

3/12/1920

In The Circuit Court  
of B 144  
Baltimore City

John Albert 1920

vs

Katie Albert

Bill for James A. Muncie

Not Cash please file

(Signature)

\$20937

(1)(2)

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BALTIMORE, MD.

Ag March 1920

John H. Albert

In The Circuit Court

vs.

of

Hallie R. Albert

Baltimore City.

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To The Honorable, The Judge of Said Court:

Your Orator, complaining, respectfully says:

FIRST, That the parties hereto were married in Merchantville N.J. by a Presbyterian minister, by the name of Rev. Clarke; on or November 9th. 1913, and lived together as man and wife until on or March 1st. 1914.

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 a non-resident of the city and state and when last heard of, was in Washington, D.C.

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 him, and has declared her intentions to live with him no longer; that such abandonment has continued uninterrupted<sup>ly</sup> 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, that he has never co-habited with the said respondent since the said desertion.

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

WHEREFORE YOUR ORATOR PRAYS:

-a-A divorce a vinculo matrimonii from the defendant.

-b-Such other and further releif as the case may re  
quire.

May it please Your Honor, to grant unto Your Orator,  
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.

*John Albert*  
-----  
Complainant

*C. Stewart Jones*  
-----  
Solicitor for Complainant.

State of Maryland     )  
                                  ) To Wit  
Baltimore City         )

I hereby certify that on this *9<sup>th</sup>* day of *Mar* 1920, be-  
fore me the subscriber, a notary Public in and for Baltimore ~~City~~ <sup>County</sup>,  
State of Maryland, personally appeared John H. Albert, the com-  
plainant 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  
his knowledge and beleif.

*Arthur H. Rogers*  
-----  
Notary Public.

J. Steward Davis, Solicitor

118 E. Lexington St.

In The Circuit Court of Baltimore City.

John H. Albert Vs. Hallie R. Albert.

ORDER OF PUBLICATION.

The object of this suit is to procure a decree for a divorce A VINCULO MATRIMONNII, by the plaintiff from the Defendant.

The Bill states that the parties thereto were married in Merchantville N.J. on or about the 9th. day of November 1913 and lived together as man and wife until on or about March 1st. 1914. 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 respondent is a non-resident of the city and when last heard of was in Washington D.C. That though the conduct of your Orator toward his wife has always been kind, affectionate and above reproach. She without any just cause or reason abandoned and deserted him, and has declared her intentions to live with him no longer; 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. That there are no children born as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City, ordered this <sup>9</sup> day of <sup>March</sup> 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 <sup>9</sup> day <sup>April</sup> 1920; and give notice to the said defendant, Hallie R. Albert (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 <sup>26<sup>th</sup> of April</sup> day, 1920 to show cause if any he may have why a decree should not be passed as prayed.

Robert F. Sawyer

144  
1920 *1360* Docket No. ....

*Albert*

*Albert*

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Certificate of Publication

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*B 70737*

*(3)*

THE DAILY RECORD.

Filed *28* day of *June* 192*0*

# THE DAILY RECORD

Baltimore, MAR 31 1920, 192

### Fourth Insertion.

J. Steward Davis, Solicitor,  
118 East Lexington Street.

IN THE CIRCUIT COURT OF BALTI-  
MORE CITY—(B-144-1920)—John H.  
Albert vs. Hallie R. Albert.

### 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 Merchantville, N. J., on  
or about the 9th day of November, 1913,  
and lived together as man and wife until  
on or about March 1st, 1914. That the  
plaintiff is a resident of the City of Balti-  
more, State of Maryland, and has been  
for more than two years prior to the filing  
of this bill of complaint. That the re-  
spondent is a non-resident of the city and  
when last heard of was in Washington,  
D. C. That though the conduct of your  
orator toward his wife has always been  
kind, affectionate and above reproach. She  
without any just cause or reason aban-  
doned and deserted him, and has declared  
her intentions to live with him no longer;  
that such abandonment has continued un-  
interruptedly for more than three years,  
prior to the filing of this bill of com-  
plaint and was deliberate and final, and  
beyond and reasonable hope or expectation  
of reconciliation. That there are no chil-  
dren born as a result of said marriage.

