In he aren Edward Co Brill for annulments) Mornay My Complease the (Strain 323043 EVA COUSINS

VS

OF

EDWARD COUSINS

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your oratrix complaining respectfully says: --

FIRST, That she was married to the defendant on or about January 6th. 1920, in the State of Maryland.

SECOND, There are no children born as a result of said marriage.

THIRD, That your Oratrix has been a resident of Baltimore City, State of Maryland, for more than two years prior to the filing of this Bill of Complaint.

of June 1927, learned that her marriage to the said Edward Cousins was null and void for the reason that the said Edward Cousins was at the time he contracted marriage with your oratrix a married man and had never been legally divorced from his wife, a certain Susan Cousins.

FIFTH, That on or about the 21st. day of June 1920, the said Edward Cousins, without any just cause or reason, abandoned and deserted your oratrix to live in adultery with one lewd woman whose name is known to your oratrix.

SIXTH, That on learning the fact that the said Edward jones had contracted a bigamous marriage, your oratrix has never lived or cohabited with him since nor in any wise consoned the offense.

WHEREFORE YOUR ORATRIX PRAYS:

a-a That her marriage to the said Edward Cousins may be declared null and void, ab-initio.

-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.

ATTORNEY ON plantil

J.STEWARD DAVIS, SOLICITOR

14 E.PLEASANT ST.

IN THE CIRCUIT COURT OF BALTIMORE CITY.

EVA COUSINS VERSUS EDWARD COUSINS.

ORDER OF PUBLICATION:

The object of this suit is to procure a decree for an annullment, declaring that the marriage may be declared null and void, ab-initio.

The Bill states that the parties thereto were married in the State of Maryland on or about January 6th. 1920 and lived together as man and wife until on or about the 21st. day of June 1920. That the plaintiff is a resident of the city of Baltimore, State of Maryland and has been for more than two yers 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 Buffalo New York. That your oratrix on or about day of hune 1921 , learned that her marriage to the said Edward Cousins was null and void for the reason that the said Edward Cousins was at the time he contracted marriage with your oratrix a married man and had never been legally divorced from his wife, a certain Dusan Couseus. That though the conduct of the plaintiff towards her husband was always kind and affectionate and above reproach, hewithout any just cause or reas -on abandoned and deserted her, and has declared his intentions to live with her no longer; that upon divers days and occasions the said Edward Cousin committed the crime of adultery with one lewd and abandoned woman whose name is known to your oratrix. That there are no children born as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City, ordered this day of Caloffel 921; that the plaintiff by causing 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 day of well 1921; and give notice to the said defendant Edward Cousin(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 of 1921 to show cause if any he may have, why a heree should not be passed as prayed.

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Sources

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Certificate of Publication

B23043

THE DAILY RECORD
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THE DAILY RECORD

Fourth Insertion.

J. Steward Davis, Solicitor, 14 East Pleasant St.

IN THE CIRCUIT COURT OF BALTI-MORE CITY—(B-539-1921)—Eva Cousins vs. Edward Cousins.

ORDER OF PUBLICATION.

The object of this suit is to procure a decree for an annullment, declaring that the marriage may be declared null and void, ab

initio.

The bill states that the parties thereto were married in the State of Maryland on or about January 6th, 1920, and lived together as man and wife until on or about the 21st day of June, 1920. 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 Buffalo, N. Y. That your oratrix, on or about the 8th day of June, 1921, learned that her marriage to the said Edward Cousins was null and void for the reason that the said Edward Cousins was at the time he contracted marriage with your oratrix a married man and had never been legally divorced from his wife, a certain Susan Cousins. That though the conduct of the plaintiff towards her husband was always kind and 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 upon divers days and occasions the said Edward Cousins committed the crime of adultery with one lewd and abandoned woman whose name is known to your oratrix. That there are no children born as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City, ordered this 20th day of October, 1921, 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 21st day November, 1921, give notice to the said defendant, Edward Cousins (now absent), of the object and substance of this bill, and warn him to be and appear in this Court, in person or by solicitor, on or before the 7th day of December, 1921, to show cause, if any he may have, why a decree should not be passed as prayed.

CHAS. W. HEUISLER.

True copy—Test: CHAS. R. WHITEFORD, oc21,28n4,11 Clerk.

