

In The Circuit Court
of B199
Baltimore City 1910

Francis J. Jones

vs

John W. Jones

George Jones & Francis

vs. etc please file

(~~John~~ Jones)

320841

(1X2)

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BALTIMORE, MD.

Adapt 20

Frances I. Goines

In The Circuit Court

vs.

of

John W. Goines

Baltimore City.

To The Honorable, The Judge of said Court:

Your Oratrix, complaining, respectfully says:

FIRST, That the parties hereto were married in Baltimore, June 19, 1907 by Father Nally, a catholic priest, and lived together as man and wife until on or about the 10th. day of March, 1917.

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 defendant is a non-resident of the city and state and when last heard of, was in Atlantic City, N.J.

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 declared his intentions to live with her no longer; that such abandonment has continued uninterruptedly 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 are no children as result of said marriage.
WHEREFORE YOUR ORATRIX PRAYS:

- a- A divorce a vinculo matrimonii from the defendant.
- b- Such other and further relief 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.

Frances I. Goines
Complainant

[Signature]
Solicitor for complainant.

State of Maryland)
) To Wit
Baltimore City.)

I hereby certify that on this 6th day of April 1920, before me the subscriber, a Notary Public in and for Baltimore County, State of Maryland, personally appeared Frances I. Goines, 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 belief.



Arthur N. Rogers
Notary Public.

J. Steward Davis, Solicitor

118 E. Lexington St.

In The Circuit Court of Baltimore City.

Frances I. Goines Vs. John W. Goines

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 on or about June 19, 1907 by Rev. Father J.J. Nally, a Catholic priest; and lived together as man and wife on or about March 10th. 1917. 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 Atlantic City, N.J. 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 are no children as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City, ordered this ^{8th} day of ^{April} 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 ^{8th} day of ^{May} 1920; and give notice to the said defendant, John W. Goines (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 ~~day~~ ^{24th day of} May 1920. to show cause if any he may have, why a decree should not be passed as prayed.

Robert F. Stinson

1917
1920 Blue Docket No.

Gomes

vs.

Gomes

Certificate of Publication

B 20841
(3)

THE DAILY RECORD.

Filed 27 day of May 1920

THE DAILY RECORD

Baltimore, APR 30 1920, 192

J. Steward Davis, Solicitor,
118 E. Lexington St.
IN THE CIRCUIT COURT OF BALTI-
MORE CITY—(B-197-1920)—Frances I.
Goines vs. John W. Goines.

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 on or about June 19, 1907, by Rev. Father J. J. Nally a Catholic priest, and lived together as man and wife until on or about March 10th 1917. 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 State, and when last heard of was in Atlantic City, N. J. 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 are no children as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City, ordered this 8th day of April, 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 8th day of May, 1920, and give notice to the said defendant, John W. Goines (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 26th day of May, 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.

ap9,16,23,30

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

of Baltimore City Case of

Frances I. Goines

vs.

John W. Goines

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

8th day of *May*, 1920

First insertion *April 9th*, 1920

THE DAILY RECORD.

Per

J. W. Crapster

1917
19120

~~Geo~~
Docket

Ct. Ct.

Gomes

vs.

Gomes

Decree Pro Confesso.

20841
No.

(4)

Filed

27 May 1920

Francis J. Goines
vs.

John W. Goines

IN THE
Circuit Court
OF
BALTIMORE CITY.

May 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 ~~will~~, (said Order).

It is thereupon this *27* day of *May* 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 J. Stauber

STATE OF MARYLAND,
BALTIMORE CITY, SCT :

I hereby certify that on this *25th* day of *May* 19 *20* before me, the subscriber, a Notary Public, of the State of Maryland, in and for the City aforesaid, personally appeared *Francis Irene Goines*, 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 M. Rogers
Notary Public.



Francis Irene Goines

Docket B. 197/1920

IN THE CIRCUIT COURT

Frances I. Goines

vs

John W. Goines

DEPOSITIONS

No. 20841

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 1 day of June 1920

Frances I. Goines

vs.

