

IN THE CIRCUIT COURT OF

BALTIMORE CITY

*B 516
1926*

SAMUEL KEYS

VS.

LOUISE KEYS.

1739 Madison Ave

B 31236.

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

Davis & Evans.
ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

FD 18th Nov 1926

SAMUEL KEYS

:

IN THE CIRCUIT COURT

VS.

:

OF

LOUISE KEYS

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

- I. That he was married to his wife, Louise Keys, on the 31st day of October, 1917 and with whom he resided until the 9th day of July, 1923 when the defendant deserted the plaintiff.
2. That though the conduct of your Orator toward the said Louise Keys, 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 your Orator has not lived or co-habited with the said defendant since said desertion.
4. That there are no children born as issue of said marriage.
5. 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 Louise Keys.

(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 Louise Keys, 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.

Davis Hewitt

ATTORNEYS FOR PLAINTIFF

P 802

B 516

Ct. Ct.

1926 Docket No.

Samuel Keys

v2

Louise Keys.

1739 Madison Ave

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B 91236
(2)

Filed

9 Dec

1926

Davis and Evans

SOLICITOR

11

Summoned and a copy of the Process left
with the Defendant
Ly cutt
(11/22/26)
John & Potes
Sherry
Fees \$0.80

EQUITY SUBPOENA

The State of Maryland

To

*Louise Keys,
1739 Madison Ave.*

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

Samuel Keys.

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 **November** 192 **6**

Issued the **18th** day of **November**, in the year 192 **6**

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.

516-1926

B 516

Ct. Ct.

1926

Docket

Samuel Keys

vs.

Souise Keys

Decree Pro Confesso.

"Frick"

No.

B 31236

(3)

Filed 31 Dec 1926

[Decree Pro Confesso]

Samuel Keys
.....
vs.

Souise Keys
.....

IN THE
Circuit Court
OF
BALTIMORE CITY.

nov
.....

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 *31st* day of *December* in the year nineteen hundred and twenty *24* 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.

C. Thomas

Docket B 516/1926

IN THE CIRCUIT COURT

Samuel Keys

vs

Louise Keys

3/13/19

DEPOSITIONS

B No. 31236
(4)

PLAINTIFF'S COST

Examiner _____ \$ _____

Copies _____

Notices _____

Sheriff _____

Stenographer _____

\$ _____

DEFENDANT'S COSTS

Examiner _____ \$ _____

Copies _____

Notices _____

Sheriff _____

Stenographer _____

\$ _____

GEORGE ARNOLD FRICK, Examiner

Filed 12 day of Feb 1927

Samuel Keys

.....

vs.

Louise Keys

.....

In the Circuit Court
OF BALTIMORE CITY

A decree pro confesso having passed

and notice having been given me by the Solicitor for the Plaintiff
of a desire to take testimony in the same, I, GEORGE ARNOLD FRICK, one
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
31st day of December, 1926, met on
the 3rd day of January in the year nineteen
hundred and twenty-seven, at my office, in the City of Baltimore, in the
State of Maryland, and assigned the 4th day of January
in the same year at three o'clock in the afternoon and the
office of The Examiner 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:

TESTIMONY taken at the office of George Arnold Brick Examiner on Tuesday, January 4th, 1927, at three o'clock in the afternoon.

Present: J. Steward Davis, Counsel for Plaintiff.

Thereupon:

SAMUEL KEYS, the plaintiff, produced as a witness on his own behalf, being first duly sworn, deposes and saith as follows, that is to say -

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Samuel Keys, 1538 McCollough Street, Waiter.

2 Q- You are the plaintiff in this proceeding?

A- Yes, sir.

3 Q- How long have you known your wife, the defendant?

A- About twelve years.

BY MR.DAVIS:

4 Q- When were you married?

A- I was married October 31st, 1917.

5 Q- Where?

A- Alexandria, Virginia by a minister of the Gospel.

Samuel Keys.

6 Q- How long did you and Mrs.Keys live together?

A- We separated July 9th, 1923.

7 Q- Which left the other?

A- She left me.

8 Q- How did it happen?

A- I came home from work one afternoon and when I walked in the house I noticed some of the things were missing, such as her clothes and the likes. I went to the wardrobe and everything was gone. She didn't leave any note or anything.

9 Q- Did you remain at the house?

A- I lived there until the next February, 1924.

10 Q- Did she ever return to you?

A- No, she never came back.

11 Q- Have you seen her since the separation?

A- Yes, sir.

12 Q- What has she said to you, if anything?

A- I saw her several times and she wouldn't speak. One day I met her and I asked her if she didn't expect to come back to me and she said "No, never."

13 Q- Did she say that more than once?

A- Yes, sir, several times. Then I didn't see her no more until we were in Court and the lawyer asked her if she expected to return to me and she said "no, never."

14 Q- How did you treat your wife?

A- I was as nice as I could be. Did all I could for her.

Samuel Keys.