It is thereupon by the Circuit Court of  
Baltimore City ordered, this 9th day of  
March, 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 9th day of  
April, 1920, and give notice to the said  
defendant, Hallie R. Albert (now absent),  
of the object and substance of this bill,  
and warning her to be and appear in this  
Court, in person or by solicitor, on or be-  
fore the 26th day of April, 1920, to show  
cause, if any she may have, why a decree  
should not be passed as prayed.

ROBERT F. STANTON.

True copy—Test:

CHAS. R. WHITEFORD,

m10,17,24,31

Clerk.

We hereby certify that the annexed advertise-

ment of Order

*Publication* Circuit Court

of Baltimore City, Case of

vs.

was published in THE DAILY RECORD, a daily

newspaper published in the City of Baltimore, once in

each of *four* successive weeks before the

*9th* day of *April*, 1920

First insertion *March 10th*, 1920

THE DAILY RECORD.

P&T

*Thaddeus Crapster*

144  
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Docket  
Ct. Ct.

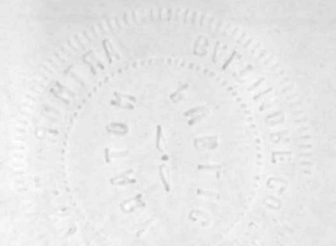
John Albert  
vs.

Hallie Albert

**Decree Pro Confesso.**

20737  
No.  
(4)

Filed 28 June 1920



John Albert

vs.

Hattie Albert

IN THE  
Circuit Court  
OF  
BALTIMORE CITY.

January 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 ~~writ~~, (said Order).

It is thereupon this 28<sup>th</sup> day of April 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 F. Clanton

STATE OF MARYLAND,  
BALTIMORE CITY, SCT :

I hereby certify that on this 27<sup>th</sup> day of April 1920 before me, the subscriber, a Notary Public, of the State of Maryland, in and for the City aforesaid, personally appeared John Albert 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 N. Rogers  
Notary Public.

John H. Albert



3/12/15

Docket B. 144/1920

IN THE CIRCUIT COURT

John H. Albert

vs

Hallie R. Albert

DEPOSITIONS

12 No. 207-37

PLAINTIFF'S COSTS

Examiner.....	\$ 8.00
Copies .....	
Notices .....	
Sheriff .....	
Stenographer .....	1.50

\$ 9.50 paid.

DEFENDANT'S COSTS

Examiner.....	\$
Copies .....	
Notices .....	
Sheriff .....	
Stenographer .....	

\$

ALFRED J. CARR, Examiner

Filed 11 day of May 1920

John H. Albert

vs.

Hallie R. Albert

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 28th day of April 19 20, met on the 30th day of April in the year nineteen hundred and twenty at my office, in the City of Baltimore, in the State of Maryland, and assigned the 6th day of May in the same year at one 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:—

JOHN H. ALBERT, the plaintiff produced in his own behalf, being duly sworn, deposes and saith as follows:

BY THE EXAMINER:

1Q. State your name, residence and occupation.

A- John H. Albert, 920 Argyle Avenue, Baltimore, and I am a Photographer.

2Q. Who are the parties to this suit?

A- I am the Plaintiff, and Hallie R. Albert is my wife, the defendant.

BY MR. DAVIS:

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

A- On November 9th, 1913, at Merchantville, New Jersey, by the Rev. Mr. Clarke, a Presbyterian Minister.

4Q. How long did you and your wife live together?

A- Until March 1st, 1914.

5Q. Have you or not been a resident of the City of Baltimore, State of Maryland, for more than two years prior to March 9th, 1920?

A- Yes, over four years.

