IN THE CIRCUIT COURT OF BALTIMORE CITY. EVELYN GREEN VS. THADDEUS GREEN BILL FOR DIVORCE Mr.Clerk: Please file. ewor bens Fd 29 Dec 192 DAVIS & EVANS ATTORNEYS AT LAW BAUMGARTEN & CO., INC.

## EVELYN GREEN

## IN THE CIRCUIT COURT

VS.

OF

BALTIMORE CITY.

THADDEUS GREEN

TO THE HONORABLE, THE JUDGE OF SAID COURT:

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:

Your Oratrix complaining respectfully represents: I. That she was married to her husband, Thaddeus Green on the 21st day of June 1916 and with whom she resided until the 17th day of March, 1927.

2. That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said Thaddeus Green.

3. That the said Thaddeus Green has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandomed women, whose names are unknown to your Oratrix and said offense has not been condoned by your Oratrix.

4. That your Oratrix has not lived or co-habited with the said defendant since she discovered his said adulteries.

5. That there is one child born as result of said marriage, James, age twelve years for whom the plaintiff prays custody.

6. That your Oratrix is a citizen of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this Bill of Complaint, but that the defendant is a non-resident of the State of Maryland and when last heard of was in Atlanta, Georgia. TO THE END, THEREFORE, YOUR ORATRIX PRAYS:

(a) That she may be divorced A Vinculo Matrimonii from the said Thaddeus Green.

(b) That she may have the custody of her child, James.

(c) That she may have such other and further relief as her case may require.

May it please your Honor to grant unto your Oratrix the Order of Publication directed against the said Thaddeus Green, 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.

ATTORNEY FOR PLAINTIFF

DAVIS & EVANS, SOLICITORS, 215 St.Paul Place, IN THE CIRCUIT COURT OF BALTIMORE CITY. EVELYN GREEN VS.THADDEUS GREEN ORDER OF PUBLICATION

The object of this bill is to procure a divorce a Vinculo Matrimonii by the plaintiff, Evelyn Green fromt the defendant, Thaddeus Green.

The bill states that the parties were married on the JIst day of June 1916 and lived together until the 17th day of March 1927. That ever since said marriage the plaintiff has behaved herself as a faithful, chaste and affectionate wife toward the said Thaddeus Green; that the said Thaddeus Green has on divers days and times since said marriage committed the crime of adultery with divers , lewd and abandoned women and said offense has not been condoned by the plaintiff; that the plaintiff is a resident of the State of Maryland but that the defendant is a non-resident of the State of Maryland and when last heard of was in Atlanta, Georgia. That the plaintiff has not lived or cohabited with the said defendant since she discovered his said adulteries.

It is thereupon ordered by the Circuit Court of Baltimore City this 29 day of Oscar 1928, that the plaintiff by causing a copy of this order to be inserted in some daily newspaper published in Baltimore City once a week for four successive weeks before the 30 day of January 1929, give notice to the absent defendant of the object and substance of this bill, warning him to be and appear in this Court in person or by Solicitor on or before the 15 day of January 1929 to show cause, if any he may have, why a decree should not be passed as prayed.

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482 B482 Ct. Ct. Docket 1929 Evelyn Green Thaddeus green. **Decree Pro Confesso** Japp. B No. 33 485 Filed 15 March 1929

[Decree Pro Confesso]

Erelyn

vs. deus

# IN THE CIRCUIT COURT

OF

BALTIMORE CITY

## Term, 192

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 state (said Order).

It is thereupon this 16 day of March, in the year nineteen hundred and twenty 10 day, 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 the 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.

Autre Chang

Retis July 2/20 CIRCUIT COURT DOCKET NO. 683 192 8 Evelyn Green vs. Thaddeus Green Order of Appearance Mr. Clerk, Please file. 0 Solicitor for Complainant. No. Filed 10 day of HI 192

Form 20 \_

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Evelyn Green	IN THE
	CIRCUIT COURT
<i>vs.</i>	OF
Thaddeus Green	BALTIMORE CITY
	May TERM, 1929
MR. WHITEFORD, CLERK:	
	Defendant. Complainant.
Arthur	E Striker
	C 1
	Solicitor. Plaintiff
Complainant	10
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T.D.	Doc. 68 3 1928	In the Circuit Court, of BALTIMORE CITY	DEPOSITIONS	Leen Leen Leen	No. 33485-B	PLAINTEPS BOSTS Examiners	Copies		DEFENDANT'S GOSTS Examiners \$\$	Stenographer &	3d 10 " July 1949	1 1 1
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Evelyn Green

VS.

