

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

B 67
1928

FLORENCE BOND

VS.

CHARLES BOND

B 32722

BILL FOR DIVORCE.

Mr. Clerk:

Please file.

Davis & Evans
ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

Feb 17 Feb 1928

FLORENCE BOND : IN THE CIRCUIT COURT
VS. : OF
CHARLES BOND : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

- (1) That she was married to her husband, Charles Bond on the 15th day of April, 1922 and with whom she resided until the 3rd day of October, 1923 when the defendant deserted the plaintiff.
- (2) That though the conduct of your Oratrix toward the said Charles Bond has always been kind, affectionate and above reproach, he has, without any just cause or reason, abandoned and deserted her and has declared his intentions to live with her no longer and said abandonment has continued uninterruptedly for more than three years and is deliberate and final and the separation of the parties is beyond any reasonable hope of reconciliation.
- (3) That your Oratrix has not lived or co-habited with the said defendant since said desertion.
- (4) That there are no children born as result of said marriage.
- (5) That both your Oratrix and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this Bill of Complaint.

(6) Your Oratrix is destitute and without means of financing the expenses of this suit and support for herself. She is advised by Counsel that she is entitled to have an order passed by this Honorable Court awarding her an amount as alimony pendente lite and a reasonable sum to compensate her Solicitors. The defendant is employed and earns about thirty dollars per week.

TO THE END, THEREFORE, YOUR ORATRIX PRAYS:

- (a) That she may be divorced A Vinculo Matrimonii from the said Charles Bond.
- (b) That she may resume her maiden name " NIXON".
- (c) Alimony pendente lite and counsel fee.
- (d) Such other and further relief as her case may require.

May it please your Honor to grant unto your Oratrix the Writ of Subpoena directed against the said Charles Bond, commanding and requiring him to be and appear in this Court on some day certain to be named therein to answer the premises and abide by and perform such decree or order as may be passed therein
AND as in duty bound, etc.

Louis H. Evans
ATTORNEYS FOR PLAINTIFF

P 595 ✓
Ct. Ct.

B-67
192 8 Docket No.

Florence Bond
vs.
Charles Bond

1437 - W. Bond of 3rd Ave
SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B-32722
(2)

Filed 6th Mch 1928

Davis & Evans SOLICITOR

P-13

Summoned and a leafy of the Process left with
the defendant.

(Keene)
2/5/28
John-E. Patee
Sheriff.
Fees \$0.95

FEB 17 1928 4 33 PM
THE SHERIFF'S OFFICE
BALTIMORE, MD

EQUITY SUBPOENA
The State of Maryland

EQUITY SUBPOENA

The State of Maryland

On Charles Bond

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 March next cause an appearance to be entered for you and your answer to be filed to the complaint of

Florence Bond

against you exhibited in the Circuit Court of Baltimore City, HEREOF fail not, as you will answer the contrary at your peril.

WITNESS, the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the 9th day of January 1928. Issued the 17th day of February, in the year 1928.

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.

B Docket 67
1928

CIRCUIT COURT.

FLORENCE BOND

vs.

CHARLES BOND

Order for Alimony

Pendente Lite

ORDER

B No. 32722

(3) (4)

Fd 17 Feb 1928
" " , March 1928

Fd:

DAVIS & EVANS

13

Now Est

John E. Potee Sheriff

copy of the within Order of Court served on Charles Bond
on the 5th day of March 1928. in presence of James E. Keene.

John E. Potee
Sheriff.

of the \$0.75

RECEIVED
FEB 17 1928 4 38 PM
CIRCUIT COURT
BALTIMORE CITY

IN THE
CIRCUIT COURT

OF
BALTIMORE CITY

January TERM, 1928

FLORENCE BOND

vs.

CHARLES BOND

ORDERED BY THE COURT this 17 day of February 1928

that the defendant Charles Bond

pay to the plaintiff Florence Bond

the sum of Ten

Dollars per week, during the continuance of this suit, accounting from the 17

day of February 1928 to the said plaintiff Florence Bond

as alimony, *pendente lite* unless cause to the contrary be shown on or before the 3

day of March 1928, provided a copy of this Order be served on the said defendant

Charles Bond on or before the 24

day of February 1928

Eugene O. Dunne

TRUE COPY—TEST:

CLERK

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this 1st day of March 1928, that the time for showing cause under said Order be extended to the 15 day of March 1928, and the time for service of a copy of the same be extended to the 8 day of March 1928.

Eugene O. Dunne

In the Circuit Court
Baltimore City

Florence Bond ^{B 67} 1928

vs

Charles Bond.

Answer to Order for
Alimony Pendente Lite

Mr. Clerk: ^{B 32722}

Please file, etc. ⁵

Harriet A. Drake,
Atty for Respondent.

Harriet A. Drake,

HARRILL DRAKE

ATTORNEY AT LAW

BALTIMORE, MD.

701 KATZ BUILDING

Filed 13th March 1928

Davis & Evans

Florence Bond
no

Circuit

B $\frac{67}{1928}$

Walter L. Wells

Charles Bond

Cr.