		Baltimore,	eber 14, 1921
	1//	certify that the a	
ment of O	rder sebl	ication	Circuit Court
	G va C	ore City, Case of. Occisions	
vs	Edward !	Cousins	
was publi	shed in THE D	AILY RECORI	O, a daily news-
paper pul	blished in the Ci	ty of Baltimore,	once in each of
	Four	successive	weeks before the

Per hadeus W. Grapster

21 st day of November , 1921

539	Ct. Ct. No. 2
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[DECREE PRO CONFESSO.]

Era Cousins

x Era Cousins

IN THE

Circuit Court No. # 1

OF

aroline Murray.

Edward Cousins	BALTIMORE CITY
The Defendant Elward Cousins summoned notified by Order of Publication) to appear to the Bill of Con	Term 192 having been duly pplaint and having failed to appear thereto, accord-
ing to the exigency of the writ (said Order)	
It is thereupon this day of Llee	in the year nineteen hundred
and Jiventyoue by the Circuit Court of Balt	imore City Adjudged Ordered and Decreed,
that the complainant is entitled to relief in the premises, and that the Bill against said defendant	
But because it doth not certainly appear to what relief the plaintiff is entit	eled, it is further ADJUDGED and ORDERED,
that one of the Examiners of this Court, take testimony to support the alle	egations of the Bill.
	Descender, 192/, before the laryland, in and for Baltimore City, personally the plaintiff in this action, and the defendant is not in the
military service of the United States.	

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In the Circuit Court,

OF BALTIMORE CITY

DEPOSITIONS

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PLAINTIFF	S COSTS	9
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Sheriff 250

\$ 1050

DEFENDANT'S COSTS

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In the Circuit Court OF BALTIMORE CITY. corec Pro Confesso haven and notice having been given me by the Solicitor for the Jamita, 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 ourlevel day of December 1921, met on ourlienth ____ day of December in the year nineteen hundred and levely - one at my office, in the City of Baltimore, in the State of Maryland, and assigned the fourteenth day of December in the same year at three o'clock in the after - noon and the Slewart Davis Cesa. ___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_____ _to take the following depositions, that

is to say:-

7-250

Cousins,

V.

Cousins .

Testimony taken at the office of Mr. Davis,
Pleasant Street, Baltimore, Maryland, December 14th.,
1921, at 3 O'clock P. M.

EVA COUSINS, the Plaintiff in this case, produced on her 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. Eva Cousins, Fairfield, housework.
- 2 Q. Do you know the parties to this suit?
 - A. I am the Plaintiff and my husband is the Defendant.
 BY MR. DAVIS:
- 1 Q. When were you married?
 - A. On the 6th., of January 1920 .
- 2 Q. Where?
 - A. Fairfield, Maryland.
- 4 Q. Were you married by a Minister of the Gospel?
 - A. Yes.
- 5 Q. There was a separation between you?
 - A. Yes.
- 6 Q. Which left the other?
 - A. Helleft me

- 7 Q. When?
 - A. 21st., June 1920.
- 8 Q. He left you to go away with somebody?
 - A. Yes; he left with a woman.
- 9 Q. Who?
 - A. Sadie Sesco .
- 10 Q. Where did he go with her?
 - A. To Buffalo, New York.
- 11 Q. Did you ever intercept any mail written to your husband by Sadie Cisco?
 - A. Yes.
- 12 Q. Is this the letter?
 - A. Yes .

Note: Same produced and filed with the Examiner as Plaintiff's Exhibit Examiner No. 1.

- 13 Q. Did you ask him about this letter?
- A. Yes; and he tried to laugh it off, and he told me to throw it away, and I kept it.
- 14 Q Was Sadie Sesco a married woman?
 - A. Yes.
- 15 Q. Is she a married woman?
 - A. Yes .
- 15 Q. Did you ever see her husband?
 - A. Yes

- 16 Q. Under what circumstances?
 - A. He came out enquiring about her.
- 17 Q. Where?
 - A. At Fairfield.
- 18 Q. And he told you what?
- A. He came out and he asked whether I knew where my husband was, that he had left with her.
- 19 Q. Yur husband called you over the long distance one time, did he not?
 - A. Yes.
- 20 Q. And told you to go ahead and get a divorce or whatever you wanted to get?
 - A. Yes.
- 21 Q. What was your conduct towards your husband; what sort of a wife were you?
 - A. Good as far as I knew.
- 22 Q. Were you kind and faithful to him?
 - A. Yes.
- 23 Q. And true to him?
 - A. Yes.
- 24 Q. Did you give him any cause or reason to leave you?
 - A. No sir.
- 25 Q. O to go away with Sadie Sisco?
 - A. No sir.
- 26 0. Have you been a resident of Baltimore City,

State of Maryland, for at least two years prior to the filingoof this suit?

