

B 487
1919

IN THE CIRCUIT COURT
NO. 2
BALTIMORE CITY.

Milton Q. Dorsey

VS.

Josephine M. Dorsey.

Bill for divorce,
A VINCULO MATRIMONII.

No 18,665 B

Mr. Clerk: ----

Please file &c.,

Ray Bond
Solicitor for Plaintiff
215 St. Paul Place.

Id. 15th December 1919

Milton Q. Dorsey

VS.

Josephine M. Dorsey.

IN THE CIRCUIT COURT
NO. 2
BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully says:

FIRST: That the parties hereto were married in Asbury Park, New Jersey, on or about the 1st day of September 1914, and lived together as man and wife until on or about the 25th day of March 1916.

SECOND: 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.

THIRD: That though the conduct of your Orator towards his said wife, has been kind, affectionate and above reproach, she without any just cause or reason, abandoned and deserted him and has declared her intentions to live with him no more; that such abandonment has continued uninterruptedly for more than three years, was deliberate and final and the separation of the parties is beyond any reasonable hope or expectation of a reconciliation.

FOURTH: That there are no children as the result of said marriage.

WHEREFORE YOUR ORATOR PRAYS:

-a- A divorce, A Vinculo Matrimonii,
from the defendant.

-b- Such other and further relief as the
cas may require.

May it please your Honor, to grant unto your Orator, the writ of subpoena, directed unto the said defendant, commanding her to be and appear in this Court, in person or solicitor, on some day certain to be therein named, and perform such decree, as may be passed in the premises.

As in duty bound, he will ever pray,

Raymond

Solicitor for Plaintiff.

379 LK

Ct. Ct. No. 2

487
1919 *B* Docket No. 28

Dorsey

vs.

Dorsey

Subpoena to Answer Bill of Complaint

Put

No. *18665 B*

2

Copy = copied

Filed *12* January, 1919

Ray D. Bond

Solicitor.

SP4488 B

*Howe & Thomas J. McHully
Attorneys*

EQUITY SUBPOENA
The State of Maryland

To

Joseph M. Dorsey

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 *January*, 19*19*, to answer the complaint of

Milton L. Dorsey

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

WITNESS, the Honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *10th* day of *November*, 191*9*

Issued the *15th* day of *December*, in the year 191*9*

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

487

1919

B

Docket No.

28

Dorsey
vs.
Dorsey

Subpoena to Answer Bill of Complaint

Copy

No.

Filed, 191

Solicitor.

EQUITY SUBPOENA
The State of Maryland

To



Joseph M. Dorsey

of Baltimore City, Greeting:

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Milton L. Dorsey

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

WITNESS, the Honorable MORRIS A. SOBER, Chief Judge of the Supreme Bench of Baltimore City, the *10th* day of *November*, 191*9*

Issued the *15th* day of *December*, in the year 191*9*

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.”

John Pleasant
CLERK.

B487/1919

In event Court
at
Baltimore City

Milton Dorsey

vs

Josephine Dorsey

Answer of
Bill for Divorce
a Vinculo

Mr Clerk please
file

(~~to~~) Jans

No 18665. B

3

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BALTIMORE, MD.

Ed 27th Decem 1919

Milton Q. Dorsey

In The Circuit Court No. 2

VS.

of

Josephine Dorsey

Baltimore City.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the bill of complaint filed by the plaintiff in the above statement for a divorce

A Vinculo Matrimonii respectfully says:

FIRST: Your respondent admits the first, second and fourth paragraphs of the plaintiff bill.

SECOND: That your respondent neither admits nor denies the allegations as contained in the third paragraph of the plaintiff bill and insists on the strictest legal proof thereof.

THIRD: Your respondent further in answer says that she is a poor woman, unable to provide for her maintenance and support and that she has no money with which to meet the burden of cost, which was brought upon her by reason of the filing of the bill of complaint. That the plaintiff is a man of means and that he is steadily employed as a Public School teacher in the city of Baltimore, at a monthly salary of about one hundred dollars(100). That your Respondent is advised by Counsel that she is entitled to have an order passed by this Honorable Court to award her a certain sum as alimony during the progress of this suit, and a further sum to compensate her solicitor for his services in the same and that she might be prepared to meet the issue and prove the utter untruthfulness of the charge with which she has been so falsely and unjustly charged.

