

In Circuit Court
of Baltimore City 40
1920

Mary Campbell

vs

Fred Campbell

Bill for James G. Davis

Mr. Davis please file

~~(this)~~ Jan's
att'y

3205-29

(1) (2)

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BAaltimore, MD.

19 January 1920

Mary Campbell

In the Circuit Court

Vs.

of

Fred Campbell

Baltimore City.

To The Honorable, The Judge of Said Court:

Your Oratrix, complaining, respectfully says:

FIRST, That the parties hereto were married in Washington D.C., by Rev. Sherry a Baptist minister, on or about December II, 1899, and lived together as man and wife until on or about the 20th. day of November, 1914.

SECOND, That Your Oratrix is a resident of the city of Baltimore, state of Maryland, and has been formore than two years prior to the filing of this bill of Complaint. That the defendant is a non-resident of the city and state and when last heard of, was in Washington D.C.

THIRD, That though the conduct of Your Oratrix towards her husband has always been kind, affectionate, and above reproach, he, without any just cause or reason abandoned and deserted her, and has ~~abandoned~~, declared his intentions to live with her no longer; that such abandonment has continued uninterrupted for more than three years, prior to the filing of this Bill of Complaint; and was deliberate and final, and beyond any reasonable hope or expectation of reconciliation.

FOURTH, That Your Oratrix has never condoned nor forgiven the said desertion, that she has never co-habited with the said respondent since the desertion.

FIFTH, That there is one child, Beatrice twenty years old, living as the result of said marriage.

WhereFORE YOUR ORATRIX PRAYS:

- a- A divorce a vinculo matrimonii from the defendant.
- b- The care and custody of said minor child.
- c- Such other and further releif as the case may require.

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 he may have why a decree should not be passed as prayed.

As in duty bound etc.

Mary Campbell *per P.S.D.*
Complainant

John Jani
Solicitor for Complainant.

State of Maryland)
) To Wit
Baltimore City)

I hereby certify that on this 17th day of 1920, before me the subscriber, a Notary Public in and for Baltimore City, State of Maryland, personally appeared Mary Campbell, the complainant in the foregoing Bill and made oath in due form of law that the matter contained in the same was true to the best of her knowledge and beleif.

Carlos J. Jennings
Notary Public.

J. Steward Davis, solicitor

118 E. Lexington St.

In The Circuit Court of Baltimore City.

Mary Campbell Vs. Fred Campbell

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 Wash. D.C. on or about December 11/ 1899, and lived together as man and wife on or about November 20, 1914. That the plaintiff 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 defendant is a non-resident of this city and state, and when last heard of was in Washington D.C. that though the conduct of the plaintiff towards her husband was always kind and affectionate and above reproach; he, without just cause or reason, abandoned her and has declared his intentions not to live with her any longer; and that the abandonment has continued uninterrupted for more than three years prior to the filing of this bill of complaint; and the separation of the parties is beyond any reasonable hope or expectation of reconciliation. That there is one child, 20 years old.

It is thereupon by the Circuit Court of Baltimore City, ordered this ⁷ day of ^{January} 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 ^{February} 1920. and give notice to the said defendant, Fred Campbell (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 ⁶ day of ^{March} 1920. to show cause if any he may have, why a decree should not be passed as prayed.

Robert F. Stanton

40
1920

Blew
Docket No.

Mary Campbell

vs.

Fred Campbell

Certificate of Publication

B 20 5 29
(3)

THE DAILY RECORD.

Filed

13

day of

April 1920

THE DAILY RECORD

J. Steward Davis, Solicitor,
118 E. Lexington St.

IN THE CIRCUIT COURT OF BALTIMORE CITY—(B-40-1920)—Mary Campbell vs. Fred Campbell.

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 Washington, D. C., on or about December 11, 1899, and lived together as man and wife until on or about November 20, 1914. That the plaintiff 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 defendant is a non-resident of this city and State, and when last heard of was in Washington, D. C. That, though the conduct of the plaintiff towards her husband was always kind and affectionate and above reproach, he, without just cause or reason, abandoned her and has declared his intentions not to live with her any longer; and that the abandonment has continued uninterruptedly for more than three years prior to the filing of this bill of complaint; and the separation of the parties is beyond any reasonable hope or expectation of reconciliation. That there is one child, 20 years old.