Feb. 17/28

Bill filed - alleges: 1) marriage; 2 & 3) abandonment 3 yrs; 4) no child; 5) P. res Balt 2 yrs. Provs: a) divorce a vinculo; b) maiden name, Nixon; c) a.p.l. & counsel fee; d) further relief

Mar. 5

D. summoned - R.D. Mar. 12

"

D. served with order nisi for \$10 per wk a.p.l.

Mar. 15

Answer to order nisi filed - says he ^{is} unable to comply therewith

Mar. 27

Answer to bill filed - admits #1, 4 & 5 - neither admits nor denies # abandonment.

Apr. 20

Order to take test.

June 18

Test. filed - proves allegations of bill

"

Submission for decree - Eq R. waives

"

Order of Ref.

Case ready for decree

P. to resume maiden name, Florence # Nixon
O.K.

Notified 6/18/28

Oct 23/29 - Bill prima to

67-1928

In the Circuit Court

of

Baltimore City

B-62

1928

Florence Bond

vs

Charles Bond

Answer to Bill of Complaint

Mr. Clerk -

B 32722

Please file, etc

Charles W. Wace

Solicitor for Defendant.

fd 27 Mch 1928

Florence Bond,

vs

Charles Bond.

(
)
(
)
(
)
(
)
(
)
)
In the Circuit Court

of

Baltimore City.

To the Honorable, the Judge of said Court :

The Answer of Charles Bond, the Defendant in the above entitled case, to the Bill of Complaint filed herein against him, respectfully shows : .

- (1) Your Respondent admits that he was married to the Complainant, in April, 1922, but as to the other allegations contained in the first paragraph he neither admits nor denies the same.
- (2) In answer to the allegations contained in the second paragraph your Respondent neither admits nor denies the allegations therein.
- (3) Your Respondent admits the allegations contained in the third, fourth and fifth paragraphs.
- (4) Your Respondent having no knowledge of the matters and facts of the sixth paragraph cannot either admit nor deny the same, except that he denies that he is earning the sum of \$30. per week.

Your Respondent having fully answered said Bill of Complaint, prays to be dismissed with his proper costs.

And as induty bound, etc.

Charles Bond

Respondent.

Harold J. Bruce,
Solicitor for Respondent.

67-1928

Circuit Court

B67
192 28

Docket.....

Lawrence Bond

vs.

Charles Bond

Papp

Petition for leave to take
Testimony and Order of
Court thereon

B No. 32722
(7)

Filed 20 April 1928

Florence Bond

vs.

Charles Bond

IN THE

Circuit Court

OF

BALTIMORE CITY

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

THE PETITION OF

plaintiff

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

Davis & Evans
Solicitor for *plaintiff*

ORDERED, this *20th* day of *April* 192*8*, 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.

Eugene O'Dunn

Doc. 68 B ⁶⁷/₁₉₂₈

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Florence Bond

vs.

Charles Bond

No. 32722 B

PLAINTIFF'S COSTS

19
Examiners \$

Copies

Sheriff

Stenographer

\$ _____

DEFENDANT'S COSTS

Examiners \$

Copies

Sheriff

Stenographer

\$ _____

Ad 18th June 1928

.....
Florence Bond
.....

vs.

.....
Charles Bond
.....
.....

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
twentieth day of April 1928, met on
the twenty-third day of April in the year nineteen
hundred and twenty-eight at my office, in the city of Baltimore, in the State
of Maryland, and assigned the twenty-fourth day of April
in the same year at one o'clock in the after-noon and the
office of Messrs. Davis & Evans 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 Solicitors of the
respective parties to take the following depositions, that
is to say:—

:

FLORENCE BOND : In the Circuit Court of

VS. :

Baltimore City.

CHARLES BOND :

Testimony taken before me, A. deRussy Sappington,
Examiner, in the offices of Messrs. Davis & Evans, in
Baltimore, on April 24th, 1928, at 1:00 P. M.

Mr. J. Stewart Davis appeared for plaintiff;
Mr. Walter I. Wells appeared for defendant.

- - -

Thereupon---

FLORENCE BOND,

the plaintiff, of lawful age, produced on her own behalf,
being duly sworn, testified as follows:

By the Examiner:

Q State your name, residence and occupation?

A Florence Bond, 242 Bowers Court, Baltimore,
domestic.

Q Do you know the parties to this suit?

A Yes, I am the plaintiff and my husband is the
defendant.

By Mr. Davis:

Q When, where and by whom were you married?

A On April 15th, 1922, in Baltimore, Maryland, by a Minister of the Gospel.

Q You and your husband lived together until when?

A Until October 3rd, 1923.

Q Which one of you left the other?

A He left me.

Q Why?

A I don't know, - he got bad and was running around.

Q Did he support you?

A No, sir.

Q Was he ever cruel to you?

A Yes, he beat me and cut me just for meanness.

Q What was your conduct towards him?

A I treated him well and was kind and nice to him.

Q Did you give him any cause or reason to leave you?

A No, sir.

Q Have you ever lived or cohabited together since he left you on October 3rd, 1923?

A No, sir.

Q Has his abandonment of you continued uninterruptedly since October 3rd, 1923?