## In the Circuit Court

Thaddeus Green

OF BALTIMORE CITY.

A Decree Pro Confesso having been passed in the above cause,

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 ..... day of..... March fifteenth fifteenth the..... hundred and twenty-nine at my office, in the city of Baltimore, in the State of Maryland, and assigned the fifteenth March .....day of..... ......o'clock in the .......after noon and the two in the same year at..... the Examiner in the City and State office of ..... 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 plaintiff .....to take the following depositions, that

is to say:---

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EVE LYN GREEN		In	τne	Circuit	t court	OT	
VS.							
THADDEUS GREEN	:		Ba	ltimore	Ci tar		
TIMDING GIGIN	:		200	TUTHOTO	or by .		
		-					 -

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Testimony taken before me, A. deRussy Sappington, Examiner, in my offices in the Title Building, Baltimore, on March 15th, 1929, at 2;00 P. M.

Mr. J. Stewart Davis appeared for plaintiff.

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Thereupon---

EVELYN GREEN,

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 Evelyn Green, 1425 West Franklin Street, housewife.

2 Do you know the parties to this suit?

A Yes, sir, I am the plaintiff and my husband is the defendant. By Mr. Davis:

Q When, where and by whom were you married?

A We were married by a Priest at Saint Francis Church in Baltimore, on June 21st, 1916.

Q And you resided with your husband until when?

A Until March 17th, 1927.

Q What was your conduct towards your husband?

A I was faithful to him and did my duties as a wife.

Q Were you a kind, faithful and affectionate wife?

A Yes, sir.

Q Did you give him any cause or reason to be unfaithful to you?

A No, sir.

Q You charge your husband with the crime of adultery. Tell what you know about that?

A I had been suspicious for some time, but couldn't get anything definite on him and when I asked him he said no.

Q Whom did you suspect?

A Hazel Chase. I had seen him and her driving in the car and talking to her.

Q After the separation did you discover anything?

A In looking over his personal effects I came across these letters you have there. Q I have here six letters. Are these all the letters you found?

A No.

2 About how many did you find?

A About fifty.

Q All to your husband?

A Yes.

(NOTE- Letters filed with the Examiner, marked "Plaintiff's Exhibit, Examiner's No. 1").

A fter the separation what happened to him?A He was sent to Atlanta. That's what caused

the separation.

Q After the separation were you advised by other persons that they had seen him under adulterous conditions?

A Yes.

Q Have you lived or cohabited with your husband since learning of his adulteries?

A No, sir.

Have you forgiven or condoned his offense?
A No.

Q Were any children born as a result of the marriage?

A One child, James, twelve years old.

Q Do you want the custody of the child?

A Yes, sir.

Q Are you a resident of Baltimore, Maryland, and have you been for more than two years prior to the filing of this Bill?

A Yes, sir.

Q Is your husband a resident of Maryland?

A No, sir.

Q Where was he when you last heard of him?

A In Atlanta, Georgia.

Q Do you want any alimony for the support of yourself or the child?

A No, sir, I don't care for any.

. . . . .

### 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.

same fully and at large in your answer.

Erelyu Greene

Thereupon---

#### MYRTLE COCKRELL,

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

By the Examiner:

2 State your name, residence and occupation.

A Myrtle Cockrell, 1423 West Franklin Street, housework.

2 Do you know the parties to this suit?

A Yes, sir.

By Mr. Davis:

2 Do you know they lived together as husband and wife and were known and recognized in the community where they lived as husband and wife?

A Yes, sir.

Q What was the conduct of Mrs. Green towards her husband?

A She treated him very nice whenever I was there; she was always very affectionate and nice to him.

2 Did she give him any cause or reason to be unfaithful to her?

A No, sir.

2 She has charged her husband with adultery. What do you know of that?

A I saw him with a girl on Myrtle Avenue, going into a house.

2 When was that?

A Around March 1st, 1927.

2 Do you know who the girl was?

A Hazel Chase.

Q Where was the house?

A In the 1500 block, near the Pratt Library.

Q What is the reputation of that house?

A A bad house, it has been raided several times.

Q Do you mean a house where a man and woman not married can go for a room for immoral purposes?

A Yes, sir.

Q And you saw him enter the house with Hazel Chase?