6Q. Is your wife now or was she when this bill was filed, a resident or a non-resident of the State of Maryland?

A- She was and is a non-resident.

7Q. Why do you say she is a non-resident of the State of Maryland?

A- Because she never lived here to my knowledge, and does not live in Maryland now.

John H. Albert

8Q. Where did you last hear of her?

A- In Washington, D. C.

9Q. What was your conduct and treatment towards your wife during the whole of your married life?

A- I was a good husband, and provided for her, and was faithful to her.

10Q. What was her conduct and treatment towards you?

A- She would go and come whenever she pleased. She would stay out at nights. She neglected the home. When I came home from work, I never knew whether I would find her there or not.

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

A- She left me on March, 1st, 1914.

12Q. What occurred on the day she left you?

A- I went to work in the morning, and when I came home she was not there, and never came back. She had been away several times before that, but she always came back. She would give no excuse whatever for leaving on the previous occasions.

13Q. Did you give her any cause to leave you?

A- None.

14Q. Where did this separation take place?

A- In Philadelphia.

15Q. Have you seen her or had any conversation with her since she left you?

John H. Albert

A- Yes, I saw her in Washington, D. C. about a year ago.

16Q. Did you have any conversation with her?

A- I asked her to return home and live with me, and behave herself, and I promised to provide for her, but she positively refused to do so. She said she was working and getting along all right, and she could do as she pleased.

17Q. Has the abandonment of you by your wife continued uninterruptedly for at least three years prior to March 9, 1920?

A- Yes, over five years.

18Q. Was it deliberate and final on her part?

A- Yes, it was. She had no reason to leave me.

19Q. Is there any hope or expectation of a reconciliation?

A- None whatever.

20Q. Have you ever lived with or cohabited with her since she left you?

A- No.

21Q. Were any children born of this marriage?

A- None.

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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 H. Albert*

JOHN M. BROWN, 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,

A- John M. Brown, 1951 Third Street, Northwest, Washington, D. C., and I am a Government Employee.

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

A- I know them both. The Plaintiff is my brother-in-law. I married his sister. The Defendant is Mr. Albert's wife. I have known her since the marriage.

BY MR. DAVIS:

3Q. Do you know if they are man and wife?

A- Yes, they are.

4Q. And they lived together as man and wife in Philadelphia?

A- Yes.

5Q. Did you visit them there?

A- Yes.

6Q. Was their reputation in the community in which they lived that of being a married couple?

A- Yes.

7Q. When did they marry?

A- On November 9th, 1913.

8Q. And they lived together how long?

A- Until March 1st, 1914.

John M. Brown

9Q. From your observations by visiting them, what was the conduct and treatment of Mr. Albert towards his wife?

A- Good. He provided for her, and as I saw it, he was a good true loving husband.

10Q. What was her conduct and treatment towards him?

A- She would slight him, and did not seem to care much for him, and neglected their home. She would go and come as she pleased.

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

A- She left him on March 1st, 1914.

12Q. How do you know that?

A- I visited his house shortly after she left him, and he told me that his wife had left him without any cause whatever.

13Q. Have you ever seen her since?

A- Yes.

14Q. Did you have any talk with her about going back to her husband?

A- Yes.

15Q. What did she say?

A- She said she would not go back to him, and she preferred to live by herself, so she could do as she pleased.

16Q. Is the Plaintiff a resident or a non-resident of the City of Baltimore, State of Maryland?

A- He is a resident and has been such over two years.



John M. Brown

17Q. Is she a resident or a non-resident of the City of Baltimore, State of Maryland?

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

18Q. Why do you say that?

A- Because I know she lives in Washington, D. C., and does not live in Maryland, and has not been in Maryland.

19Q. Has the abandonment of the Plaintiff/continued un-  
by the defendant  
interruptedly for at least three years prior to March 9th, 1920?

A- Yes, it has continued over five years.

20Q. Was the abandonment of the Plaintiff by the Defendant her own deliberate and final act?

