

B 125
1922

In the Circuit Court No.2
of
Baltimore City.

Mary A. Woodyard

vs.

Uriah Woodyard.

Bill for Divorce
A Vinculo Matrimonii.

Mr. Clerk:

Please file etc.

No 21367 B

Roy S. Bond

Sol. for Complainant.

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

FILED *9 March 1922*

The Daily Record Co Print, Baltimore, Md.

Mary A. Woodyard (
vs.) In the Circuit Court, No. 2 of
Uriah Woodyard (Baltimore City.
(

To the Honorable, the Judge of said Court:

Your Oratrix, Mary A. Woodyard complaining respectfully says:

(1) That she was married to her husband, Uriah Woodyard, in Baltimore City, State of Maryland, on or about the 18th day of November, 1914, with whom she resided until on or about the 13th day of April, 1918.

(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, 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 is one child as issue of said marriage, Marjorie Woodyard, aged five years.

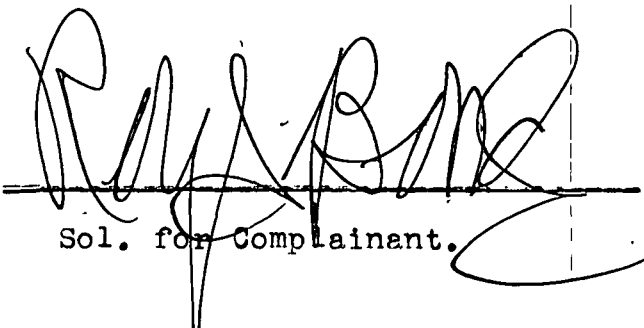
(5) That on or about the 12th day of April 1920, your Oratrix was granted a divorce A Mensa ^{et} Tere from her husband, the said Uriah Woodyard.

WHEREFORE YOUR ORATRIX PRAYS:

- a- A divorce A Vinculo Matrimonii from the defendant, Uriah Woodyard,
- b- The care and custody of the said minor child and maintenance for its support.
- c- Such other and further relief as the case may require.

May it please your Honor to grant unto your Oratrix,
the writ of subpoena, directed unto the said defendant, Uriah
Woodyard, residing at 1400 Jefferson 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 Complainant.

EQUITY SUBPOENA
The State of Maryland

To

Uriah Hoodyard
1400 Jefferson 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 *March*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Mary G Hoodyard

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 ~~MORRIS A. SOPER~~ ^{JAMES E. GORTER} Chief Judge of the Supreme Bench of Baltimore City, the *9* day of *January*, 192*2*

Issued the *9* day of *March*, in the year 192*2*

John Pleasants

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.)

160
Ct. Ct. No. 2

125
1922 B Docket No. 31

Woodyard
vs.
3/10/22
Woodyard

Subpoena to Answer Bill of Complaint

Pro

No. 21367 B
2

Copy - ~~leopard~~

Filed 13 March 1922
Roy A. Bond
Solicitor.

3

Summoned and a copy of the process
left with the defendant
(Timberlake) 3/10/22
Thomas F. McFueley
Sheriff
Fee \$0.80

FW

21 B 125/1922

In The Circuit Court
No 28
Baltimore City

Mary Woodford

vs

Anna Woodford

Susan T. Woodford

Mr Berk please file

No 21367B

3

DAVIS & BISHOP
ATTORNEYS AT LAW
BANNEKER BUILDING
14 E. PLEASANT STREET
BALTIMORE, MD.

of 28 March 1922

MARY A. WOODYARD : IN THE CIRCUIT COURT NO.2
VS. : OF
URLAH WOODYARD : OF BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the bill of the petitioner is as follows:


FIRST: Your respondent admits the allegations as contained in the first paragraph of the complainant's bill of complaint.

SECOND: Your respondent admits the allegations as contained in the second paragraph of the complainant's bill of complaint.

THIRD: As to the third paragraph of the complainant's petition, your respondent neither admits nor denies the allegations as contained therein.

FOURTH: Your respondent admits the allegations as contained in the fourth paragraph of the complainant's bill of complaint.

FIFTH: Your respondent admits the allegations as contained in the fifth paragraph of the complainant's bill of complaint.



Attorney for Respondent.

B 125/1922
Circuit Court No. 2

192

Docket

MARY WOODYARD

vs.

URIAH WOODYARD.

Japp

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

No. 21367 B.
H

Filed 30 March, 1922

MARY WOODYARD

vs.

URIAH WOODYARD.

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 Mary Woodyard, Plaintiff

in this case, respectfully shows that she desire s 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.

Roy R. Bond
Solicitor for Plaintiff.

ORDERED, this 30th day of March 1922, 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.

Wm. H. ...