It is thereupon by the Circuit Court of Baltimore City, ordered, this 19th day of January, 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 February, 1920, and give notice to the said defendant, Fred Campbell (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 6th day of March, 1920, 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,
Clerk.

Baltimore, FEB 10 1920, 192

We hereby certify that the annexed advertisement of Order Publication Circuit Court

of Baltimore City, Case of Mary Campbell
Fred Campbell
vs.

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 February, 1920
First insertion January 20th, 1920

THE DAILY RECORD.

Per

Shadwell W. Crapster

40

1910

Bled

Docket

Ct. Ct.

Mary Campbell

vs.

Fred Campbell

Decree Pro Confesso.

B 20529

No.

(4)

Carr

Filed

15 April

1910

IN THE
Circuit Court
OF
BALTIMORE CITY.

Mary Campbell
vs.

Fred Campbell

Jan March Term, 1920

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 15th day of April in the year nineteen hundred and twenty 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.

Robert F. Stanton

STATE OF MARYLAND,

BALTIMORE CITY, SCT :

I hereby certify that on this 15th day of April 19 20 before me, the subscriber, a Notary Public, of the State of Maryland, ~~in and for the City~~ aforesaid, personally appeared Mary Campbell and made oath in due form of law that her (~~hus~~) 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. Rogers
Notary Public.

+ Mary Campbell



Docket B. 40.1920

IN THE CIRCUIT COURT

Mary Campbell

vs

Fred Campbell

DEPOSITIONS

B No. 20529

(5) PLAINTIFF'S COSTS

Examiner \$ 8.00

Copies

Notices

Sheriff

Stenographer 2.00

\$ 10.00 Paid

DEFENDANT'S COSTS

Examiner \$

Copies

Notices

Sheriff

Stenographer

\$

ALFRED J. CARR, Examiner

Filed 28 day of April 1920

Mary Campbell

vs.

Fred Campbell

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, ALFRED J. CARR, 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 15th day of April 19 20, met on the 19th day of April in the year nineteen hundred and twenty at my office, in the City of Baltimore, in the State of Maryland, and assigned the 22nd day of April in the same year at 9.30 o'clock in the fore noon 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 deposition, that is to say:—

April 22nd, 1920.

MARY CAMPBELL, the Plaintiff, produced in her own behalf, being duly sworn, deposes and saith as follows:

BY THE EXAMINER:

1Q. State your name, residence and occupation.

A- Mrs. Mary Campbell, 907 S. Second Street, Canton, Baltimore, Maryland, and I do domestic and days work.

2Q. Who are the parties to this suit?

A- I am the Plaintiff, and Frederick Campbell is my husband.

BY MR. DAVIS:

3Q. When, where and by whom were you married?

A- On December 11th, 1899, in Washington, D. C., by the Reverend Cherry, of the Baptist Church.

4Q. Were any children born of this marriage?

A- One, my daughter, Beatrice, age twenty.

5Q. Where did you go to live after the marriage?

A- We lived in Washington a while, and then we moved to Baltimore, Maryland.

6Q. When did you come to Baltimore?

A- I have been in Baltimore five years.

7Q. Are you and your husband now living together?

A- No.

8Q. When did you separate and which one left the other?

A- My husband left me on November 20th, 1914.

Mary Campbell

9Q. Where were you living at the time that he left you?

A- In Washington, D. C.

10Q. What was your conduct and treatment towards your husband during the whole of your married life?

A- I was always kind and affectionate to him, and was a good wife to him and a good mother to my children. My conduct was always good and I was a faithful wife to him.

11Q. How did he treat you?

A- Very unkind. He was abusive to me, and did not half support me or provide for me, and he did not have a kind word for me, and was always dissatisfied with his home.

12Q. What caused him to abandon you on November 20th, 1914?

A- We had domestic troubles. It was his unbecoming conduct towards his daughter, and when I called him down for it he left me.

13Q. What did he say, if anything, at the time he left?

A- He said he was not going to live with me any more, and packed his suitcase and left.