John W. Goines

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
27th day of May, 1920, met on
the 27th day of May in the year nineteen
hundred and twenty at my office, in the City of Baltimore, in the State
of Maryland, and assigned the 27th day of May
in the same year at two o'clock in the after 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:—

FRANCES I. GOINES, 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, if any.

A- Frances I. Goines, 2113 Division Street, Baltimore, and I am a Hairdresser, and Manicurist.

2Q. Who are the parties to this suit?

A- I am the Plaintiff, and John W. Goines, is my husband, the defendant.

BY MR. DAVIS:

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

A- On June 19th, 1907, by the Reverend Mr. Nally, of St. Peters Plavius Church, in Baltimore, Maryland.

4Q. How long have you been a resident of the City of Baltimore, State of Maryland, prior to April 8th, 1920?

A- All my life. I was born here.

5Q. Were any children born of this marriage?

A- No.

6Q. Where did you and your husband live together as man and wife immediately after the marriage?

A- At 2113 Divison Street, Baltimore.

7Q. Are you now living together?

A- No.

8Q. What has been your conduct and treatment towards your husband during the whole of your married life?

Frances I. Goines

A- I have always been a good and faithful wife. My conduct was kind and affectionate and above reproach. I provided for him, and I worked and supported him, besides myself, because he would not work.

9Q. What was his treatment and conduct towards you?

A- He never supported me, and was cruel at times, and brutal, and was very abusive, and he ran with women.

10Q. What do you mean by cruel and brutal treatment?

A- He would come home intoxicated, and on one occasion he struck me. He used vile language, and abused me in every way.

11Q. When did you separate, and which one left the other?

A- He abandoned me and left me ill in the Hospital over five years ago.

12Q. Where was it that he abandoned you and left you ill in the Hospital?

A- In the City of New York. I was taken sick there while I was working.

13Q. What occurred on that day, five years ago, that induced him to abandon you?

A- About a week before that day, he came to the Hospital, to see me, when my mother came to the Hospital and told me that he had taken his clothes, and everything out of the house and had gone. That he had taken his things out at night, and from that time on I have never seen him but once.

Frances I. Goines

I have had no communications from him, or with him.

14Q. You have testified you saw him once. Where did you see him at that time?

A- I ~~saw~~ saw him a week before he took his clothes in April, 1915, when he came to the Hospital. About a week after that he took his things out of the house, and my mother came to me, and told me of it. He has never been back, but the last time and only time I saw him was on the tenth of March, 1917, at my father's funeral. I was surprised to see him, but he was there, and that is the last time that I have seen him or heard of him.

15Q. You have alleged in your bill of complaint that the abandonment took place on the tenth of March, 1917.

A- Yes.

16Q. And you have testified that it actually place in April, 1915.

A- Yes.

17Q. How do you explain that?

A- Why, I thought it was best to take the date that I have last seen him.

18Q. Since the abandonment of you, as you say in April, 1915, have you lived with or cohabited with your husband?

A- No, I have not.

19Q. Has he in any way directly or indirectly contribute d anything to your support?

Frances I. Goines

A- No. He has not.

20Q. Do you know where he is living now?

A- No.

21Q. Is he now or was he on April 8th, 1920, a resident or a non-resident of the State of Maryland?

A- He was a non-resident.

22Q. Why do you say that?

A- Because the last time I heard of him he was in Atlantic City, New Jersey.

23Q. When was the last time you heard of him?

A- The last time I heard of him a gentleman told me he saw him in Atlantic City. I know he has not lived in Maryland during the last three years.

24Q. Has the abandonment of you by your husband continued uninterruptedly for at least three years prior to April 8th, 1920?

A- Yes, he left me five years ago, and it has been over three years since I last saw him at my father's funeral.

25Q. Was it his own deliberate and final act?

A- Yes. It was his own deliberate and final act. He had no occasion to leave me. I was a good wife to him, and he has never done anything for me or communicated with me, and it must have been his final act.