3/12/14/60

Doc. 12 ¹²⁵
1922

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

DEPOSITIONS

Mary A. Woodyard

vs.

Urial Woodyard

No. 2136713
A

PLAINTIFF'S COSTS

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

DEFENDANT'S COSTS

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

1
Ad. 20 April 1922

Mary A. Woodyard

In the Circuit Court No. 2

vs.

OF BALTIMORE CITY.

Ursula Woodyard

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

thirtieth day of March 1922, met on

the fourth day of April in the year nineteen hundred and twenty-two at my office, in the City of Baltimore, in the State of Maryland, and assigned the

five day of April

in the same year at one-thirty o'clock in the afternoon and the office of Royl Bond, Esq. in the City and State

aforsaid, 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:—

8-2

WOODYARD,

v.

WOODYARD.

Testimony taken at the office of Roy S. Bond, Esq.,
215 St. Paul Place, Baltimore, Maryland,
April 5th., 1922, at 1.30 O'clock P. M.

MARY A. WOODWARD, the Plaintiff in this case,
produced on her 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. Mary A. Woodward, 424 Mosher Street; teacher.

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

A. Yes. I am the Plaintiff and my husband is the
Defendant.

BY MR. BOND:

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

A. I was married by the Reverend Mr. Harvey
Johnson, Pastor of the Union Baptist Church.

2 Q. When?

A. November 18th., 1914.

3 Q. Where?

A. In Baltimore, Maryland.

4 Q. Was the Reverend Mr. Johnson a Regularly
Ordained Minister of the Gospel?

Mary A. Woodward.

A. Yes.

5 Q. Connected with what Church.

A. Baptist Church.

6 Q. Were you married at the Church or in the parsonage?

A. I was married at my home; I had a regular wedding.

7 Q. In what City and State where you married?

A. State of Maryland, City of Baltimore.

8 Q. Are you living with your husband now.

A. I am not living with my husband.

9 Q. Did you leave him or did he leave you?

A. He left me.

10 Q. When?

A. April 13th., 1918

11 Q. State the circumstances under which he left you in April 1918?

A. Early in the Spring of 1918, I found my husband was infatuated with a woman in East Baltimore; from that time on he began to show that his entire way was changing towards me, and I knew that sooner or later I was going to have trouble with him, and around about April 1918, he began to take his things away from the house; on April 13th., 1918 he took as many things as he could carry away in a dress suit case, and then he sent a wagon to the house

Mary A. Woodward.

to get his other things. The things that he could not carry he sent for.

12 Q. And he has not lived with you since that time?

A. He has not lived with me since that time.

13 Q. Have you and your husband been residents of Baltimore City, State of Maryland, for more than two years prior to the filing of this suit?

A. Yes; we have been residents of Baltimore City for more than two years prior to the filing of this suit.

14 Q. Has this abandonment of you continued uninterruptedly for more than three years prior to the filing of this suit?

A. Yes; it has.

16 Q. Now, how did you always treat your husband?

A. Well, I was a chaste and affectionate wife to my husband and I did everything that I could for his happiness.

17 Q. And how did he in return treat you.

A. He always showed that nothing I did was appreciated; he was rude and uncouth even before the family - my own family where I lived.

Mary A. Woodward.

18 Q. Has your conduct towards been that of an affectionate and chaste wife?

A. My conduct has always been that of a chaste and affectionate wife.

19 Q. And above reproach in all respects?

A. Yes.

20 Q. Did you give him any cause or reason for abandoning and deserting you?

A. No sir; I did not give him any cause for deserting and abandoning me.

21 Q. Has he declared his intention not to live with you any more.

A. He has expressly declared it over and over again to my friends and to my family.

22 Q. Was his abandonment his deliberate and final act?

A. Yes.

23 Q. Is there any hope of a reconciliation between you and your husband?

A. No. There is not any.

24 Q. Are there any children as the result of this marriage?

A. This little girl Marjorie.

25 Q. How old?

Mary A. Woodward.

A. Five years old.

26 Q. Who has always had the custody of the child.

A. I have always had the custody of the child.

27 Q. And you ask for the continued custody of your child.

A. Yes indeed.

28 Q. And if you are awarded the same you are willing to do a mother's part in all respects?

A. Yes.

29 Q. Who supports the child?

A. Her father has sent six dollars a week through the Prisoners' Aid Society.

30 Q. He was ordered to pay something by means of a Decree?

~~A. Yes; a partial divorce decree.~~

31 Q. When was it that you were granted a partial divorce on the ground of desertion and non-support.

A. April 1920.

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. ---

Mary A. Woodyard,

ELLA L. BLACKWELL, 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. Ella L. Blackwell, 424 Mosher Street; Baltimore, Maryland; student.