14Q. Where did he go, if you know?

A- I do not know. The last I heard of him he was in Washington, D. C.

15Q. Have you ever heard of him or seen him since?

A- I have never heard of him or seen him since he left.

16Q. Is your husband now or was he on the 19th of January, 1920, a resident or a non-resident of the State of Maryland?

Mary Campbell

A- A non-resident of the State of Maryland.

17Q. Why do you say he is a non-resident of the State of Maryland?

A- The last time I heard of him he was in Washington, D.C.

18Q. When was the last time you heard of him being in Washington, D. C.

A- That has been a year ago.

19Q. Have you lived with or cohabited with him since he he left you under the circumstances you have described?

A- No.

20Q. Has the abandonment of you by your husband continued uninterruptedly for at least three years prior to January 19th, 1930?

A- Yes. We have been apart five years last November.

21Q. Was the abandonment of you by your husband his own deliberate and final act?

A- It was.

22Q. Is there any reasonable hope or expectation of a reconciliation?

A- No.

- - - - -

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 or 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 Mary Campbell*

GERTRUDE WASHINGTON, a witness produced on behalf of the Plaintiff, being duly sworn, deposeth and saith as follows:

BY THE EXAMINER:

1Q. State your name, residence and occupation, if any.

A- Mrs. Gertrude Washington, I live at 816 Michigan Avenue, Northeast, Brookland, Washington, D. C. Domestic Work.

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

A- Yes, I know them both. The Plaintiff is my sister, and the defendant, Fred. Campbell is her husband.

BY MR. DAVIS:

3Q. Are they or not man and wife, and if you say they are, tell me how you know it.

A- I was there and witnessed the marriage on December 11th, 1899. They were married by the Reverend Cherry, of the Baptist Church. They lived together as man and wife and they had four children, all told. Three of the children are dead, and one living.

4Q. How old is the living child?

A- Twenty years old.

5Q. From your observations, how did your sister treat her husband?

A- She was very kind to him. She stayed home and did her work, and had his meals ready when he came in. She was a true and faithful wife.

Gertrude Washington

6Q. Are they now living together?

A- No, they are not.

7Q. When did they separate, and which one left the other, if you know?

A- He left her, and it has been five and a half years ago.

8Q. What caused the separation, if you know?

A- What I know of the separation is that he had misconduct with his daughter, and my sister got after him about it, and then he walked off. I was there the day before that when they had trouble. I have not laid my eyes on him since then.

9Q. Where does your sister live in Baltimore, Maryland?

A- At 907 S. Second Street, Canton.

10Q. Has she or not been a resident of the City of Baltimore, State of Maryland, for more than two years prior to January 19th, 1920?

A- Yes, she has been here five years.

11Q. Since the separation, as you described it, has your sister lived with or cohabited with her husband?

A- No.

12Q. Has he in any way directly or indirectly contributed anything to her support?

A- No, he has not.

Gertrude Washington

13Q. Where does Fred. Campbell, the defendant, live now?

A- I really do not know.

14Q. Is he now, or was he on January 19th, 1920, a resident or a non-resident of the State of Maryland?

A- He is a non-resident.

15Q. Why do you say he is a non-resident of the State of Maryland?

A- They lived in Washington and the separation took place in Washington, and he has been in Washington so far as I know, ever since.

16Q. When was the last time you heard of him being in Washington?

A- I have not heard of him for about two years.

17Q. Has the abandonment of your sister by her husband continued uninterruptedly for at least three years prior to January 19th, 1920?

A- Yes, it was over five years last November.

18Q. Was the abandonment his own deliberate and final act?

A- Yes, he left because of his misconduct with his daughter, and has never come back.

19Q. Is there any reasonable hope or expectation of a reconciliation?

A- None.

- - - - -

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 other matter or thing*

BEATRICE OPEY, a witness produced on behalf of the Plaintiff, being duly sworn, deposes and saith as follows:

BY THE EXAMINER:

1Q. State your name, residence and occupation, if any.

A- Mrs. Beatrice Opey, 907 S. Second Street, Canton, Baltimore, Maryland, with my mother, and I am a cook.

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

A- Yes, the Plaintiff is my mother, and Fred. Campbell is my father, the defendant.