WHEREFORE YOUR RESPONDENT PRAYS:

a-That an order be passed allowing her Alimony,
Pendente Lite, and Counsel fee in such sums as this
Honorable Court may think just and proper.

-b-Such other and further releif as the case may
require.

As in duty bound she will ever pray,

Josephine Dorsey

Defendant.

(John) Davis

Solicitor for Defendant.

State of Maryland)
Baltimore City) to wit)
)

I hereby certify that on this ^{24th} day of Dec-
ember before me the subscriber, a Notary Public, of the State
of Maryland, in and for Baltimore City, personally appear-
ed Josephine Dorsey, the petitioner, in the fore-going
proceedings, and made oath in due form of law, that the
matter therein contained, is true to the best of her know-
ledge and beleif.

As witness my hand and Notarial Seal.

Carlos C. Jennings

Notary Public.

Same as
Joseph M. Dorsey

LL
B Docket 487
1919

CIRCUIT COURT No. 2

Dorsey

vs.

Dorsey

Order Counsel Fee and Alimony.

Pendente Lite
Husband Plaintiff

ORDER 29th December 1919

No. 18665 B.

(4.)

Copy - copied

Filed 29th December 1919

J. Steward Davis Solicitor

4.P. 3473 B. 4

Thomas J. McNeely.
Sheriff.

Non Est

5

CIRCUIT COURT No. 2

OR

WINDSOR CITY

WINDSOR CITY

copy - copied

Milton Q. Dorsey

IN THE
CIRCUIT COURT No 2

vs.

Josephine Dorsey

OF

BALTIMORE CITY

Spencerly

TERM, 1919

ORDERED BY THE COURT, this 29th day of December 1919

that the Plaintiff Milton Q. Dorsey

pay to the Defendant Josephine Dorsey

the sum of Fifteen Dollars as Counsel Fee for the

Solicitor of the Defendant, and that he further pay the sum of ten

Dollars per week, during the continuance of this suit, to the said Defendant.

Josephine Dorsey

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 13th

day of January 1920, provided a copy of this Order be served on the said Plaintiff

on or before the 3rd

day of January 1920

John P. Dolber

TRUE COPY—TEST:

\$100. per week

Clerk.

B

Docket

484
1919

CIRCUIT COURT No. 2

Jorsey

vs.

Jorsey

Order Counsel Fee and Alimony.

Pendente Lite

Husband Plaintiff

ORDER

No.

Copy
()

B.

Filed

191

Milton Q. Dorsey
vs.
Josephine Dorsey

IN THE
CIRCUIT COURT No 2

OF

BALTIMORE CITY

November TERM, 1919

ORDERED BY THE COURT, this 29th day of December 1919

that the Plaintiff Milton Q. Dorsey
pay to the Defendant Josephine Dorsey
the sum of Fifteen Dollars as Counsel Fee for the
Solicitor of the Defendant, and that he further pay the sum of ten

Dollars per week, during the continuance of this suit, to the said Defendant.

Josephine Dorsey

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 13th

day of January 1920, provided a copy of this Order be served on the said Plaintiff

on or before the 3rd

day of January 1920

John J. Sobler

TRUE COPY—TEST:

John Pleasant

Clerk.

Cir. Ct. No. 2.

487
1919

B

Docket No. 28

Milton O. Dorsey

vs.

Josephine Dorsey

GENERAL REPLICATION

Mr. Clerk:

Please file.

Ray Bond

Solicitor for Plaintiff.

NO. 18665B
5

Filed 13th January 1921

Milton D. Dorsey

In the CIRCUIT COURT, No. 2
of Baltimore City

vs.

Josephine Dorsey

January

TERM

1928

To the Honorable

The

Judge of Said Court:

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

Josephine Dorsey the defendant
in the above entitled cause in

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

Roy Bond

Solicitor for Plaintiff.

