk,
Please file,

C. G. Fitzgerald

Solicitor for Plaintiff.

No. 15715B

4

Filed 28 February 1916

Benjamin Abram

In the CIRCUIT COURT No. 2
of Baltimore City.

vs.

Anna Abrams

TERM 191

To the Honorable

Judge of Said Court:

The Plaintiff join issue on the matters alleged in the answer of

Anna Abrams defendant

so far as the same may be taken to deny or avoid the allegations of the bill.

C. L. Fitzgerald

Solicitor for Plaintiff.

Circuit Court No. 2

23

1916

Docket.....

Benjamin Abrams

vs.

Anna Abrams

Sapp

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

No. 15715 B
5.

Filed 28th February 1916

Benjamin Abrams

vs.

Ann Abrams

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 *Benjamin Abrams*

Plaintiff

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

C. C. Fitzgerald
Solicitor for *Plaintiff*

ORDERED, this *28th* day of *February*, 191*6*, 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.

Carroll T. Bond

23

1916

J

Cir. Ct. No. 2.

Docket No. 25A

Benj. Abrams

vs.

Annie Abrams

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file

C. C. Fitzgerald
Solicitor for Plaintiff.

No. 15715 B
7

Filed 23rd March 1916

By *Benjamin Abrams*
vs.
Annie Abrams

In the Circuit Court No. 2
Of Baltimore City.

TERM 191

To the Honorable

Judge of Said Court:

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

C. C. Fitzgerald

Solicitor for Plaintiff.

(H. W. H. H.)

Solicitor for Defendant.

Ct. Ct. No. 2

23
1916 J

Docket No. 45

Benjamin Abrams

VS.

Anna Abrams

Order of Reference
23rd March 1916
and Report

Parents on

No. 15715 B
8-10

Order Filed *23rd* day of *March* 1916
Report Filed *31st* day of *March* 1916

Benjamin Abram

IN THE
Circuit Court No. 2

VS.
Anna Abrams

OF
BALTIMORE CITY

March

Term, 1916

This case being submitted, without argument, it is ordered by the Court, this 23rd day of March 1916, that the same be and it is hereby referred to Alex. H. Robertson, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Carroll T. Bond

Report of Auditor and Master

Bill filed by husband against wife for a divorce a vinculo matrimonii on the ground of abandonment for three years Code Art. 16.5.36
Defendant appears and answers by solicitor authority in writing.
Proof shows marriage valid and abandonment of plaintiff for at least three years continuous deliberate and without hope of reconciliation case submitted and ready for decree Alex H Robertson Auditor & Master

REAL ESTATE
CLAIMS COLLECTED

PHONE, ST. PAUL 2471

RESIDENCE
1224 JEFFERSON ST.

J. STEWARD DAVIS

ATTORNEY AND COUNSELOR AT LAW
COURTLAND BUILDING
217-219 COURTLAND STREET, THIRD FLOOR FRONT

BALTIMORE, MD. Feb. 1 1916

In the case of Benjamin Abrams
vs Annie Abrams, Circuit Court, No. 2
J. Steward Davis, please enter your appear-
ance for me in the above case
Annie Abrams

IN THE
CIRCUIT COURT #2 OF
BALTIMORE CITY

P 237
1916

Benjamin Abrams

vs

Annie Abrams

Abrams

vs

Abrams

Authority for Appearance

Authority

No 15715 B
19

Ed. 31 March 1916

Circuit Court No. 2

B

23
1916

No. 24 Docket

BENJAMIN ABRAMS.

vs.

ANNIE ABRAMS.

Decree of Divorce

3d 6th April 1916
mch

R

No. 15715 B.
11.

Copy - Copied

Filed 6th April 1916

This is a proper decree to be passed

Alex. McLaughlin
Auditor & Master.

Benjamin Abrams.

vs.

Annie Abrams.

IN THE

Circuit Court No. 2

OF

BALTIMORE CITY.

March Term, 1916.

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

It is thereupon, this ^{6th} day of April Anno Domini, one thousand nine hundred and sixteen by the CIRCUIT COURT No. 2 OF BALTIMORE CITY, *Adjudged, Ordered and Decreed*, that the said Benjamin Abrams

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

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

Carroll T. Bond

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_____

Doc.

D 23
1916

3/18/12/54

In the Circuit Court, ~~2~~
OF BALTIMORE CITY

DEPOSITIONS

Genj Abrams,
vs.
Charles Abrams,

No. *15715 B*

PLAINTIFF'S COSTS

Examiners..... \$ *800*

Copies.....

Sheriff.....

Stenographer.....

\$ _____

DEFENDANT'S COSTS

Examiners..... \$ _____

Copies.....

Sheriff.....

Stenographer.....

\$ _____

Ad. 22nd March 1916

3rd Apr 1916

Benj. A. Brasse,
vs.
Grace A. Brasse,

In the Circuit Court
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
28th day of February 1916, met on
the 17th day of March in the year nineteen
hundred and sixteen at my office, in the City of Baltimore, in the State
of Maryland, and assigned the 18th day of March
in the same year at 3 o'clock in the after-noon and the
office of C. C. Fitzgerald, City Solf 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:—

BENJAMIN ABRAMS, 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. Benjamin Abrams, 1338 Presstman Street; driver of truck.

