

B 176/1919

IN THE CIRCUIT COURT  
PART 2 OF  
BALTIMORE CITY.

William Edward Boyd

VS.

Amelia Boyd.

Bill for Divorce,  
A Vinculo Matrimonii.

Mr. Clerk:-

Please file &c.,

No 18091 B

Raymond

Sol. for Plaintiff.  
215 Courtland Street.

William Edward Boyd \*

VS. \*

Amelia Boyd \*

IN THE CIRCUIT COURT

PART 2 OF

BALTIMORE CITY.

To the Honorable, the Judge of said Court:

Your Orator complaining respectfully says:

FIRST: That the parties hereto were married in Baltimore City, State of Maryland, on or about the 2nd day of February 1914, and lived together as man and wife until on or about the 15th day of August 1915.

SECOND: That though the conduct of your Orator towards his said 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 more; that such abandonment has continued un-interrupted for more than three years and was deliberate and final, and the separation of the parties is beyond any reasonable hope or expectation of a reconciliation.

THIRD: That both parties are residents of the City of Baltimore, State of Maryland, and have been for more than two years prior to the filing of this Bill of Complaint.

FOURTH: That there is one minor child as the result of said marriage. Beatrice E. Boyd, aged five years.

WHEREFORE YOUR ORATOR PRAYS:

- a- A divorce, A Vinculo Matrimonii, from the defendant.
- b- The care and custody of said minor child.
- c- Such other and further relief as the case may require.

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

As in duty bound, &c.,

William Edward Boyd.  
Plaintiff.

R. M. Bond.  
Solicitor for Plaintiff.

162 LN

Ct. Ct. No. 2

176  
1919

B

Docket No. 78

Boyd

vs.

Boyd  
220 W. Hamburg St.

Subpoena to Answer Bill of Complaint

Pro

No. 18091 B  
2

Copy - copied

Filed

May  
Roy D. Bond

1919

Solicitor.

SP4488 8

Summoned and a copy of the Process left  
with the defendant

Thomas S. McKully  
Sheriff

(Bunn)  
Fees \$0.50

EQUITY SUBPOENA  
The State of Maryland

To

*Amelia Boyd*

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you be in your person before the Circuit Court No. 2 of Baltimore City, at the Court House in said city, on the second Monday of

*May*

, 191*9*, to answer the complaint of

*William Edward Boyd*

against you in said Court exhibited.  
HEREOF fail not, as you will answer to the contrary at your peril:

WITNESS, the Honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the

*10<sup>th</sup>*

day of

*March*

, 191*9*

Issued the

*30<sup>th</sup>*

day of

*April*

, in the year 191*9*

*John Pleasant*

Clerk.

NOTICE TO THE PERSON SUMMONED:

“Personal attendance in Court on the day named in the above Writ is not required; but unless within such number of days thereafter as the law limits, legal defense is made to the above mentioned suit a judgment by default may be entered against you.”

Ct. Ct. No. 2

1919 DOCKET No. 38

William Boyd

vs.

Amelia Boyd

ORDER FOR APPEARANCE.

Mr Clerk please file

(Horn) Jan  
Act. for defendant  
No. 18091 B  
9

File 2nd day of May 1919

*William Boyd*

vs.

*Amelia Boyd*

In the Circuit Court No. 2  
of Baltimore City.

TERM, 1917

MR. CLERK:

PLEASE ENTER MY APPEARANCE FOR DEFENDANT.

*J. Stewart Davis*

SOLICITOR.

*Amelia Boyd*

13176  
1919  
Circuit Cl. Nov  
of  
Baltimore City

Wm Boyd

vs  
Anselm Boyd

Answer to Bill

City Clerk please  
file

No 18091 B  
H

J Stewart Davis, atty  
1182 Lexington St.

15

Feb 15 May 1919



William Boyd

Vs.

Amelia Boyd

In The Circuit Court No.2

of

Baltimore City.

-----  
To The Honorable, The Judge of said Court

Your Respondent, in answer to the bill before this Court exhibited respectfully says

1. That she admits the first, ~~second, and~~ third, and fourth allegations of said bill.

2 That she most emphatically denies that the conduct of Your Orator in this case was in any way kind or affectionate, and on the contrary says that he was brutal and jealous and in no wise supported her in accordance with her station in life.

3 As to every allegation contained in the second paragraph, she neither denies nor admits the truthfulness thereof, but if the same be material to her rights in the premises she requires the strictest legal proof of same.

4 She most respectfully declares that the one child, Beatrice, not yet 5 years of age, was born as a result of said marriage and further says that child is now and always has been in the custody of Your Respondent.

Wherefor Your Respondent respectfully prays:

a. Further care and custody of said child and maintenance for it's support.

Having answered all the material allegations contained in bill of complaint, she respectfully requests that the same be dismissed with costs.

As in duty bound etc.

(John) Davis  
Attorney for respondent

73 176/1919  
IN THE CIRCUIT COURT #2 OF  
BALTIMORE CITY.

WILLIAM EDWARD BOYD,

VS

AMELIA BOYD.

PETITION FOR ALIMONY.

Mr. Clerk:

Please file,

*Webster S. Blades*  
Solicitor for petitioner.

*Sh 18091 B*  
*5*

HARRY B. WOLF,  
ATTORNEY AT LAW.  
110 E. LEXINGTON ST.,  
BALTIMORE, MD.