Circuit Court No 2.

487
1919

B

Docket

28

Milton O. Dorsey

vs.

Josephine Dorsey

prob
Petition for Leave to Take
Testimony and Order of
Court Thereon.

Order 13th January 1920

No.

18665 B

6

Filed

13 January

1920

Milton A. Dorsey

vs.

Josephine M. Dorsey

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

Milton A. Dorsey

the Plaintiff

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

Roy Bond
Solicitor for Plaintiff

ORDERED, this 13th day of January, 1920, 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.

Walter S. Denton

Doc. *B*

487
1919.

In the Circuit Court, #2
OF BALTIMORE CITY

DEPOSITIONS

Milton Q. Dorsey,

vs.

Josephine M. Dorsey

No. *18665 B.*

7

PLAINTIFF'S COSTS

Examiners..... \$ *—*

Copies.....

Sheriff.....

Stenographer.....

\$ _____

DEFENDANT'S COSTS

Examiners..... \$ _____

Copies.....

Sheriff.....

Stenographer.....

\$ _____

Ed. 11th February 1920

Milton W. Dorsey

vs.

Josephine M. Dorsey

In the Circuit Court # 5

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
13 day of January 1920, met on
the 4 day of February in the year nineteen
hundred and twenty at my office, in the City of Baltimore, in the State
of Maryland, and assigned the 6 day of February
in the same year at 4:5 o'clock in the after-noon and the
office of Ray S. Bond, Esq. S. J. 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:—

Dorsey,

v.

Dorsey.

Testimony taken at the office of Roy S. Bond, Esq.,
215 Courtland Street, Baltimore, Maryland, February 6th.,
1920 at 5 O'clock P. M.

Milton Q. Dorsey, the Plaintiff in this case,
produced on his own behalf, 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. Milton Q. Dorsey, 1319 Upton Street; teacher.
2 Q. Do you know the parties to this suit?
A. I am the Plaintiff and my wife is the De-
fendant.

BY MR. BOND.

- 1 Q. When, where and by whom were you married?
A. I was married September 1st. , 1914, at Asbury Park
New Jersey, by the Reverend Mr. Crismas.
2 Q. Was the Reverend Mr. Crismas a Regular Ordained
Minister of the Gospel?
A. Yes.
4 Q. Of what Faith?
A. The A. M. E. Church.

Milton Q. Dorsey.

- 4 Q. The African M. E. Church?
- A. Yes.
- 5 Q. Are you living with your wife now?
- A. No sir.
- 6 Q. When were you separated, sir?
- A. March 25th., 1916.
- 7 Q. Did you leave her or did she leave you?
- A. She left me.
- 8 Q. Now, where were you living, Mr. Dorsey, when your wife left you?
- A. 1411 Druid Hill Avenue.
- 9 Q. In what City and State?
- A. Maryland,- Baltimore, Maryland.
- 10 Q. How long have you been a resident of Baltimore City, State of Maryland?
- A. All my life.
- 11 Q. How long has she been a resident?
- A. All her life.
- 12 Q. Do you mean to tell us that you and your wife both have been residents of Baltimore City, State of Maryland for a period of more than two years prior to the time this divorce case was started?
- A. I do.
- 13 Q. Will you tell us how you treated your wife when you all were aliving together as husband and wife.

Milton Q. Dorsey.

A. I treated her as a dutiful , affectionate and supporting husband.

14 Q. Were you always a good, kind, affectionate and true husband towards your wife?

A. Yes.

15 Q. You say that you were a good supporting husband; tell us what you mean by that?

A. I did everything that I could for her and looked after her Welfare.

16 Q. Did you provide for her support?

A. I did.

17 Q. And her clothes?

A. Yes.

18 Q. Did she ever have any reason to complain?

A. No reason whatever.

19 Q. Were you teaching in the Public School system at that time?

A. Yes.

20 Q. And have you been teaching the same system since?

A. Yes.

21 Q. Was your conduct above reproach in all particulars

A. It was.

22 Q. Now, recite for us, if you please, the circumstances surrounding the separation. What did she do, and what did you do. What was the cause of the separation.