- A. Yes; about twenty-eight years.
- 27 Q. Now, did you i nvestigate whether or not your husband had been married prior to having married you?
 - A. Yes.
- 28 Q. What did you find out.
- A. He told me that his wife was Susie Cousins; I wrote to his father and I wrote a letter to Susie Cousins in care of his father asking whether she was his wife and got the answer that she was positively lawfully married to him.
- 29 Q. And you say that your husband confessed to .
 you that he was married prior to the time that he was
 married to you?
 - A. Yes.
- 30 Q. And did he confess that he was lawfully married, and that there was a valid and subsisting marriage existing at the time he was married to you?
 - A. Yes.
- 31 Q. And that his wife was still living?
 - A. Yes.
- 32 Q. And not divorced?
 - A. Wo sir; he was never divorced. That is what

he told me.

- 33 Q. Where did you get this letter (indicating)?
- A. I found it in the valise after he went away.

 Note: Same produced and filed with the Examiner

 marked Plaintiff's Exhibit Examiner No. 2.
- 34 Q. Did you confront him with this letter?
 - A. I discovered it after he went away .
- 35 Q. Did you ever receive a letter from his first wife?
 - A. Yes.
- 36 Q. Is that the letter (Handing witness letter).
 - A. Yes.
- Note: Same produced and filed with the Examiner as Plaintiff's Exhibit Examiner No. 3.
- 37 Q. You have alleged that your husband has been guilty of adultery; do you know anything personally about this?
 - A. Only the letters and what he has told.
- 38 Q. Have you lived or cohabited with him sinceyou discovered his adulteries?
 - A. Wo sir.
- 39 Q. Have you lived or cohabited with him since he admitted his adulteries to you?
 - A. No sir.

- 40 Q. Have you forgiven or condoned his offense in any way?
 - A. No sir; I have not.

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 q estion between the parties? If so, state the same fully and at large in your answer.

Eva Cousin

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

BY THE EXAMINER:

- 1 Q. State your name residence and occupation?
 - A. Martha Monus , Fairfield, Maryland; house work.
- 2 Q. Do you know the parties to this suit?
 - A. Yes.

BY MR. DAVIS:

- 1 Q. Were you present at the marriage?
 - A. Yes.
- 2 Q. You know that they were married?
 - A. Yes.
- 3 Q. And the marriage certificate -- The marriage ceremony was performed January 6th., 1920?
 - A. Yes.
- 4 Q. Where were they married?
 - A. Fairfield, Maryland.
- 5 Q. By whom?
 - A. The Reverend Mr. Goodman.
- 6 Q. They lived together until on or about the 20th., June 1920?
 - A. Yes.
- 7 Q. You visited them when they went to housekeeping?
 - A . Yes.

Martha Monus.

- 8 Q. Did they liv togethr as husband and wife?
 - A. Yes.
- 9 Q. How long has the Plaintiff been a resident of the State of Maryland?
 - A. As long as she has lived here.
- 10 Q. Well, how long has she lived here.
- A. I have been in Maryland eighteen years, and I found her here.
- 11 Q. Now, her husband, the Defendant in this case, is he a resident or a non-resident of the State of Maryland?
 - A. No sir; he is not here.
- 12 Q. Wiere was he the last heard of.
- A. The last letter that she showed me was in Buffalo, New York.
- 13 Q. He was last heard of in Buffalo, New York?
 - A Yes.
- 14 Q. Who did he live there with; Who did he leave here with?
- A. He left here with a woman by the mame of Sadie Sisco.
- 15 Q. Is she married or single?
 - A. Married.
- 16 Q. Do you know whether or not her husband had occasion to want to see Mrs. Cousins.

Martha Monus.