A Yes.

Q Was his abandonment of you his deliberate and final act?

A Yes, sir.

Q Is there any hope of reconciliation between you?

A No, sir.

Q Have you been a resident of the City of Baltimore, State of Maryland, for more than two years prior to the filing of your Bill?

A Yes, I have lived here all my life.

Q Is your husband also a resident here?

A Yes, sir.

Q Are you asking for any alimony?

A No, sir.

Q Were any children born of the marriage?

A No.

Q Do you wish to resume your maiden name?

A Yes.

Q What is your maiden name?

A Florence Nixon.

(Cross examination waived.)

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*
----- *Florence Bond*

Thereupon---

HENRIETTA MOLDEN,

a witness, of lawful age, produced on behalf of the plaintiff, being duly sworn, testified as follows:

By the Examiner:

Q State your name, residence and occupation?

A Henrietta Molden, 242 Bowers Court, Baltimore, housewife.

Q Do you know the parties to this suit?

A Yes, Florence Bond is my sister.

By Mr. Davis:

Q Do you know your sister and her husband were married and lived together as husband and wife and were known in the community where they lived as husband and wife?

A Yes, sir.

Q When did they separate?

A On October 3rd, 1923.

Q Which one of them left the other?

A He left her.

Q Why did he leave her?

A Because he had another woman and was running around.

Q Did his wife give him any cause or reason to leave her?

A No, sir.

Q Was she always a kind, faithful and affectionate wife to him?

A She certainly was.

Q How did he treat her?

A Mean, - he always fought her and wanted her to work for him and he beat her and was always nasty to her.

Q Was his abandonment of her his deliberate and final act?

A Yes.

Q Have they ever lived or cohabited together since he left her on October 3rd, 1923?

A No, sir.

Q Has his abandonment of her continued uninterruptedly from that date to the present time?

A Yes.

Q Is there any hope of reconciliation between them?

A No.

Q Were any children born to them?

A No.

Q Have they both been residents of the City of Baltimore, State of Maryland, for more than two years prior to the filing of this Bill?

A Yes, sir.

(Cross examination waived.)

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. -----

76
Henrietta Molden

No other witnesses being named or produced before me, I then, at the request of the Solicitor ^s of the **respective parties** closed the depositions taken in said cause and now return them closed under my hand and seal, on this **eighteenth** day of **June** in the year of Our Lord nineteen hundred and **twenty-eight** at the City of Baltimore, in the State of Maryland.

A. de Russy Sappington (SEAL).
Examiner.

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

Defendant's **Exhibit**

A. de Russy 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 Russy Sappington
Examiner.

67
1938

Circuit Court

Docket _____

Florence Bond

Chales vs. *Bond*

SUBMISSION FOR DECREE.

Mr. Clerk,
Please file,

Oliver & Swan

Solicitor *S* for Plaintiff.

C 32722

No. *19*

Filed *18th* *June* 19*38*

Florence Bond

Charles Bond^{vs.}

In the Circuit Court
of Baltimore City

TERM, 19__

To the Honorable

Judge of Said Court:

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

Hans & Evans

Solicitor for Plaintiff,

Harriet A. Mues

Solicitor for Defendant.

Circuit Court

67
19 28 *B*

Docket No. _____

Florence Bond

vs.

Charles Bond

**Order of Reference
and Report**

B No. *32722*

4107

Order Filed *18th* day of *June* 19*28*

Report Filed _____ day of _____ 19 _____

Horne Bond

vs.

Charles Bond

IN THE
Circuit Court
OF
BALTIMORE CITY

Term, 192

This case being submitted, without argument, it is ordered by the Court, this 18th
day of June, 1928, that the same be and it is hereby referred to
Wm P. Lyons, Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.

Eugene A. Duane

Report of Auditor and Master

Bill for divorce a vinculo matrimonii, filed by the wife against
her husband on the ground of abandonment. Code Art. 16; Sec. 37-42.

Defendant summoned and answered.

Plaintiff's residence in Baltimore City for more than two years
prior to the filing of the bill proved.

The marriage proved.

Abandonment uninterruptedly for three years, its finality and the
irreconcilability of the parties proved.

Thirty days have elapsed since the filing of the bill.

Case submitted for decree and 41st General Equity Rule waived.

Case ready for decree.

William P. Lyons

Auditor and Master.

June 19, 1928

CIRCUIT COURT

B -67
1928 No. Docket

FLORENCE BOND

VS.

CHARLES BOND

Decree of Divorce

B No.

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

William P. Lyons
Auditor and Master.

Circuit Court

OF

BALTIMORE CITY

----- FLORENCE BOND -----

VS.

----- CHARLES BOND -----

----- Term, 192-----

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

It is thereupon, this ----- day of -----, A. D. 192-----

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said - - - - -

FLORENCE BOND - - - - -

the above named Complainant be and ^S he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, CHARLES BOND.

AND it is further ordered that the name of the Complainant, FLORENCE BOND, be and it is hereby changed to FLORENCE NIXON.

And it is further Ordered, That the said Defendant, CHARLES BOND, ----- pay the cost of this proceeding.