

In The Court of
of Baltimore City 7755-
Baltimore City 1920

Belle Brown

5

Wagon Brown

Belle June G. Senculo

Mr Clerk please file

(Belle June)

B 21954

(1) (2)

DAVIS & BISHOP
ATTORNEYS AT LAW

118 E. LEXINGTON STREET
BALTIMORE, MD.

sd 17 Dec 1920

Bettie Brown

In The Circuit Court

Vs.

of

Waymon Brown

Baltimore City.

To The Honorable, The Judge of Said Court:

Your Oratrix, complaining, respectfully says:

FIRST, That the parties hereto were married the 12th. day of June, 1912 by Rev. Bedford, a Methodist minister and lived together as man and wife until on or about June 13th. 1912. Said marriage occurred in Baltimore, State of Maryland.

SECOND, That Your Oratrix is a resident of the city of Baltimore, State of Maryland, and has been for more than two years prior to the filing of this bill of complaint. That the respondent is a non-resident of the city of Baltimore and when last heard of was in Chester Pennsylvania.

THIRD, That though the conduct of your Oratrix towards her husband has always been kind, affectionate and above reproach, the respondent without any just cause or reason abandoned your Oratrix. And has declared his intention to live with her no longer. That the said abandonment has continued uninterruptedly for more than three years prior to the filing of this bill of complaint and that the separation of the parties is beyond any reasonable hope or expectation of reconciliation.

FOURTH, That Your Oratrix has never condoned said offense.

FIFTH, That there is one child as a result of said marriage, Waymon Jr. eight years old.

WHEREFORE YOUR ORATRIX PRAYS:

a-a A divorce a vinculo matrimonii from the respondent.

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

c-c That a decree be passed, divorcing Your Ora-

trix from the respondent, a vinculo matrimonii.

May it please Your Honor, to grant unto Your Oratrix, an order of publication, setting forth the nature and substance of this bill and warning the said defendant to be in this court in person or appear by solicitor on or before a certain day to be therein named and show cause, if any she may have why a decree should not be passed as prayed.

Bettie Brown.

(P. *Paul Jans*
attorney for petitioner)

Davis & Bishop, Solicitors,

118 E. Lexington St.

In The Circuit Court of Baltimore City.

Bettie Brown vs. Waymon Brown.

ORDER OF PUBLICATION.

The object of this suit is to procure a decree for a divorce A VINCULO MATRIMONNII, by the plaintiff from the defendant.

The Bill states that the parties thereto were married in Baltimore City, State of Maryland, the 12th. day of June, 1912 by Rev. Bedford, a Methodist minister and lived together as man and wife until on or about June 13th. 1912. That Your Oratrix is a resident of the city of Baltimore, State of Maryland, and has been for more than two years prior to the filing of this bill of complaint. That the respondent is a non-resident of the city of Baltimore and when last heard of was in Chester Pennsylvania. That though the conduct of your Oratrix towards her husband has always been kind, affectionate and above reproach, the respondent without any just cause or reason abandoned your Oratrix and has declared his intention to live with her no longer. That the said abandonment has continued uninterruptedly for more than three years prior to the filing of this bill of complaint and that the separation of the parties is beyond any reasonable hope or expectation of reconciliation. That there is one child born as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City ordered this ¹⁷ day of ^{December} 1920. That the plaintiff by causing a copy of this order to be inserted in some daily newspaper, published in the city of Baltimore, once a week for four successive weeks, before the ¹⁹ day of ^{January} 1921 and give notice to the said defendant, Waymon Brown (now absent) of the object and substance of this bill

and warning him to be and appear in this court in person or by solicitor, on or before the ^{5 February} day, 1920, to show cause if any he may have, why a decree should not be passed as prayed.

Robert F. Stanton

775
192 0 *pleo* Docket No.

Brown

vs.

Brown

Certificate of Publication

B 21954
3

THE DAILY RECORD.

Filed *8* day of *July* 192 *1*

THE DAILY RECORD

8-7

Fourth Insertion.

Davis & Bishop, Solicitors,
118 E. Lexington St.

IN THE CIRCUIT COURT OF BALTI-
MORE CITY — (B-775-1920) — Bettie
Brown vs. Waymon Brown.