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

A. I am the Plaintiff and the Defendant is my wife.

BY MR. FITZGERALD:

1 Q. When, where and by whom were you married?

A. December 1893 by the Reverend Mr. Henry M. Carroll on Gkld Street in Baltimore City.

2 Q. What was your conduct towards your wife?

A. I was a kind and affectionate husband and provided for her and was true to her.

3 Q. How did she treat you?

A. She treated me pretty good for a year, then she began to treat me pretty rough; she finally left me in September 1896.

4 Q. Have you lived or cohabited with your wife since she left you?

A. No.

5 Q. Are there any children living as the result of

Benjamin Abrams.

this marriage?

A. No.

6 Q. Are you and Mrs. Abrams citizens of the State of Maryland and have you resided in the City of Baltimore for more than ten years?

A. Yes; and I have lived here for thirty-two years.

7 Q. Do you think that this desertion is deliberate and final and beyond any reasonable hope of a reconciliation?

A. Yes.

8 Q. Did you give your wife any just cause or reason to desert you?

A. No sir; I did not.

9 Q. Where did she go to live when she left you?

A. On Bruce Street at her mother's.

10 Q. Has this abandonment and desertion continued uninterruptedly for more than three years and is the separation deliberate and final?

A. Yes; and it has been for twenty years.

CROSS EXAMINATION WAIVED.

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, Benj Abrams

ETTA HILL, 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. Etta Hill, 1338 Presstman Street; seamstress.
- 2 Q. Do you know the parties to this suit?
- A. Yes; I have known him all my life; he is my Uncle and I have known her since they were married.

BY MR. FITZGERALD:

- 1 Q. Are they now living together?
- A. No.
- 2 Q. Were you present at their marriage?
- A. No.
- 3 Q. When they lived together, were they known to their relatives and friends as husband and wife?
- A. Yes; and they held themselves out as husband and wife.
- 4 Q. Do you know which left the other?
- A. His wife left him, about twenty years ago.
- 5 Q. Do you know whose fault it was?
- A. It was his wife's fault.
- 6 Q. Do you know how Mr. Abrams treated his wife?
- A. Very kind and provided for her.

Etta Hill.

7 Q. Are there any children born to them?

A. No.

8 Q. Have you seen Mr. Abrams frequently since his wife left him?

A. Yes.

8 Q. Do you think they have lived or cohabited together since she left him?

A. No; he has lived with his sister; my Aunt, ever since.

10 Q. Has this abandonment and desertion continued uninterruptedly for more than three years prior to the filing of this suit?

A. Yes; over twenty years.

11 Q. Is the separation deliberate and final and beyond any hope of a reconciliation between them?

A. Yes.

12 Q. Do they both live in Baltimore City, and have they for more than five years?

A. Yes.

13 Q. Did he give his wife any just cause or reason to desert him?

A. No.

14 Q. Do you know what led to the separation between

Etta Hill.

the parties?

A. Nothing seemed to satisfy her in spite of all he did for her; she seemed dissatisfied and went home to her mother's, and she took her clothes and bed room suit when she left.

CROSS EXAMINATION WAIVED.

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,*

Etta Hill.

FRED ABRAMS, a witness of lawful age, produced on behalf of the Plaintiff, 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. Fred Abrams, 721 Baker Street; Janitor.
- 2 Q. Do you know the parties to this suit?
 A. Yes; the Plaintiff is my brother and I have known his wife about 25 years.

BY MR. FITZGERALD:

- 1 Q. Do you know whether or not your brother and his wife are married?
 A. Yes; I know it; I saw their license when they came back and said they had been married and they lived together as man and wife and their friends and family considered and treated them as married. They first came back to his mother's at 2100 Etting Street to live, and lived there a while; I was living there at the time.
- 2 Q. How did Mr. Abrams treat his wife?
 A. Kindly and provided for her and true to her.
- 3 Q. Are they now living together?
 A. No.
- 4 Q. Which left the other and when?
 A. She left him about twenty years ago.

Fred Abrams.

5 Q. Whose fault is it that they are separated?

A. His fault; I lived there.

6 Q. Under what circumstances did she leave him?

A. She deliberately took her own things and went home to her mother and she said she was going to her mother's, and that she did not want anything to do with him at all.

7 Q. Have they lived or cohabited together since she left him?

A. No; he continued to live at the house after she left and I have seen him frequently since.

8 Q. Did he give her any just cause or reason to leave him?

A. No.

10 Q. Has this abandonment and desertion continued uninterruptedly for more than three years prior to the filing of this suit, and is it deliberate and final, and beyond any reasonable hope of a reconciliation?

A. Yes; and has been over twenty years, and there is no hope of a reconciliation.

11 Q. Any children born of their marriage?

A. No.

Fred Abrams.

12 Q. How long have the parties lived in Baltimore City, Maryland.

A. They have both lived here over twenty-five years and still live here.

CROSS EXAMINATION WAIVED.

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, Fred Abram

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 22nd day of March in the year of Our Lord nineteen hundred and nineteen 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 _____

Defendant's _____ Exhibit _____

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 each of which I was employed by the Plaintiff _____, and on none by the Defendant _____.

A. de Russey Sappington
Examiner.