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

A. I do; I know them both.

BY MR. POND:

1 Q. Were you present at the marriage of the parties to this suit?

A. Yes.

2 Q. Now, when were they married?

A. They were married November 18th., 1914.

3 Q. By whom were they married?

A. The Reverend Harvey Johnson.

4 Q. Where?

A. 424 Mosher Street, Baltimore, Maryland.

5 Q. By the Reverend Mr. Johnson?

A. Yes; I know him very well.

6 Q. Is he a Regularly Ordained Minister of the Gospel?

A. He is.

7 Q. Preaching at what Church.

Ella L. Blackwell.

A. The Union Baptist Church in Baltimore, Maryland.

8 Q. Are the parties to this suit living together now?

A. No; they are not.

9 Q. Did he leave her or did she leave him?

A. He left her.

10 Q. When?

A. April 13th., 1918.

11 Q. Under what circumstances did he leave her?

A. Prior to April 13th., 1918, he took his clothes out by degrees, and before that, he told me that - me personally that he was tired of married life and was sometime going to himself and on April 13th., 1918, he sent after his things, - he sent an express wagon after his trunks, and the rest of his things; he sent for the things that he had not carried away with him.

12 Q. Have they lived or cohabited together since that time?

A. No sir; they have not.

13 Q. Have both parties to this suit been residents of Baltimore City, State of Maryland, for more than two years prior to the filing of this suit?

Ella K. Blackwell.

A. Yes; they have.

14 Q. Have they been separated for more than three years prior to the filing of this suit?

A. Yes; they have.

15 Q. And how did she always treat her husband?

A. She was good and faithful and dutiful to him.

16 Q. Has her conduct always been that of a kind, affectionate and true wife towards her husband and has it been above reproach in all respects?

A. It has been.

17 Q. Did she give him any cause or reason for abandoning and deserting his wife?

A. She did not.

18 Q. How did he treat his wife?

A. He neglected her and he treated her uncouth before people and the whole family.

19 Q. Was his going away his own deliberate and final act?

A. It was.

Ella K. Blackwell.

20 Q. Is there any hope or expectation of them living together again?

A. None whatever.

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

A. Yes.

22 Q. Is there any children of this marriage?

A. One little girl.

23 Q. What is the name of the child?

A. Marjorie.

24 Q. How old?

A. Five years old.

25 Q. Who, in your opinion, is the fit and proper party to have the care and custody of these children?

A. The mother.

26 Q. With whom has she always been?

A. She has always been with her mother.

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.
Ella L. Blackwell

CARRIE GROSS, a witness of lawful age, produced on behalf of the Plaintiff, having been first duly sworn, deposes and saith as follows, that is to say:

BY THE EXAMINER:

- 1 Q. State your name residence and occupation?
A. Carrie Gross, 1004 Druid Hill Avenue; Clerk.
2 Q. Do you know the parties to this suit?
A. Yes.

BOND:

- 1 Q. Were you present at the marriage of the parties to this suit?
A. I was.
2 Q. When did it take place.
A. November 18th., 1914.
3 Q. In what City and State?
m A. Baltimore, Maryland.
4 Q. Do you know the Minister that married them?
A. Yes; I do.
5 Q. Was he a Regularly Ordained Minister of the Gospel?
A. He was.
6 Q. Are these folks living together now?
A. No sir.
7 Q. Which left the other?

Carrie Gross.

A. He left her.

8 Q. When?

A. The early part of the Spring of 1918.

9 Q. Do you remember what month it was?

A. It was about the month of April.

10 Q. Were you present around there when he was going out?

A. Yes; I visited the house three and four times a week.

11 Q. Will you state the circumstances of his leaving his wife?

A. He treated her very uncouth; specially in the presence of her family and friends.

12 Q. Do you know why he left?

A. Well, he was infatuated with another woman in East Baltimore.

13 Q. And what did he take with her when he left?

A. He just took part of his things at first, until eventually from time to time taking his things he had most everything out of there, and then finally he sent a wagon after his trunk.

14 Q. When was that; do you know - about.

A. That was about the first of April until the middle of April, that he took part of his things,

Carrie Gross.

and about the fifteenth of April he got the balance of his things, because I was there the day that ~~xxx~~ he got the good out.

15 Q. You were there?

A. Yes; when he took part of his things.

16 Q. Have you had a talk with him at any time?

A. Yes; I have.

17 Q. Did he say that he would or would not live with his wife any more?

A. He said that he would not live with her any more.

18 Q. How did she treat her husband?

A. Always a devoted wife.

19 Q. Was her conduct above reproach in all respects?

A. Yes.

20 Q. Did she give him any reason or cause for deserting her?

A. No sir.

21 Q. Have they both been residents of Baltimore City, State of Maryland, for more than two years prior to the filing of this suit?