26Q. Is there any reasonable hope or expectation of a reconciliation?

A- No. 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*

Frances Irene Goumes.

JOHN STERRETTE, 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.

A- John Sterrette, 3113 Division Street, Baltimore, and I am in the Automobile business.

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

A- Yes, the Plaintiff is my sister, and John W. Goines is her husband, the defendant.

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 present at the wedding and saw them married by the Reverend Father Nally, at St. Peters Plavius Church, in the month of June, 1907.

4Q. Did they or not live together as man and wife after the marriage?

A- Yes, they did.

5Q. Were any children born of this marriage?

A- No.

6Q. Has or not your sister, the Plaintiff in this case, been a resident of the City of Baltimore, State of Maryland, for more than two years prior to April 8th, 1920?

A- Yes, she has been here all her life. This has been her home, only when she was away working.

John Sterrette

7Q. Did you visit them?

A- Yes.

8Q. From your observations, what was the conduct and treatment of your sister towards her husband during the whole of their married life?

A- Very kind and affectionate to him all the time. She could not have been better as a wife. She was a true and faithful wife to him.

9Q. How did he treat her?

A- He was very cruel to her. He would come home under the influence of liquor, and would not work. She had to work to support him. He would threaten her, and curse her, and abuse her in every way.

10Q. Are they now living together?

A- No.

11Q. When did they separate and which one left the other, if you know?

A- He left her in April, 1915. He left her ill in the Hospital, in New York.

12Q. How do you know that?

A- I was right there. We were all in New York, and I visited the Hospital every day and he was at the same house with us. And I know the night that he took his things out of the house, and never came back again.

John Sterrette

13Q. Since April, 1915, as you say, has your sister and brother-in-law lived together or cohabited together?

A- No. They have never been together since he never came back to our house while we were in New York, but once when we returned to our home in Baltimore.

14Q. When was it when he came to the house on that one occasion?

A- My father died, and as the funeral took place on the tenth of March, 1917, he having died on the second of the month, and he came into the house at the funeral.

15Q. Do you know where he was living at that time?

A- He came from Atlantic City.

16Q. Did he or not at that time have any conversation with his wife?

A- No.

17Q. Did he have any conversation with you?

A- No. He did not speak to her or with me, for I was with her all the time until the funeral was over.

18Q. After the funeral, did he come back to the house?

A- No.

19Q. Has he been back since?

A- No.

20Q. Has he in any way contributed anything to his wife's support?

A- No.

John Sterrette

21Q. Do you or not know whether he has lived in Atlantic City since the separation?

A- Yes. He came to New York when my sister was in the Hospital and he visited her twice, and whilst he was in New York, he told me he was living in Atlantic City, and had just come up to see how she was.

22Q. Did he or not tell you anything else?

A- Yes. He told me that he had a woman he was living with in Atlantic City, that he had tough luck. The woman he was living with in Atlantic City was also sick, and he had to nurse her.

23Q. Have you seen him since the funeral?

A- No.

24Q. Is he now or was he on April 8th, 1920, a resident or a non-resident of the State of Maryland?

A- He is a non-resident of the State of Maryland. He does not live here.

25Q. Why do you say that?

A- Because I know that he was living in Atlantic City, and I have heard of him through other people, as being in Atlantic City, but whether he is still there now I do not know. I am sure he is not in Maryland.

26Q. Was the abandonment of your sister by her husband continued uninterruptedly for at least three years prior to April 8th, 1920?

John Sterrette

A- Yes. It is over three years, since the last time she saw him, which was at my father's funeral, but he left her in 1915.

27Q. Was it or not his own deliberate and final act?

A- Yes, it was. She was a good wife to him, and he had no occasion to leave her.

28Q. Is there any reasonable hope or expectation of a reconciliation, in your opinion?

A- No, there could be 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 *John Stovette*

THERESA WOODWARD, 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- Miss Theresa Woodward, I am living at present in New York City, and I am in training there.