A Yes, sir.

Q And you know this particular house?

A Yes, sir.

Q Did they stay in there long enough to do what men and women do in those houses?

A Yes, they were in there over a half hour.

Q Did you tell Mrs. Green of this after the separation?

A Yes, sir.

Q Has Mrs. Green lived or cohabited with her husband since learning of that adultery?

A No, sir, she couldn't because he has been in Atlanta.

Q Do you think Mrs. Green is a fit and proper person to have the care and custody of the child?

A Yes, sir.

Q Has Mrs. Green been a resident of Baltimore, Maryland, for more than two years prior to the filing of this Bill?

A Yes, sir.

Q Is her husband a resident of Maryland?

A No, sir, he is in Atlanta.

- - - -

#### 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. 20

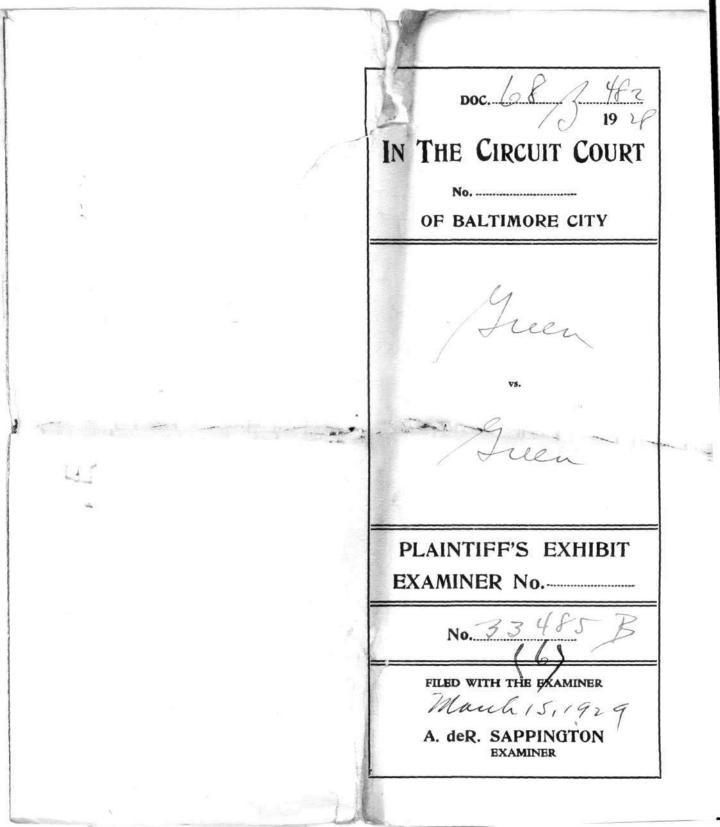
Mystus Cocknell.

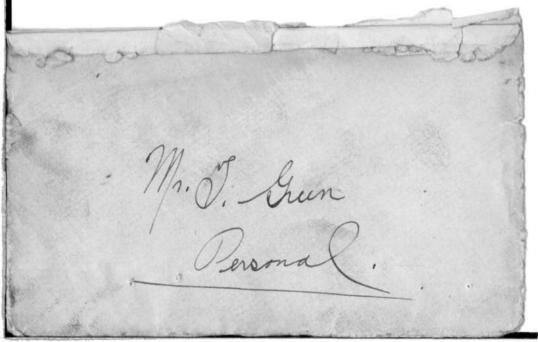
No other witnesses being named or produced before me, I then, at the request of the Solicitor......of the <u>plaintiff</u> closed the depositions taken in said cause and now return them closed under my hand and seal, on this <u>tenth</u> day of July in the year of Our Lord nineteen hundred and <u>twenty-nine</u> at the City of Baltimore, in the State of Maryland. City of Baltimore, in the State of Maryland.

There The is one Exhibits with these depositions, to wit: Plaintiff's Exhibit, Exeminer's No. 1. Defendant's..... Exhibit ..... Eccles Doppsug try 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

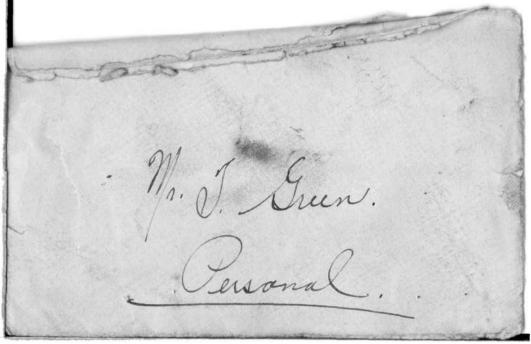
Ceder Shappington Examiner.



