

In The Circuit Court

of B 642
Baltimore City

1924
Weldon Monroe

vs

Calder Monroe

Petition for Joinder of Issues

And Clerk please file

~~(Signature)~~

B 23236

(1)

DAVIS & BISHOP

ATTORNEYS AT LAW

BANNEKER BUILDING

140 E. PLEASANT STREET

BALTIMORE, MD.

A 12th Dec 1924

WELDON MONROE

IN THE CIRCUIT COURT

VS

OF

CALLIE MONROE

BALTIMORE CITY.

.....

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your orator complaining respectfully says:-

FIRST, That the parties hereto were married in Pennbrook, North Carolina, April 15, 1916 by a magistrate, named Mr. McKenna, and lived together as man and wife until on or about November 28, 1918.

SECOND, That your orator 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 also a resident of the State of Maryland.

THIRD, That though the conduct of your orator towards his wife has always been kind, affectionate and above reproach, she without any just cause or reason abandoned and deserted your orator, and committed the act of adultery with lewd and abandoned men whose names are unknown to your orator; 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 orator has never condoned nor forgiven the said desertion and adultery, that he has never cohabited with the said respondent since the said desertion and adultery.

FIFTH, That there are no children born as a result of said marriage.

WHEREFORE YOUR ORATOR PRAYS:

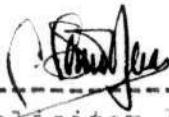
a-a A divorce a Vinculo Matrimonii from the defendant.

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

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

As in duty bound, etc.

Complainant



Solicitor For Complainant.

311

642 B61 Ct. Ct.
1921 Docket No.

Monroe
v
Monroe

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. ^{Pro} B 23236
2

Filed 19 Dec 1921
J. L. Davis
SOLICITOR

758 N. Mulligan

Summoned and a copy of the Process left with
The defendant

Thomas J. McCully
Sheriff

(Kelly)

Fees \$0.80

Equity Subpoena
The State of Maryland

Carrie Monroe

Carrie Monroe

Carrie Monroe

MEMORANDUM
Office of the Clerk of the Court
You are required to the Court House Baltimore City within three days
after return day.
(Signed) Philip H. Jones

EQUITY SUBPOENA

The State of Maryland

To

Callie Monroe

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you do within the time limited by law beginning on the second Monday of **January** next cause an appearance to be entered for you and your answer to be filed to the complaint of

Neldon Monroe

against you exhibited in the Circuit Court of Baltimore City,

HEREOF fail not, as you will answer the contrary at your peril:

James P. Gorter

WITNESS, the Honorable ~~MORRIS A. SOPER~~ Chief Judge of the Supreme Bench of Baltimore City, the **14th** day of **November** 1921

Issued the *12* day of **December**, in the year 1921

CHAS R. WHITEFORD

Clerk.

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11.)

In the 649
Ch Court of 1921
Baltimore City

Weldon Monroe
vs
Callie Monroe

Answer of the
Defendant to
Bill of Complaint

Mr. Clerk:
Please file

W. Grant Tyler
Sol for Defendant

758 W. Mulberry St

B23236
3

fd 9 Jan 1922

WELDON MONROE

VS.

CALLIE MONROE

#

IN THE
CIRCUIT COURT OF
BALTIMORE CITY.

To the Honorable, the Judge of the aforesaid court:-----

The answer of the defendant in the above entitled cause,
respectfully represents unto this Honorable Court ;-----

1.

That the defendant herein named admits the marriage as herein
alleged by the plaintiff.

2.

That the defendant herein emphatically denies the abandonment
alleged by the plaintiff.

3.

That the defendant is a resident of Baltimore City and has
been for more than two years last past.

4.

That the defendant admits there are no children now living.

HAVING ANSWERED all the allegations in the BILL the defendant prays,
that in due time the plaintiff, \$ Bill be dismissed with his reasonable
cost.

#####

And as in duty bound etc.

U. Grant Tyler

Solicitor for the defendant.

WELDON MONROE

VS.

CALLIE MONROE

#

IN THE

CIRCUIT COURT ~~NO. 22~~ OF

BALTIMORE CITY

JANUARY, TERM: 1922.-----

MR. CLERK:-----

PLEASE ENTER MY APPEARANCE FOR THE DEFENDANT.

U. Grant Tyler

Solicitor for the Defendant.