ORDER OF PUBLICATION.

The object of this suit is to procure a decree for a divorce a vinculo matrimonii, by the plaintiff from the defendant.

The bill states that the parties thereto were married in Baltimore City, State of Maryland, the 12th day of June, 1912, by Rev. Bedford, a Methodist minister, and lived together as man and wife until on or about June 13th, 1912. That your oratrix is a resident of the City of Baltimore, State of Maryland, and has been for more than two years prior to the filing of this bill of complaint. That the respondent is a non-resident of the City of Baltimore and when last heard of was in Chester, Pennsylvania. That though the conduct of your oratrix towards her husband has always been kind, affectionate and above reproach, the respondent without any just cause or reason abandoned your oratrix and has declared his intention to live with her no longer. That the said abandonment has continued uninterruptedly for more than three years prior to the filing of this bill of complaint and that the separation of the parties is beyond any reasonable hope or expectation of reconciliation. That there is one child born as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City ordered this 17th day of December, 1920, that the plaintiff by causing a copy of this order to be inserted in some daily newspaper, published in the City of Baltimore, once a week for four successive weeks, before the 19th day of January, 1921, and give notice to the said defendant, Waymon Brown (now absent), of the object and substance of this bill and warning him to be and appear in this Court, in person or by solicitor, on or before the 5th day of February, 1921, to show cause, if any he may have, why a decree should not be passed as prayed.

ROBERT F. STANTON.

True copy—Test:

CHAS. R. WHITEFORD,

d20,27ja3,10

Clerk.

Baltimore, JAN 10 1921, 192

We hereby certify that the annexed advertise-
ment of Order Publication Circuit Court

of Baltimore City, Case of
Bettie Brown
vs. Waymon Brown

was published in THE DAILY RECORD, a daily
newspaper published in the City of Baltimore, once in
each of Four successive weeks before the

19th day of January, 1921
First insertion December 20th, 1920

THE DAILY RECORD.

Per Shaddeus W. Crapster

775
1920

Bles
Docket

Ct. Ct.

Bette Brown

vs.

Wayman Brown

Decree Pro Confesso.

B 2 1954

No. 4

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Filed

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1921

Beebe Brown

vs.

Wayman Brown

IN THE
Circuit Court
OF
BALTIMORE CITY.

January

Term, 1921

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 8th day of February in the year nineteen hundred and twenty one 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 said 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 H. Heister

STATE OF MARYLAND,

BALTIMORE CITY, SCT :

I hereby certify that on this 2nd day of February 1921 before me, the subscriber, a Notary Public, of the State of Maryland, in and for the City aforesaid, personally appeared Beebe Brown and made oath in due form of law that her (~~his~~) husband (~~wife~~) the defendant in the above entitled case is not in the Military or Naval service of the United States Government, to the best of her (~~his~~) knowledge, information and belief.

As Witness my hand and Notarial Seal.

Arthur N. Royer
Notary Public.

Bette Brown.



Doc. B 775
1920

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Bettie Brown

vs.

Wagnan Brown

No. 2 1954 B

PLAINTIFF'S COSTS

Examiners \$

Copies

Sheriff

Stenographer

\$ _____

DEFENDANT'S COSTS

Examiners \$

Copies

Sheriff

Stenographer

\$ _____

fd 18 March 1921

Bettie Brown

.....

vs.

Waymon Brown

.....

In the Circuit Court
OF BALTIMORE CITY.

Secre Pro Confess 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
ninth day of February 1921, met on
the ninth day of February in the year nineteen
hundred and twenty-one at my office, in the City of Baltimore, in the State
of Maryland, and assigned the tenth day of February
in the same year at three o'clock in the afternoon and the
office of J. Stewart Davis, 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:—

8-1 B.

Brown,

v.

Brown.

Testimony taken at the office of Messrs Bishop and Davis, East Pleasant Street, Baltimore, Maryland, March 10th., 1921, at 3 O'clock P. M.

BETTIE BROWN, 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. Bettie Brown, 1524 Ashland Avenue; service.
- 2 Q. Do you know the parties to this suit?
A. I am the Plaintiff and my husband is the Defendant.