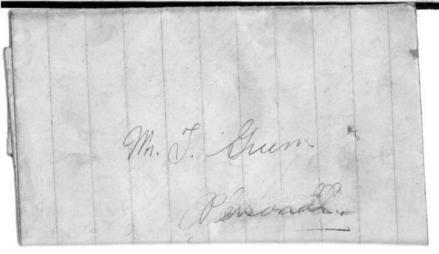




1. J. Gran. Personal







568 St. Mary's St. Baltimou, Md. let 18/22. my darling find: " lam witting this note in one of my Study period as I know Sw on it see you to night as am so sick my back is almost killing me and my stomach is hutting also so if you dont see me anymou you know am in ted. Twas Rick when Igot up this but would not say anything to my mother have a Chill in School and the murse qu'en me some medicino ao luas faling a little better than but now am mate wase Thave ten chying all day But hope this will find you well. Weeley is comming down to night but am not going to see him ...

close with million of kisses. Hazzel. P. S. Klease excuse bad withing as am so sick. Dear did you find my fountain Then I think lift it in your can yesterday when Slift you . So Sweethiast of your dont see me phase bout stop thinking about me .

Mr. J. Green. Lersona

Raltimore, Md. Cct. 01, 1930 . Daddy Guen: I was so glad when you can down to see me that I did n't know what to do you clast Know now good that made me Leel. Sure theast Salways hid in Led and think about that. Monday might up Billie house and wish for you to be here in the had with me ha ha have you been loving since feensick

How much I miss Kand I did not realy think that I care that much for you until now. Sheen half Jalutays ack your if you love me, know what make me I do that is I think you think that lam younger and cam stay out late like the other girls that you we to go around with and that is the robon I think that the your Just care a little for me I might he thinking forong I hope am But you treat me fine & don't know what make me think because some one told me that your like women's the fest. I lease don't think hand of me saying that, lovenest my for is hurting me so bad that is the reason that I can write more phase Lorgive as pose Swill Le able to with more next time Close with Oceans " kieses and

Seas I love 1 you wife × " (n. Hail Ha' Mrs Hazel Green lord how do you like this ? P.S. Evelyn It to see this distroy after Mading and answer at on ce look over all mistake as the children are in here while lam writting clease sent me one of your picture so that learn have something to look at

Baltin 14 . Der. e Daddy Green : The reason Solidn't give. you that note Swrote was because I told Katie what I had to tell your Darling I am going up to see Welley Grandnother as she did Saturday maindog and he ask me to come up and stay au hile with them Sweetheast what are your doing all dress up to day my your look to me. Listen baby please see me to night as swant to see your because didn't see you saturday night es will see you to night about 8,00 half part on Myster are night on the Corner where Wesley live : Wile .

Mr. J. Sun. . Personal.

Nov; 6,1922.

Daddy: Honety Iwas so glad to see your as Suas so glad as I cry when your left as I didn't want to see your go, and when you kisses me Sthought Junded died as I haven had a kies Er long as Sknow if getone I those long know would go crazy. James if had a little loving Swould get will I wish your could come down

And give it to me as could love you all night and day as am just going nuts about you am not papky until hear a see you. Their you may not think so het would be any thing on this earth for your as realy do love you, Honety for god sake please dont do any things to hurt me I mean to go around with some one else because when Iget will he long to your

and know one else. you might think Isaying this Just to be write, But the Lord know that this is the two and other else. Sweetheast know you think that Wesley and Some doing comething that are haden got any husines doing hit I can take am Othe to that; So please

Donling don't thinks bad things about me as Sam caving all my love and everything for your and nant you to do the same Igues you and Evenlyn are doing comething every night what do you think about that forgot to tell you that cheaning last night that we where married and had the pretties little laky gil you most every see, I wish that was to.