A. Yes.

22 Q. And have they been separated for more than three years prior to the filing of this suit?

A. Yes.

Carrie Gross.

23 Q. Was his going away his own deliberate and final act?

A. It certainly was.

24 Q. Is there any hope or expectation of a reconciliation or of them living together any more?

A. No sir.

25 Q. Are there any children as the result of this marriage?

A. One little girl.

26 Q. What is the name?

A. Marjorie.

27 Q. How old?

A. Five years old.

28 Q. Who in your opinion is the fit and proper party to have ~~the~~ care and custody of the child?

A. The mother.

29 Q. And if awarded the same, do you think that she is the fit and proper party to have -- If awarded the same do you think that she will do a mother's part by the child?

A. I certainly do.

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
Leanne Gross

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 20 day of April in the year of Our Lord nineteen hundred and twenty-two at the City of Baltimore, in the State of Maryland.

A. de Russey Sappington (SEAL).
Examiner.

There are two..... 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 both of which I was employed by the Plaintiff....., and on none by the Defendant.....

A. de Russey Sappington
Examiner.

125
1922

Cir. Ct. No. 2.

316
Docket No.

MARY WOODYARD

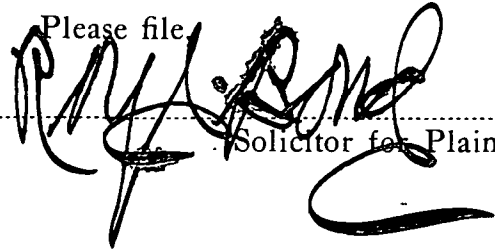
VS.

URIAH WOODYARD.

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file.



Solicitor for Plaintiff.

No. 21367B.

Filed 22 April 1922

MARY A. WOODYARD

URIAH vs. WOODYARD.

In the Circuit Court No. 2 Of Baltimore City.

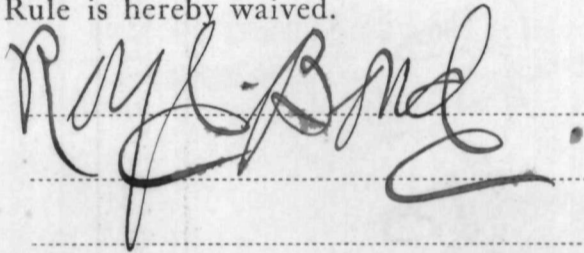
TERM 192.....

To the Honorable

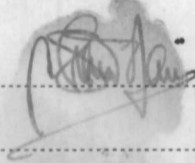
The

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

125 B Docket No. 31
192 2

Woodyard
vs.

Woodyard

Order of Reference
and Report

Root

No. 21367 B
7 ✓

Order Filed 22 day of April 192 2
Report Filed 17 day of May 192 2

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

Mary G Woodyard
vs.

Ursula Woodyard.

March

~~Term~~ 1922

This case being submitted, without argument, it is ordered by the Court, this *22*
day of *April*, 192*2*, that the same be and it is hereby referred to
Alexander W. Robertson, Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.

Charles F. Steen

Report of Auditor and Master

Bill filed by wife against husband for divorce a vinculo matrimonii on ground of abandonment for three years, Code Art. 16, Sect. 36. Defendant summoned and answers. Proof shows marriage, residence and abandonment by defendant for at least three years, continuous, deliberate, final and without hope of reconciliation. Minor child, Marjorie Woodyard, should be awarded plaintiff. Defendant should pay plaintiff the sum of six dollars a week, through the Prisoners' Aid Society, toward the support and maintenance of said minor child. Case submitted and ready for decree.

Alex W. Robertson
Auditor & Master.

Circuit Court No. 2

B ¹²⁵ 1922 No. 31 Docket

MARY A. WOODYARD

vs.

URIAH WOODYARD

pd
DECREE OF DIVORCE

17 May 1922

R
No. 21367. B

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Copied (2) - copied 2

Filed *17 May*, 1922

IN THE

MARY A. WOODYARD

Circuit Court No. 2

vs.

OF

BALTIMORE CITY.

URIAH WOODYARD

May TERM, 192 2

This is a proper decree.

Auditor & Master.

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

It is thereupon, this 17th day of May, Anno Domini, one thousand nine hundred and twenty-two by the Circuit Court No. 2

OF BALTIMORE CITY, Adjudged, Ordered and Decreed, that the said MARY A. WOODYARD

the above named complainant be, and she is hereby DIVORCED A VINCULO MATRIMONII, from the defendant. URIAH WOODYARD; that the minor child, Marjorie Woodyard, be awarded the plaintiff, and that the defendant pay the plaintiff, through the Prisoners' Aid Society, the sum of six dollars a week toward the support and maintenance of said minor child.

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

Charles J. Shen

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 192