BY MR. BOND:

- 1 Q. State when you were married?
A. June 12th.
- 2 Q. 1912?
A. Yes.
- 3 Q. By whom?
A. The Reverend Mr. Bedford.
- 4 Q. A Methodist Minister?
A. Yes.
- 5 Q. And you lived together as husband and wife until when - June 13th., 1912.

Bettie Brown

A. Yes.

6 Q. You were married for a day before you separated?

A. Yes.

7 Q. And you were married in Baltimore City,
State of Maryland?

A. Yes.

8 Q. Have you been a resident of Baltimore City,
State of Maryland, for at least two years prior to
the filing of this suit?

A. Yes.

9 Q. And your husband is a non-resident of the
State of Maryland, is he?

A. Yes.

10 Q. He was last heard of where?

A. In Pennsylvania; that is the last that I
heard of him.

11 Q. In what City in Pennsylvania?

A. Chester, Pennsylvania.

12 Q. Was your conduct above reproach?

A. Yes.

13 Q. You did not give him any cause or reason to
leave you

A. No sir.

Bettie Brown.

14 Q. Since he has abandoned and deserted you, has he declared his intention of not living with you any longer?

A. Yes.

15 Q. Has his said abandonment of you been continuous and uninterrupted for more than three years prior to the filing of this Bill of Complaint?

A. Yes.

16 Q. And this separation: He left you, did he?

A. Yes; he left me.

17 Q. What did he say when he left you.

A. When he came there the day after I was married, I asked him whether he was going to live with me, and he said "We were made to get married, but you can not make me live with you", and he supported the child until it was six months old, and he has not supported us since.

18 Q. How old is the child now?

A. Eight years old.

19 Q. Is there any chance of your making up?

A. No sir.

20 Q. You have not lived or cohabited with him since the desertion?

A. No sir.

Bettie Brown.

21 Q. Do you want the care and custody of the child?

A. Yes.

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

Bettie Brown

SARAH MORTON, 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. Sarah Morton, 1524 Ashland Avenue; service.
2 Q. Do you know the parties to this suit?
A. Yes.

BY MR. BOND:

- 1 Q. Were you present at the wedding?
A. Yes.
2 Q. You know that they were married?
A. Yes.
3 Q. June 12th.
A. Yes.
4 Q. 1912?
A. Yes.
5 Q. Do you know the Minister's name?
A. Yes.
6 Q. What is his name?
A. Bedford.
7 Q. Methodist Minister.
A. Yes.
9 Q. What caused the separation, and which left the other?

Sarah Morton.

A. He left her.

9 Q. When did he leave her?

A. He left her the next day,- June 13th., 1912.

10 Q. Have you ever seen him since he left her?

A. I have seen him once.

11 Q. You saw him once?

A. Yes.

12 Q. Did he mention or say anything about the
desertion,- about living with her or about leaving her.

A. He told me that he did not have any wife.

13 Q. They were married in Baltimore City,
State of Maryland?

A. Yes.

14 Q. Has the Plaintiff been a resident of Baltimore
City, State of Maryland, for at least two years
prior to the filing of this suit?

A. Yes.

15 Q. The Defendant,- He is a non-resident of the
State of Maryland.

A. Yes.

16 Q. Where was he the last you heard of him?

A. I do not know where he is; I have not seen or
heard from him since I saw him last.

Sarah Morton.

17 Q. Have you heard some one else say that he was in Chester, Pennsylvania?

A. Yes.

18 Q. You heard others say that?

A. Yes.

19 Q. And the conduct of the Plaintiff towards her husband,- was she always kind, affectionate and was her conduct always above reproach?

A. Yes.

20 Q. Did she give him any cause to leave her?

A. No sir.

21 Q. Has he declared his intention never to live with her any more?

A. Yes.

22 Q. Has he said that he would not live with her any more?

A. Yes.

23 Q. Has this desertion of his wife by the Defendant been continuous and uninterrupted for more than three years prior to the filing of this Bill of Complaint

A. Yes.

24 Q. Is there any chance of their making up?

A. No sir.

25 Q. The Plaintiff has never cohabited with her husband since the desertion, now has she forgiven it,-

Sarah Morton.

has she.