I, the undersigned, authorize and empower, U. Grant Tyler, to enter his appearance for me as and for my Attorney in the above entitled cause, and to act for me and in my stead and on my behalf and to do for me what is for my best interest and benefit in the above entitled cause.

Callie Monroe

Defendant.

CIRCUIT COURT

642 B61
19 21 Docket No.

Weldon Monroe

vs.

Callie Monroe

Order

19

Petition for leave to take
Testimony and Order
of Court thereon.

Sapp
3
No. 23236

Sapp <4>

Fd

J. H. H.

19

22

Weldon Monroe

vs.

Callie Monroe

IN THE
Circuit Court
OF
BALTIMORE CITY

To the Honorable the Judge of the
Circuit Court of Baltimore City:

THE PETITION OF Weldon Monroe

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


Solicitor for Callie

ORDERED, this 9th day of January 1922, that leave be granted to the parties to the cause, to take testimony, as prayed, before any one of the Standing Examiners of this Court.

Carroll T. Bond

Doc. 73 595
1921

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Mildon Monroe

vs.

Callie Monroe

No. 23236A

PLAINTIFF'S COSTS

Examiners.....\$ 8⁰⁰
Copies.....
Sheriff.....
Stenographer.....2⁰⁰
\$ 10⁰⁰

DEFENDANT'S COSTS

Examiners.....\$
Copies.....
Sheriff.....
Stenographer.....

\$
A 14 Feby 1922

Ardou Monroe

vs.

Callie Monroe

In the Circuit Court

OF BALTIMORE CITY.

The above cause being at issue

and notice having been given me by the Solicitor for the *plaintiff* of a desire to take testimony in the same, I, A. de RUSSY SAPPINGTON, one of the Standing Examiners of the Circuit Courts of Baltimore City, under and by virtue of an order of the above named Circuit Court, passed in said cause on the

ninth day of *January* 19*22*, met on the *ninth* day of *January* in the year nineteen hundred and *twenty-two* at my office, in the City of Baltimore, in the State of Maryland, and assigned the *ninth* day of *January* in the same year at *one* o'clock in the *after* noon and the office of *J. Stewart Davis, Esq.* in the City and State

aforsaid, 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:—

8-272

Monroe ,

v.

Monroe.

Testimony taken at the office of Mr. Davis,
Pleasant Street, Baltimore, Maryland, January 19th.,
1922, at one O'clock P. M.

WELDON MONROE, the Plaintiff in this case,
produced on his 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. Weldon Monroe , 1412 East Madison Street; waiter.
- 2 Q Do you know the parties to this suit?
- A . Yes.

BY MR. DAVIS:

- 1 Q. When were you married?
- A. April 15th., 1916, by a Magistrate.
- 2 Q. Where?
- A. At a place called Pembrook . North Carolina.
- 3 Q. Were you lawfull married according to the Laws
of Nortⁿ Carolina?
- A. Yes; I bought the license and it cost me threee
dollars.
- 4 Q. Has the Plaintiff,- yourself,- been a resident
of Baltimore City, State of Maryland, for at least two

Weldon Monroe.

years prior to the filing of this suit?

A. Yes; ever since I married her.

5 Q. Are there any children as the result of this marriage?

A. No sir.

6 Q. What was your conduct towards your wife while living together; how did you behave yourself.

A. I tried my best - the best that I could to treat her right and she just walked out.

7 Q. State whether or not you were always a kind, affectionate and faithful husband?

A. Yes; I was.

8 Q. Are you and your wife living together now?

A. No sir.

9 Q. Which left the other?

A. She left me.

10 Q. When?

A. Let me see: 28th., November 1918.

11 Q. Did she have any just cause or reason to abandon and desert you at that time?

A. No sir.

12 Q. Just state exactly what happened at that time?

A. Well, we had some words, and I left, and

Weldon Monroe.

when I came back she was gone, and she surprised me; she had moved out all the things. I went to work and when I came back she was gone.

13 Q. After she left you did you go to her and try to get her to come back and live with you and do as a wife should

A. Yes.

14 Q. What was her reply?

A. She said no, that she never wanted me any more.

15 Q. Did you try more than once?

A. Yes; I tried; I wrote her letters, and did everything for about two years.

16 Q. And each time she said what?

A. She said no, that she never wanted to live with me any more.

17 Q. Has this abandonment continued uninterruptedly since the 28th., November 1918?

A. Yes.

18 Q. State whether or not said abandonment was deliberate and final; did she deliberately and finally abandon and desert you?