- A. Yes; I know that he came out to see her.
- 17 Q. Why did he come?
- A. He wanted to know from her where was her husband, and he said that her husband had gone away with his wife.
- 18 Q. He was trying to locate his wife?
 - A. Yes.
- 19 Q. What was Mrs. Cousin's conduct towards her husband, what sort of a wife was she towards him?
- A. She was a good and honest and kind and affectionate wife.
- 20 Q. Did she perform her household duties towards her husband?
 - A. Yes.
- 21 Q. Did she give him any cause or reason to leave her and live in adultery?
 - A. No sir.
- 22 Q. Has she ever condoned or forgiven the offense of adultery; has she ever lived or cohabited with him since she discovered it?
 - A. No sir.
- 23 Q. Are there any children born as the result of this marriage?
 - A. No sir.

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.

Martha Manus

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

BY THE EXAMINER:

- 1 Q. S'ate your name residence and occupation?
 - A. Geneva Rooks, Fairfield, housework.
- 2 Q D you know the parties to this suit?
 - A. Yes.

BY MR. DAVIS:

- 1 Q. You were not present at the marriage?
- A. No gir; but I could have been; I was right next door.
- 2 Q. Did you ever visit them while they lived together as husband and wife?
 - A. Over to her mother's.
- 3 Q. Were they living together as husband and wife?
 - A. Yes.
- 4 Q. Were they known in the community as husband and wife
 - A . Yes.
- 5 Q. And did they hold themselves out as husband and wife?
 - A. Yes.
- 6 Q. There was a separation on June 21st., 1920; did he leave her or did she leave him.

Geneva Rooks.

- A. He left her.
- 7 Q. Left, How?
 - A. He lefthher.
- 8 Q. He left her
 - A. Yes.
- 9 Q. Where did he go?
 - A. To Buffalo, New York.
- 10 Q. With whom did he go?
 - A. With a woman named Sadis Sisco.
- 11 Q. Married or single?
 - A. Married.
- 12 Q. Do you know whether or not Sadie Sisco's husband had occasion to visit Mrs. Cousins?
 - A. Yes.
- 13 Q. What did he want to know.
 - A. He wanted to find out where his wife was.
- 14 Q. What did he want to know about that.
- A. He wanted to locate him so that he could locate his wife.
- 15 Q. Did he say anything about his wife being with Mrs. Cousin's husband?
 - A. Yes.
- 16 Q. And he wanted to find out, because they had

Geneva Rooks.

- A. Yes.
- 17 Q. What was Mrs. Cousin's conduct towards her husband
- A. A good and faithful wife, and she tried to make everything comfortable for him in the home.
- 18 Q. Did she give him any cause or reason to leave her?
 - A. No sir.
- 19 Q Was she true to him?
 - A. Yes.
- 20 Q. How long hs the Plaintigf been a residut of the State of Maryland?
- A. I do not know. I know of four years that she has been here.
- 21 Q. Are there any children as the result of this marriage?
 - A. No sir.
- 23 Q. His she ever lived or cohabited with her husband since she discovered his adulteries?
 - A. No sir.
- 23 Q. Has she ever forgiven or condoned his offense of adultery in any way?
 - A. No sir.
- 24 Q. Is the Defendant a resident or a non-resident of the State of Maryland?
 - A. Non-resident

Geneva Rooks.

- 25 Q . Where was he the last heard of?
 - A. Buffalo, New York.

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.

1. -- Us. Genera Rooks

No other witnesses being named or produced before me, I then, at the request
of the Solicitorof the
closed the depositions taken in said cause and now return them closed under my
in the year of Our Lord nineteen hundred and Twenty our at the
in the year of Our Lord nineteen hundred and Swenty your at the
City of Baltimore, in the State of Maryland.
Cole Copping (SEAL). Examiner.
Examiner.
44
There are Exhibits with these depositions, to wit: Plaintiff's Exhibit Examinin Onos. 1, 2 + 3
Plaintiff's Exhibit & amunio O Nos. 1, 2 7 3.
Defendant's Exhibit Exhibit
· · · · · · · · · · · · · · · · · · ·
Celled Sappington
Examiner.
I, A. de RUSSY SAPPINGTON, the Examiner before whom the fore-
going depositions were taken, do hereby certify that I was employed in assigning
a day, and taking the said depositions upon Livo days, on bail
of which I was employed by the Plaintiff, and onONONL
by the Defendant
Ceder Aspingting
Examiner.