A. No sir.

26 Q. Was there any children born as the result of this marriage?

A. Yes.

27 Q. Do you know his name.

A. Yes.

28 Q. What is his name?

A. Wayman.

29 Q. He is eight years old?

A. Yes.

30 Q. The Plaintiff has that child now?

A. Yes.

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.---

to

Sarah Morton

ESTELLA REDD, 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. Estella Redd, 1524 Ashland Avenue; service.
2 Q. Do you know the parties to this suit?
A. Yes.

BY MR. DAVIS:

- 1 Q. Were you present at the wedding?
A. Yes.
2 Q. You know that they were married?
A. Yes.
3 Q. When were they married?
A. June 12th.
4 Q. 1912?
A. Yes.
5 Q. By whom?
A. A Methodist Minister.
6 Q. And they separated when?
A. June 13th., 1912.
7 Q. And which left the other; did he leave her or did she leave him.
A. He left her.
8 Q. What did he say when he left her.
A. He did not say anything; I did not hear him

Estella Redd.

say anything; he just went away and never came back.

9 Q. He just went away and never came back?

A. Yes sir.

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

A. Yesz

11 Q. And is the Defendant a non-resident of the State of Maryland?

A. Yes.

12 Q. Where was he the last you heard of him?

A. Chester, Pennsylvania.

13 Q. And was the conduct of the Plaintiff towards her husband always kind, and affectionate and always above reproach?

A. Yes.

14 Q. Did she give her husband any just cause or reason to leave her?

A. No sir.

15 Q. Has he declared his intention never to live with her any more?

A. Yes.

16 Q. Has this abandonment continued uninterruptedly for atleast three years prior to the filing of this suit?

Estella Redd.

A. Yes.

17 Q. And is there any chance of a reconciliation; is there any chance of their making up.

A. No sir.

18 Q. Has the Plaintiff lived or cohabited with her husband since he abandoned her.

A. No sir.

19 Q. There is one child as the result of this marriage?

A. Yes; Wayman eight years old; she has the child.

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 Estella Redd

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 18 day of March in the year of Our Lord nineteen hundred and twenty-one 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 both of which I was employed by the Plaintiff....., and on none by the Defendant.....

A. de Russey Sappington
Examiner.

Circuit Court

795

19 20

Docket No.

Brown

vs.

Brown

Order of Reference
and Report

Robatson
B 2 1954

No.

(6) ✓

Order Filed 22 day of March 19 21

Report Filed day of 19 ..

Bettie Brown

Wayman Brown

vs.

IN THE
770
Circuit Court

OF

BALTIMORE CITY

March Term, 1921

22

This case being submitted, without argument, it is ordered by the Court, this day of March, 1921, that the same be and it is hereby referred to Alex Robertson, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Alex Robertson

Report of Auditor and Master

Bill filed by wife against husband for divorce A Vinculo Matrimonii for abandonment for three years and custody of minor child. Code Article 16, Section 36.

Order of publication against defendant as non-resident, no answer, decree Pro Confesso, thirty days elapsed. Proof shows marriage, residence of plaintiff, non-residence of defendant and abandonment for, at least, three years continuous, deliberate, final and without hope of reconciliation. The minor child to be awarded the plaintiff. Case ready for decree.

Alex Robertson

Auditor and Master.

CIRCUIT COURT

B 775
1920

No. Docket

Public Domain

VS.

Public Domain

89

Decree of Divorce

B 21954

B No.

7

fd 2 April 1921

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

Alex. Johnston

Auditor and Master.

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

.....Bettie Brown.....

VS.

.....Waymon Brown.....

.....March.....Term, 19.21.

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

It is thereupon, this Second day of April ~~Next~~, A. D. 1921, by the Circuit Court of Baltimore City, **Adjudged, Ordered and Decreed**, that the said

.....Bettie Brown.....
the above named Complainant be and she is hereby **DIVORCED A VINCULO MATRIMONII** from the Defendant, Waymon Brown; and that the minor child, Waymon Brown, Jr., be awarded the plaintiff.

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

Charles Henisler