BY MR. DAVIS:

3Q. How old are you?

A- Twenty years old. I was twenty on January 13th, 1920.

4Q. Are your mother and father now living together?

A- No, they are not.

5Q. When did they separate and which one left the other?

A- My father left my mother on November 20th, 1914.

6Q. And you were about 14 years old at that time?

A- Yes.

7Q. Where were you living in November, 1914?

A- In Washington, D.C., at 39 O Street.

8Q. Do you remember the day that your father left?

A- Yes.

9Q. What took place that day, and what caused your father to abandon your mother?

Beatrice Opey

A- He said a whole lot of things and did things to me he had no business to do, and I told my mother, and she got after him, and he did not like it, and took and packed his suitcase, and he said he was not coming back any more, and went away.

10Q. Did your mother give him any cause for him to leave her?

A- No, she did not give him any cause to leave her, except that she complained of his treatment of me.

11Q. Has your father ever returned to your mother since then?

A- No.

12Q. Have you seen him or heard of him since then?

A- I saw him once on a Coal Wagon. He was in Washington.

13Q. Did you have any talk with him?

A- No.

14Q. When did your mother move from Washington to Baltimore?

A- She moved from Washington to Baltimore about a year after he left.

15Q. Has your father in any way contributed to your or your mother's support since he left?

A- No, he never contributed to our support.

16Q. Has or not your mother lived in the City of Baltimore, State of Maryland, for more than two years prior to January 19th, 1920?

Beatrice Opey

A- Yes, over five years.

17Q. Is your father now or was he on the 19th of January, 1920, a resident or a non-resident of the State of Maryland?

A- He never lived in Maryland, and he is a non-resident.

18Q. Has the abandonment of your mother by your father continued uninterruptedly for at least three years prior to January 19th, 1920?

A- Yes.

19Q. Was the abandonment his own deliberate and final act?

A- Yes, it was.

20Q. Is there any reasonable hope or expectation of a reconciliation?

A- Never.

- - - - -

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

Beatrice Pryor

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 **28th** day of **April** in the year of our Lord nineteen hundred **and twenty** at the City of Baltimore in the State of Maryland.

Alfred J. Carr 
Examiner.

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

Defendant's Exhibit

Alfred J. Carr
Examiner.

I, ALFRED J. CARR, 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.

Alfred J. Carr
Examiner.

Circuit Court

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19 20 *B 60* Docket No.

Mary Campbell

vs.

Fred Campbell

Order of Reference
and Report

B 20 529

No.

C 10

Order Filed *10* day of *May* 19 *20*

Report Filed *10* day of *June* 19 *20*

Mary Campbell

vs.

Fred Campbell

IN THE
Circuit Court
OF
BALTIMORE CITY

May

Term, 1920

This case being submitted, without argument, it is ordered by the Court, this 10 day of May, 1920, that the same be and it is hereby referred to Ward B. Cox, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Robert F. Stanton

Report of Auditor and Master

Bill for divorce a vinculo matrimonii and for the custody of the minor child of the parties filed by the wife against her husband on the ground of abandonment. Code 1911, Art. 16, secs. 36-41.

Defendant proceeded against as a non-resident and his non-residence proven.

Plaintiff's residence in Baltimore City for more than two years proven.

The marriage proven.

The abandonment for three years, its finality and the irreconcilability of the parties proven.

The minor child whose custody is prayed is a female over the age of eighteen years.

A decree pro confesso was passed against the defendant and more than thirty days have since elapsed.

Case ready for decree.

Ward B. Cox

Auditor and Master.

Fee \$9 paid.

May 17th, 1920.

✓ 94

CIRCUIT COURT

B--40--

1920.

No. 60 Docket

MARY CAMPBELL

VS.

FRED CAMPBELL,

Decree of Divorce

B No. 20529

Ad 18 June 1920

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

Maud B. Cox

Auditor and Master.

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

MARY CAMPBELL

VS.

FRED CAMPBELL

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 *18th* day of *June*, A. D. 1920, by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said Mary Campbell

the above named Complainant be and she is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, the said Fred Campbell.

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

Robert J. Stanton