Milton Q. Dorsey.

A. Well, on numerous occasions before, she showed evidence of frantic jealousy without any cause whatsoever, because at the time I was Superintendent of the Sharp Street Sunday School, and was living above reproach, and her reason for her maner, - there was'nt any cause. I had trouble in getting my meals and half the time would not have any companionship at home, and there did not seem to be any sympathy at all in my work or in the School or in the Church, and around about March 25th., 1916, she got into one of these fits and just left without any reason at all; she packed her trunk and said that she was going and she did go.

23 Q. Did she say that she would never be back?

A. Yes.

24 Q. Has she ever been back?

A. No sir.

25 Q. Have you ever lived or cohabited with your wife since the separation?

A. I have not.

26 Q. Has this separation continued uninterruptedly for a period of more than three years prior to the time this divorce case was started?

A. It has.

27 Q. Is there any hope or expectation of a reconciliation between you or any hope of you ever living

Milton Q. Dorsey.

ciliation between you or any hope of you ever living with her any more?

A. It is not.

29 Q. Were there any children born as the result of this marriage?

A. No sir.

29 Q. What has been your conduct both before and since the separation; have you been a perfect gentleman in all particulars?

A. I have.

31 Q. Were you always a good, kind, affectionate and true husband towards your wife?

A. I was.

31 Q. Did you give her any cause whatsoever for jealousy and for deserting and leaving you on the 25th., of March 1916 or at any other time?

A. None whatsoever.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the 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.

A. ---

Wm
Milton Q. Dorsey

WILLIAM E. KEY, 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. William E. Keys, 402 West Hoffman Street; waiter.

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

A. I do.

BY MR. BOND:

1 Q. Mr. Dorsey has alleged, Mr. Key, that he was married in Asbury Park, New Jersey, about the 1st., of September 1914; is that correct?

A. It is.

2 Q. Do you remember when the parties to this suit lived and cohabited together as husband and wife?

A. I do.

2 Q. Do you remember when Mr. Dorsey introduced his wife into society as his wife?

A. I do.

3 Q. They were married and went around as such, did they not?

A. Yes.

5 Q. Are they living together now?

A. No sir.

6 Q. Mr. Dorsey alleges that they were separated on the 25th., March 1916, is that right?

A. Yes.

William E. Key.

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

A. She left him.

8 Q. Mr. Key, will you tell us if you had occasion to visit the home of Mr. and Mrs. Dorsey at 1411 Druid Hill Avenue?

A. I did quite often.

10 Q. Does anybody, or did anybody at that time live there who is related to you, and if so, who?

A. My mother.

11 Q. Then they lived with your mother?

A. They did.

12 Q. And you had occasion to visit your mother quite frequently every day and night?

A. Quite frequently;- almost every day and night.

13 Q. Now, how long di your knowledge, Mr. Key, have the parties to this suit been residents of Baltimore City, State of Maryland?

A. All their lives to my knowledge.

14 Q. Then they have been residents of the City and State for a period of more than two years prior to the filing of this suit?

A. Yes; they have.

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

A. She left him.

William E. Key.

16 Q. Would you kindly tell us how he treated his wife? You visited them, and had a pretty good chance to glean how things were going. How did he treat his wife?

A. He treated her as a dutiful husband; he kept reasonable hours, and departed himself good, and he was dutiful with regard to a husband's duties.

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

A. She left him.

18 Q. Has this separation continued uninterruptedly for a period of more than three years prior to the time this divorce case was started?

A. It has.

20 Q. Has this separation continued -- Was he always a good kind, affectionate and true husband towards his wife?

A. He was.

21 Q. Did he give her any cause whatsoever for leaving him or for so jealously deserting and abandoning him?

A. He did not.

22 Q. Was her going deliberate and final; -- that is to say, was she forced away or did she go of her own accord?

A. No; she was not forced away by his treatment.

William E. Keys.