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

A- Yes, the Plaintiff is my cousin, and the defendant is her husband.

BY MR. DAVIS:

3Q. Were any children born of this marriage?

A- No.

4Q. Has or not your cousin been a resident of the City of Baltimore, State of Maryland, for more than two years prior to April 8th, 1920?

A- Yes, she has lived here more than two years. In fact, this has been her home all her life, and she has only been away to work at times.

5Q. Did you visit your cousin and her husband while they were living together?

A- Yes, often.

6Q. How did your cousin treat her husband?

A- She was very kind and affectionate to him, and treated him as a wife should.

7Q. How did he treat her?

Theresa Woodward

A- He was anything else but a kind husband, and he did not support her. she had to work to make a living for the both of them, and he would get drunk.

8Q. Are they now living together?

A- No.

9Q. When did they separate, and which one left the other, if you know?

A- I have been told that he left her when she was in the Hospital in New York, but I saw him at her father's funeral in March, 1917.

10Q. Did you speak to him?

A- No.

11Q. Had your cousin and her husband been living together to your knowledge, prior to the funeral of her father?

A- Not for a couple of years.

12Q. Has she and her husband lived together since he visited the house at her father's funeral?

A- No.

13Q. Do you know where the defendant is?

A- No.

14Q. Is he a resident or a non-resident of the State of Maryland?

A- He is a non-resident of the State of Maryland.

15Q. Why do you say that?

A- Because the last time I heard of him he was working in Atlantic City.

Theresa Woodward

16Q. When was that?

A- I can't recall the time, but it has been some little time.

17Q. Has the abandonment of your cousin by her husband continued uninterruptedly for ~~at~~ least three years prior to April 8th, 1920?

A- Yes. I can't tell you how long, but I know it is over three years since he was at her father's funeral.

18Q. Was it or not his own deliberate and final act?

A- Yes, it was.

19Q. Is there any reasonable hope or expectation of a reconciliation, in your opinion?

A- No.

- - - - -

Question by the Examiner:

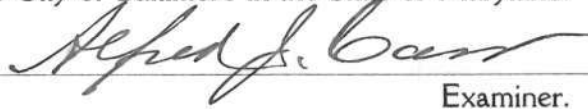

Do you know or can you state any other matter or thing that may be of benefit or advantage to the parties to this suit or either of them or that may be material to the subject of this your examination or the matters in question between the parties? If so, state the same fully and at large in your answer.

Answer:

No

Theresa Woodward.

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 first _____ day of June _____ in the year of our Lord nineteen hundred and twenty _____ at the City of Baltimore in the State of Maryland.

 
Examiner.

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

Defendant's _____ Exhibit _____


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 _____.


Examiner.

197
19^{no}

Circuit Court

19

Docket No. _____

Francis Jones

vs.

John Jones

Order of Reference
and Report

Care

B

20841

No. _____

(6)

Order Filed 18 day of June 19^{no}

Report Filed _____ day of _____ 19

Francis Jones

vs.

John Jones

IN THE
Circuit Court

OF
BALTIMORE CITY

May

Term, 1920

18th

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

Robert F. Lamm

Report of Auditor and Master

Bill for divorce a vinculo matrimonii 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.
A decree pro confesso was passed against the defendant
and more than thirty days have since elapsed.

Case ready for decree.

Harold B. Cow

Auditor and Master.

Fee \$9 paid.

June 28th, 1920.

112
113

CIRCUIT COURT

B-191-7

1920.

No. 60 Docket

FRANCES I. GOINES

VS.

JOHN W. GOINES.

Decree of Divorce

B No.

20841

477

fd 1 "July 1920

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

Ward B. Cox

Auditor and Master.

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

FRANCES I. GOINES

VS.

JOHN W. GOINES

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 1st day of July, A. D. 1920, by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said Frances I. Goines the above named Complainant be and she is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, the said John W. Goines.

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

Man. A. Lopez