A- Yes, it was.

21Q. In your opinion, is there any reasonable hope or expectation of a reconciliation?

A- No.

22Q. Where any children born of this marriage?

A- No.

23Q. Do you know whether or not the plaintiff has lived with or cohabited with his wife since she abandoned him?

A- No, he has not.

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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 M. Brown.*

CHARLES E. JAMES, 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.

A- Charles E. James, 916 S Street, Northwest, Washington, D. C., and I am a Government employee.

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

A- Yes, I know them both. I have known him all my life, but I have known her only since the marriage?

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 know they were married in New Jersey on November 9th, 1913 by a Minister of the Gospel. And they lived together as man and wife until March 1st, 1914.

4Q. Has the Plaintiff been a resident of the City of Baltimore, State of Maryland, for more than two years prior to March 9th, 1920?

A- Yes.

5Q. Is or not Mrs. Halle Albert a resident or a non-resident of the State of Maryland?

A- She is a non-resident.

6Q. Why do you say that?

A- Because I know she lives in Washington, D. C., and has lived there for several years.

Charles E. James

7Q. You visited Mr. and Mrs. Albert when they lived together, did you not?

A- Yes, I did.

8Q. From your observations, what was his conduct and treatment towards his wife, as you witnessed it?

A- Good. He was a kind, affectionate and faithful husband to his wife, and provided for her, and made her a good living.

9Q. How did she treat him?

A- It seemed to me as if she did not care for him or for the home. She neglected the home. She liked to run around.

10Q. When did they separate and which one left the other?

A- She left him on March 1st, 1914.

11Q. How do you know that?

A- Because I visited him shortly after she left, and he told me his wife had left him. I did not see her around the house, and he was living alone.

12Q. Has the abandonment of the Plaintiff by the defendant continued uninterruptedly for at least three years prior to March 9th, 1920?

A- Yes, over five years.

13Q. Was it her own deliberate and final act?

A- Yes, it was.

Charles E. James

14Q. In your opinion, is there any reasonable hope or expectation of a reconciliation?

A- No.

15Q. Were any children born as a result of this marriage?

A- No.

16Q. Has he lived with or cohabited with his wife since she left him?

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*

*Charles E. James*

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 16th day of May in the year of our Lord nineteen hundred and twenty at the City of Baltimore in the State of Maryland.

Alfred J. Carr   
Examiner.

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

Defendant's          Exhibit         

Alfred J. Carr  
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         .

Alfred J. Carr  
Examiner.

Circuit Court

144  
19 70

Docket No. ....

John Albert

vs.

Walter Albert

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Order of Reference  
and Report

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19 70 737  
No. 267

Order Filed 25<sup>th</sup> day of May 19 70

Report Filed ..... day of ..... 19 ..



John Albert

vs.

Halle Albert

IN THE  
Circuit Court

OF

BALTIMORE CITY

May

Term, 19 20

This case being submitted, without argument, it is ordered by the Court, this 25<sup>th</sup> day of May, 1920, that the same be and it is hereby referred to Ward Blevins, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Robert F. Staunton

Report of Auditor and Master

Bill for divorce a vinculo matrimonii filed by the husband against his wife on the ground of abandonment. Code 1911, Art. 16, secs. 36-41.

Defendant proceeded against as a non-resident and her 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.

Ward B. Clevins

Auditor and Master.

Fee \$9 paid.

May 29th, 1920.

✓ 119

# CIRCUIT COURT

B--144-

1920.

No. 60 Docket

JOHN H. ALBERT

VS.

HALLIE R. ALBERT.

## Decree of Divorce

B No. *B 20737*

*(7)*

*fd 8 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

JOHN H. ALBERT

VS.

HALLIE R. ALBERT

Term, 1920.

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

It is thereupon, this 8<sup>th</sup> day of July, A. D. 1920, by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said John H. Albert

the above named Complainant be and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, the said Hallie R. Albert.

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

*Morris H. Spivey*