 $\mathbf{Doc.} \quad \mathbf{19} \quad \mathbf{539} \\ \mathbf{19} \, \mathbf{21}$

IN THE CIRCUIT COURT

No.

OF BALTIMORE CITY

Eva Cousius

VS.

Edward Cousins

PLAINTIFF'S EXHIBIT
EXAMINER No./

No. 2,394329.

FILED WITH THE EXAMINER

Sec. 14,1921.

A. deR. SAPPINGTON

EXAMINER 1900

Jan & 1920 11410 sharp st hopelear priend i willwrite you a new ling to let youhere prome me ian well truly hop you any the same love i go a way to dow with mis stell to nor for bisvil try to gat back satisfy if is can because i don't want togs at all is would label for you to went along with us because you could care cary me award and let me see the show but i hope that i Can 20 with you soon am you can Cary me around to see The Islace an so su your people to but i word labors say you be por i went away

but love if i is not backby satday will you give bist somemonney be for he 20 Carry and tell him that was not go to beat him out of his monney becaus he suchas cary carry line a road about you an the monneysoalliasbypu to givitto him an invil su you when i comprado i have so to tell you, saydlar a had some youd for Supper last night wish that ynwas with melast night so we could had a good time but dear i woorld lab for you toget my sho for my so i can harra foair shot when is come back on ifop gut them you gat me 3 & half be sure to gat me pare of good sholper sunday to cause if

you don't gut my my show is will nevery gut a pare this winter so i had to look to you for them so dear of the hope you wont be as along as beit is gat a will never gat theme so i will closy withe love to you so i hope to su you soon i will try to got back satday to selyon ming sweet pississ to to you don't let the go girl run away with you be por in got back you put DOC. 73 539

IN THE CIRCUIT COURT

No.----

OF BALTIMORE CITY

Eva Cousiis

VS.

/ Edward Cousins

PLAINTIFF'S EXHIBIT EXAMINER No. 2

No. 2, 3043 19.

FILED WITH THE EXAMINER

Dec. 14, 1921.

A. deR. SAPPINGTON

fd 12 may 1920

An Northumberland got. 105 My Dear Brother; wasts hand efew day part Which I was much than slad to hear from you and well Deant 200 that I am well, I have been sich since 9 mite You last, Brother you over her on the record now I will asked you to come on the ninth

good chines the best I can Hat celetter from home all was well. how wite real won and let me hear from you. Brother will you Set that home about Today wore times. Hid mis Said die get my setter I had areal mice letter from mis Eva William. you wit 7 and outpu

which will be away after and I will get off anice stime. In ill'also see ig Willie ean beoff. Brother of thought miss Saddie was married. Brother who closet you go home and get you devise from sount Suren and them go and marie who yo love I was in hope That mis Eva William would be the mest life yn manie q.

Day you can towing troj you want to so wite and let me bou of the 9 my out of not day how would you like to have bre Cormick for your brother in law please tell me in your nest letter how builtin you must write me what train you are coming on. And I want In to be some and come

DOC. 79 539
IN THE CIRCUIT COURT
No
OF BALTIMORE CITY
Eva Consins
vs.
Edward Cousins

PLAINTIFF'S EXHIBIT EXAMINER No.

No. 2, 30433

FILED WITH THE EXAMINER

Vec. 14, 1921.

A. deR. SAPPINGTON

A EXAMINER

May 1922

brewe va R. J. D H 3= BOX 71 June 8=21 deal mir smith & receive your letter you all and it offward me no little degree of pleasure to selethat there is still some people desires to do. Mot Which is right and positivily lawfully Caryzon but the court sessed is now going

2000 M - c - y mey [led 10 days Consultandas is the so that should, e circle to the De dan Conggin lover Va B 3 9 8 3 B - 1 7/

124
Circuit Court 539 192, 36 Docket No.
Louins
Courses
Order of Reference and Report
Atests.
593043
9 1 3043 No.

IN THE Circuit Court OF BALTIMORE CITY Term, 19 This case being submitted, without argument, it is ordered by the Court, this... 19 , that the same be and it is hereby referred to day of... Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon Report of Auditor and Master