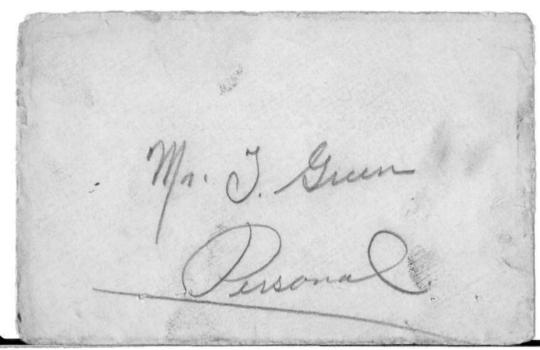
apple pie what do you think about what I say about that has cheamin when I get well litus get married and go to New York to hive I guess your dailing Ha! Ha! guess will Close now wish manykinses that you are going to get to morrow when you Come down to see me Wife .

Baltim are, M. . Nov 9, 1922. Swat dady: what I did with that picture I your well I put it in the locket that Weeley gave me and all day dong thave been talking and kissing it It is Just like you think and other thing we haven got any rato a hid hugo de you get me I think to much of the picture

Then that . Sweetness an glad you did coursed the cub out as don't let know one get any thing on your, When you see Billie againgire him my test regard and tell him will sei him soon. and lam senting you it if you wanted it if not throw it away. you did sag if you got your chewing gun last night that senteryour.

There was some guils down my hence to day, the teacher wanted to know if luno comming back a not so I told them to tell her that would trid and come back Monday Imiss you so much Sam glad got something to look at I your. Did you give trelgn any.

This morning my mother didn't get back until 130 mas so souried that you have didn . I have long to stay as thought you would .. Baby will close now but will trud and write more to night. Close with all the kieses in the world. e Mife. P.S. Weeley kies me last night and I wijer it off and he said what make you do that I told him that I didn't want his kieses.



Mor; 7. 1926. /-Deaust Honey : your little was received and was very glad to hear from you. But was surprise to hear from you as soon as did. as Juan't looking to hear from your until Tuesday. Sam chazy about that color ink becaused it is in our name, Sam souried that your was in misery when you where down my house but hope the nept time you come down that you will not te that way. you said that you

Didn't have any hisiness down them yes your did because your cam to see your loving wife ion't that so in your arms and let your hold and kisses me, yes sweetheart you must have patiention because when I get well fuill give you any thing you want. Baby famil that you had the blues, Sweetness I don't want you to novied about me and having your eyes sat back in your head as that

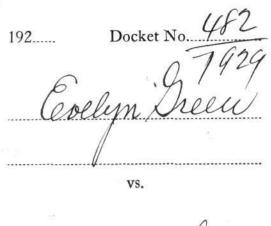
Will make me feel sick so I dont want you to have the these any more. Dont worried dear Suillzeren turn your down for know one at not even my mother as she couldn't turn me from your. yes darling your trust me and I thust your , Sweet hunch of flower Idon't know how it felt when the baby was boen "Ha! Ha! Is that all you want to tenow

Baby Swould trust your any where yes lit us go to New york when get well. you are not heing when you say that Eve was sick and suffering from stomach -trouble Sam souried for here for Iques it is you that cost all this trouble, Swill close now and will let you know if mame is going out and want your to come down and git you busia that peromise you . Wife.

568 St. May & St. Baltimore, Md. Dec. 1, 1922. Daddy Green: Darding am offul sourid that Scould see your to night as know your had a good time only wish that could had gone with your. Baby you don't know what a hard time I am having it seem as it is getting harder and harder, my mother said to day if I have any thing to do with for me to take me things and get out, your know that is hard isn't it. Sweitheast Sidn't get home until 10 34 oclock she though that had been out with you but my girl fund can hame with me so that made it all right, went down town and then went to the Regent it was gright good. Saw some fellow

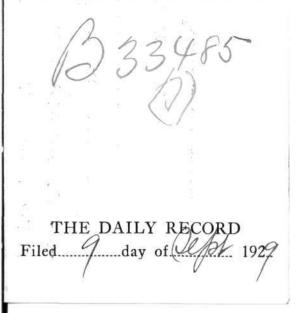
Up on the and and they said " then goes Green's sretty manand and it made me laugh so they say isn't? that so but didn't stopped. Baby am morried to death I don't feel the myself anymore, heally don't know what to de as am not going to give your up for knowlody Solont care how hot they makes it for me. I your where only sinlar Should leave my home for your But as it is now Popaid to go any place with your Chitty papa if would have home what would you do would you come with me ar letay with Ere apple pic think have got as other cold from last night because

When I can home Quas so cold I could hardly make it up stains I got Elizabeth to put some water in the hot water both and then put it to my fut The auchile I felt a little better Darling if I can I will trud hand to see your sunday if not I will su you and we will go go up a gil house I know on Wilson Sheet 560. Whatwould your mantime to do tried to come out Sunday or see your Monday night as think my flag will be up and I will see your go Ha! Ha! Baby will clise nouve usish your million of kisses wife (2) P. S. Please excuse bad writing as lam so slupy that cann't su,



haddens x

## Certificate of Publication



## THE DAILY RECORD

Davis & Evans, Solicitors, 215 St. Paul Place.