15 Q- Were you always kind and affectionate and was your conduct above reproach?

A- Yes, sir.

16 Q- Did you always support her?

A- Yes, sir.

17 Q- Did you give her any cause to leave you?

A- Not to my knowledge.

18 Q- Has the separation continued uninterruptedly for more than three years prior to the filing of this bill of complaint?

A- Yes, sir.

19 Q- And it was her own deliberate and final act?

A- Yes, sir.

20 Q- Is there any possible hope of a reconciliation?

A- Never, no.

21 Q- Have you lived or cohabited with her since she left you?

A- Absolutely, no.

22 Q- Were there any children born of your marriage?

A- No children.

23 Q- You are a resident of the City of Baltimore and State of Maryland and have been a resident for more than two years prior to the filing of this suit?

A- Yes, sir.

24 Q- And your wife is also a resident of the City of Baltimore and State of Maryland and has been a resident

Samuel Keys

for more than two years prior to the filing of this
suit?

A- Yes, sir.

QUESTION BY THE EXAMINER:

Do you know or can you state any other matter or thing that may be of benefit or advantage to 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.

Answer:

No Samuel N. Key's

EDGAR MANNNS, a witness of lawful age, produced on behalf of the plaintiff, being first duly sworn, deposeth and saith as follows, that is to say -

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Edgar T.Manns, 1505 North Mount Street, Waite.

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

A- Yes, sir.

3 Q- How long have you known them?

A- About six or seven years.

BY MR.DAVIS:

4 Q- You were not present at the wedding of Mr. and Mrs. Keys?

A- No.

5 Q- You know that they were married, lived together as man and wife and held themselves out as man and wife?

A- Yes, sir.

6 Q- Did you visit them?

A- Once or twice a month.

7 Q- They separated July 9th, 1923? Is that correct?

A- That's correct.

8 Q- Did he leave her or did she leave him?

A- Mrs.Keys left Mr.Keys.

9 Q- How do you know that?

Edgar Manns

A- I went home with him that afternoon. He told me that she had gone and that she had taken everything with her. I went in and looked around with him and sure enough she had taken everything. He asked me what he should do and I said I didn't know.

10 Q- Did Mr.Keys continue to live there?

A- Yes, sir, for sometime.

11 Q- Did she ever return?

A- No, sir.

12 Q- Have you seen her since she left?

A- Yes.

13 Q- Did she ever say she wished to return?

A- No, sir. She didn't say anything at all about that.

14 Q- How did Mr.Keys treat her?

A- Very good.

15 Q- Was he kind and affectionate and was his conduct above reproach?

A- Yes, sir.

16 Q- Did he give her any cause for her to abandon him?

A- Not to my knowledge.

17 Q- Has the separation continued uninterruptedly since July 9th, 1923?

A- Yes, sir.

18 Q- Was it her own deliberate and final act?

A- Yes, sir.

19 Q- Is there any hope or a reconciliation?

Edgar Manns.

A- Not to my knowledge.

20 Q- Has he cohabited or lived with his wife since she left him?

A- No, sir.

21 Q- Were there any children born of their marriage?

A- No, sir.

22 Q- Mr. Keys is a resident of the City of Baltimore and the State of Maryland and has been for more than three years prior to the filing of this suit?

A- Yes, sir.

23 Q- Is she a resident of Baltimore and the State of Maryland and has she been for more than three years prior to the filing of this suit?

A- Yes, sir.

QUESTION BY THE EXAMINER:

Do you know or can you state any other matter or thing that may be of benefit or advantage to 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.

Answer: *No Edgar Mann*

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..... Twelfth..... day of February..... in the year of our Lord nineteen hundred twenty-seven..... at the City of Baltimore, in the state of Maryland.

George Arnold Frick, { SEAL }
Examiner.

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

Defendant's..... Exhibit.....

George Arnold Frick,
Examiner.

I, GEORGE ARNOLD FRICK, 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.....

George Arnold Frick,
Examiner.

Circuit Court

19 26

Docket No. 6673
576

Samuel Keys

vs.

Rouse Keys

**Order of Reference
and Report**

Lyon

B No. 31236.
57

Order Filed 12 day of Feb 1927
Report Filed 28 day of Feb 1927

Samuel Key

vs. *Louise Key*

IN THE
Circuit Court
OF
BALTIMORE CITY

January Term, 1927
12"

This case being submitted, without argument, it is ordered by the Court, this *12*" day of *February*, 19*27*, that the same be and it is hereby referred to *Wm P Lyons*, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

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. 37-52.

Defendant summoned but failed to answer.

Plaintiff'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

February 23, 1927

CIRCUIT COURT

B 516
1926 No. Docket

SAMUEL KEYS

VS.

LOUISE KEYS

Recorded

Volio 53 1027

Decree of Divorce

B No. 31236
(6)

fd 28 Feb 1927

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

William P. Lyons
Auditor and Master.