A. Yes.

19 Q. State whether or not there is any reasonable expectation of a reconciliation?

A. No sir.

Weldon Monroe.

20 Q. Do you ever expect to make up and live together again?

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.

A.---

No
Weldon Monroe

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

BY THE EXAMINER:

1 Q. State your name residence and occupation?

A. Charles McKenny, 807 Sommerset street; laborer.

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

A. Yes.

BY MR. DAVIS:

1 Q. Are they husband and wife?

A. Yes.

2 Q. Did they live together as husband and wife and were they always known and recognized in the community in which they lived as husband and wife?

A. Yes.

3 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.

4 Q. Are there any children of this marriage?

A. No sir.

5 Q. What was his conduct towards his wife while living together?

A. Good as far as I know.

Charles McKenney.

6 Q. State whether or not he was always a kind, affectionate and faithful husband?

A. He was, sir.

7 Q. Are the parties to this suit living together now?

A. Nossir.

8 Q. Which left the other?

A. She left him.

9 Q. When?

A. 28th., November 1918.

10 Q. How do you know that she left him on the 28th., November 1918?

A. Because he was at work and she left him, and I was at the house when it happened.

11 Q. Tell us what happened?

A. I was at the house the morning before he left to go to work, and I did not hear anything myself, and when I came back that evening she was gone; she had done moved.

12 Q. Did you try to effect a reconciliation between them after she had left her husband.

A. Yes; he sent me several times to ask her to come back and she would never come back.

13 Q. Did you ask her to come back to her husband?

A. Yes.

Charles McKenny .

14 Q. Did you tell her that her husband has sent you?

A. Yes.

15 Q. And each time she said what?

A. No; that she would not live with him any more.

16 Q. Has this abandonment continued uninterruptedly since the 28th., November 1918?

A. Yes.

17 Q. State whether or not said abandonment was deliberate and final?

A. Yes.

18 Q. State whether or not there is any reasonable expectation of a reconciliation; do you ever expect them to make up and live together again?

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.

A.---

No

Charles M. Kenney

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 1st day of February in the year of Our Lord nineteen hundred and twenty-two 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.

642

Circuit Court

19 21

Docket No. _____

Weldon Monroe

vs.

Callie Monroe

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file,

(Signature)

Solicitor for Plaintiff.

B 23236

No. _____

Filed

6
15 July

1912

~~William Monroe~~

vs.

Oddie Monroe

In the Circuit Court
of Baltimore City

January

TERM 1922

To the Honorable

Judge of Said Court:

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

[Handwritten signature]

Solicitor for Plaintiff,

U. Grant Pyles

Solicitor for Defendant.

Circuit Court

642
19 21

Docket No.

Melden Monroe

vs.

Willie Monroe

Order of Reference
and Report

Robertson

P 23236

No.

7



Order Filed *15* day of *July* 19 *22*
Report Filed day of 19

Weldon Monroe

vs.

Cassie Monroe

IN THE
Circuit Court

OF

BALTIMORE CITY

January

Term, 1922

15th

This case being submitted, without argument, it is ordered by the Court, this day of February, 1922, that the same be and it is hereby referred to Alexander H. Robertson, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Carroll J. Bond

Report of Auditor and Master

Bill filed by husband against wife a vinculo matrimonii on the ground of three year's abandonment. Defendent summons no answer. Proof shows marriage residence, abandonment of three years continuous and without hope of reconciliation. Case ready for decree.

Alex. H. Robertson
Auditor and Master

✓
CIRCUIT COURT

B 642.

1921

No.

Docket

WELDON MONROE

VS.

CALLIE MONROE

Recorded

Folio 54 1922

Decree of Divorce

B No.

23236

8

fd.
14th Feb 1922.

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

Alon S. Robertson
Auditor and Master.

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

..... WELDON MONROE

VS.

..... CALLIE MONROE

..... MARCH

..... Term, 19..22..

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

It is thereupon, this 14 day of March, A. D. 1922 by the Circuit Court of Baltimore City, **Adjudged, Ordered and Decreed**, that the said

Weldon Monroe the above named Complainant be and he is hereby **DIVORCED A VINCULO MATRIMONII** from the Defendant, Callie Monroe

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

Carroll J. Bond