IN THE CIRCUIT COURT OF BALTI-MORE CITY - (B-482-1928) - Evelyn Green vs. Thaddeus Green.

ORDER OF PUBLICATION. The object of this bill is to procure a divorce a vinculo matrimonii by the plaintiff, Evelyn Green, from the defendant, Thaddeus Green.

Thaddeus Green. The bill states that the parties were married on the 21st day of June, 1916, and lived together until the 17th day of March, 1927. That ever since said marriage the plaintiff has behaved herself as a faithful, chaste and affectionate wife toward the said Thaddeus Green; that the said Thaddeus Green has on divers days and times since said marriage committed the crime of adultery with divers lewd and abandoned women, and said offense has not been condoned by the plaintiff; that the plaintiff is a resident of the State of

Maryland, but that the defendant is a nonresident of the State of Maryland and when last heard of was in Atlanta, Georgia. That the plaintiff has not lived or cohabited with the said defendant since she discovered his said adulteries.

It is thereupon ordered by the Circuit Court of Baltimore City, this 29th day of December, 1928, that the plaintiff, by causing a copy of this order to be inserted in some daily newspaper published in Baltimore City once a week for four successive weeks before the 30th day of January. 1929, give notice to the absent defendant of the object and substance of this bill. warning him to be and appear in this Court, in person or by solicitor, on or before the 15th day of February, 1929, to show cause, if any he may have, why a decree should not be passed as prayed.

EUGENE O'DUNNE. True Copy-Test:

d31,ja7,14,21 CHAS. R. WHITEFORD, Clerk.

Baltimore, Jan 2/Si We hereby) certify that the annexed advertiselication Circuit Court ment of Order..... .....of Baltimore City, Case of..... ren oM. was published in THE DAILY RECORD, a daily newspaper published in the City of Baltimore, once in each of our successive weeks before the ay of January, 1927 First insertion ....

THE DAILY RECORD

**Circuit** Court Docket No.\_ Evelyn Green VS. Thaddeus Green **Order of Reference** and Report MS B No. 33485. Order Filed // day of 26/24 1929 Report Filed // day of 26/24 1929

Evelyn, Green	
	IN THE
	Circuit Court
vs.	\ \
Thaddeus Green	OF
	BALTIMORE CITY
	SAL D.
	Term, 1929
This case being submitted, without argument, it is	ordered by the Court, this// //k
day of september, 192	
	/
pleadings and the facts, and his opinion thereon.	pulling
Report of Audito	r and Master
Bill for divorce a vinculo matrim	onii and for the custody of the
inor child of the parties filed by the	wife against her husband on the
round of adultery. Code, Art. 16, Sec	s. 37 - 42.
Defendant proceeded against as a	non-resident and his non-residence
proven.	
Plaintiff's residence in Baltimor	
proven.	
The marriage proven.	
The adultery proven.	
THE AUNTOELY PLOYEN.	

Case made for giving the custody of said child to plaintiff.

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

Case ready for decree.

C14 Auditor and Master September 16, 1929

CIRCUIT COURT The within is a proper decree to be passed in this case Ward B. Eus B 482 1928 No. Docket Auditor and Master EVELYN GREEN VS. THADDEUS GREEN heoorded. 22/10 22 1009 Decree of Divorce B No. 33485 Fd 19 Sept 1929

DECREE OF DIVORCE.

IN THE

## **Circuit Court** EVELYN GREEN OF VS. BALTIMORE CITY, htruleco 'erm, 192, 9 THADDEUS GREEN This cause standing ready for hearing and being duly submitted, the proceedings were by the Court read and considered. It is thereupon, this 19th day of 1-14 Touched, A. D. 1929 by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said - -EVELYN GREEN the above named Complainant be and She is hereby DIVORCED A VINCULO MATRIMONII from the AND IT IS FURTHER ORDERED that said complainant shall have the custody and guardianship of James Green, the minor child of the parties in the proceedings mentioned until further order of this court. - - - -

schethard