23 Q. Then do you mean to tell us that her going was her own deliberate and final act?

A. It was her own act.

24 Q. And his treatment was good?

A. It was. He was a dutiful husband.

25 Q. Is there any hope or expectation of a reconciliation between these parties?

A. Never.

26 Q. Were there any children born of this marriage?

A. There was not.

27 Q. Now, tell us please, Mr. Key, in your own way of her going; that is, the facts surrounding the separation?

A. Well, as far as I know, she went on her own accord. Her husband would be at work, and he would come home and at times when I would be there his meals would not be ready, and she would be out, and I know that he was a dutiful husband with regards to a husband's duties; every week her allowance was there. Of course she had to go and get it where he worked, and sometimes he would return to his meals and they would not be ready, and there would be a controversy with regard to her neglect of her part of the business.

William B. Keys.

28 Q. Did he continue to live at 1411 Druid Hill Avenue after she had been gone for sometime.

A. Yes; for sometime.

29 Q. Did she come back to live with him any more.

A. She did not.

30 Q. Has she by her acts declared her intention never to live with him any more?

A. She has.

32 Q. Was Mr. Dorsey always a kind, affectionate and true husband towards his wife?

A. He was.

32 Q. This separation took place at the house of your mother?

A. Yes; on Druid hill Avenue, and that is how I know that she left him.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the 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.

A.---

William Edw. Key.

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 11th day of February in the year of Our Lord nineteen hundred and twenty at the City of Baltimore, in the State of Maryland.

A. de Russy Sappington (SEAL).
Examiner.

There are no 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 each of which I was employed by the Plaintiff....., and on none by the Defendant.....

A. de Russy Sappington
Examiner.

487

Cir. Ct. No. 2.

1919

Docket No. _____

Milton A. Dorsey

vs.

Josephine Dorsey

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file.

Raymond

Solicitor for Plaintiff.

No.

18665.B.

- 8.

Filed

12th February

1919

Milton Q Dorsey
Josephine ^{vs.} Dorsey

In the Circuit Court No. 2
Of Baltimore City.

January TERM 191 20
The

To the Honorable

Judge of Said Court:

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

Raymond

Solicitor for Plaintiff,

(P. J. Davis)

Solicitor for Defendant.

St. Ct. No. 2

487
1919

28 Docket No. B

Dorsey

VS.

Dorsey

Order of Reference

13th February 1920
and Report

Roberts

No. 18665 B.

9-10 ✓

Order Filed 13th day of February 1920

Report Filed 3rd day of March 1920

Milton L Dorsey

VS.

IN THE
Circuit Court No. 2

OF
BALTIMORE CITY

Josephine Dorsey

January Term, 1911

This case being submitted, without argument, it is ordered by the Court, this 13th day of February, 1911, that the same be and it is hereby referred to Alexander Robertson, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

John H. DORSEY

Report of Auditor and Master

Bill filed by husband against wife for a divorce *à vinculo matrimonii* for abandonment for three years Code Art. 16-5-26 Defendant answers by Solicitor under oath. Bill shows marriage residence and abandonment for three years continuous deliberate and without hope of reconciliation Submitted and ready for decree
Alex Robertson
Auditor and Master

Circuit Court No. 2

B

487

1919

No. 28

Docket

MILTON Q. DORSEY

VS.

JOSEPHINE M. DORSEY.

DECREE OF DIVORCE.

6 March 1929

No. 18665-B

11
Copies - copied

Filed

6 March

, 1929

This is a proper decree.

Ray M. Rubenstein
Auditor and Master.

MILTON Q. DORSEY

vs.

JOSEPHINE M. DORSEY

IN THE

Circuit Court No. 2

OF

BALTIMORE CITY.

January Term, 19*20*

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 *March* Anno Domini, one thousand nine hundred and *twenty* by the CIRCUIT COURT No. 2 OF BALTIMORE CITY, *Adjudged, Ordered and Decreed*, that the said *Milton Q. Dorsey*,

the above named complainant be, and he is hereby DIVORCED A VINCULO MATRIMONII, from the defendant. *Josephine M. Dorsey.*

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

Walter J. Dawkins.

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 _____ 19*20*