*Ed. 3' June 1919*

WILLIAM EDWARD BOYD,

vs

AMELIA BOYD.

IN THE CIRCUIT COURT #2 OF  
BALTIMORE CITY.

liw

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The petition of Amelia Boyd, respectfully represents:

- (1) That heretofore her husband filed his bill of complaint in this Court praying that he might be divorced a vinculo Matrimonii from your petitioner.
- (2) That your petitioner has answered said bill emphatically denying the material allegations therein.
- (3) That there is one child as issue of said marriage, viz., Beatrice, age 5 years.
- (4) That your petitioner is destitute of means of supporting herself and their child during the pendency of this suit or of defraying the costs and expenses attending the prosecution of the same, while her husband the said William Edward Boyd, is employed and earns about \$20. per week.

To the end therefore:

- (1) That your Honor may pass an Order authorizing and directing her husband, the said *Wm Edward Boyd* to pay unto her a reasonable sum as alimony and to pay to her counsel a reasonable sum as a fee.

And as in duty bound.,

*Webster S. Blades*  
Solicitor for petitioner.

Deane on  
William Edwards Boyd

LIX

B Docket

CIRCUIT COURT No. 2

Boyd

vs.

Boyd.

Order Counsel Fee and Alimony.

Pendente Lite

Husband Plaintiff

ORDER

3rd June 1919

No. 18091 B.

(6)

Copy = Copied

Filed 3rd June 1919

Webster S. Blades Clerk

SP 5953

B

Mon Ed & Thomas J. Mc Mully  
Sheriff

William Edward Boyd

vs.

Amelia Boyd

IN THE  
CIRCUIT COURT No 2

OF

BALTIMORE CITY

May

TERM, 1919

ORDERED BY THE COURT, this 3<sup>rd</sup> day of June 1919

that the Plaintiff William Edward Boyd

pay to the Defendant Amelia Boyd

the sum of Fifteen Dollars as Counsel Fee for the

Solicitor of the Defendant, and that he further pay the sum of Eight

Dollars per week, during the continuance of this suit, to the said Defendant

Amelia Boyd

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 19<sup>th</sup>

day of June 1919, provided a copy of this Order be served on the said Plaintiff

William Edward Boyd on or before the 9<sup>th</sup>

day of June 1919

John D. Dober

TRUE COPY—TEST:

Clerk.

\$20.00  
1 check

B Docket.....

**CIRCUIT COURT No. 2**

*Boyd*

vs.

*Boyd*

**Order Counsel Fee and Alimony.**

Pendente Lite  
Husband Plaintiff

ORDER

No. .... B.

( )

*Coty*

William Edward Boyd

vs.

Amelia Boyd

IN THE

CIRCUIT COURT No 2

OF

BALTIMORE CITY

May

TERM, 1919

ORDERED BY THE COURT, this 3<sup>rd</sup> day of June 1919

that the Plaintiff William Edward Boyd

pay to the Defendant Amelia Boyd

the sum of Fifteen Dollars as Counsel Fee for the

Solicitor of the Defendant, and that he further pay the sum of Eight

Dollars per week, during the continuance of this suit, to the said Defendant

Amelia

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 19<sup>th</sup>

day of June 1919, provided a copy of this Order be served on the said Plaintiff

William Edward Boyd on or before the 9<sup>th</sup>

day of June 1919

John J. Wobler

TRUE COPY—TEST:

John Pleasant

Clerk.

Circuit Court No. 2

176  
191 9

J

Docket 28

William Edward Boyd  
vs.

Amelia Boyd

Boyd

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

Order 17<sup>th</sup> June 1919

No. 18091 B  
8

Filed 17<sup>th</sup> June 1919



William Edward Boyd

vs.

Amelia Boyd

IN THE

Circuit Court No. 2,

OF

BALTIMORE CITY.

To the Honorable the Judge of the  
Circuit Court No. 2 of Baltimore City:

THE PETITION OF William Edward Boyd, the plaintiff

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

Roy S. Bond  
Solicitor for Plaintiff

ORDERED, this 17<sup>th</sup> day of June 1919, 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.

John J. Doherty

Doc. B 176  
1919

In the Circuit Court, No 2  
OF BALTIMORE CITY

DEPOSITIONS

William Edward Boyd

vs.  
Clara Boyd

No. 18091 B  
9

PLAINTIFF'S COSTS

Examiners.....\$ 8.00  
Copies.....  
Sheriff.....  
Stenographer.....1.00  
\$ 9.00

DEFENDANT'S COSTS

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

Id. 16<sup>th</sup> July 1919

William Edward Boyd

vs.

Annelia Boyd

In the Circuit Court No 2

OF BALTIMORE CITY.

The above cause being a case

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  
17th day of June 1919, met on  
the 5th day of July in the year nineteen  
hundred and nineteen at my office, in the City of Baltimore, in the State  
of Maryland, and assigned the 4th day of July  
in the same year at three o'clock in the after noon and the  
office of Ray S. Smith Esq 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 depositions, that  
is to say:—

William Edward Boyd,

v.

Amelia Boyd.

Testimony taken at the office of Roy S. Bond, Esq.,  
Coutland Street, Baltimore, Maryland, July 7th.,  
1919, at 3 O'clock P. M.

WILLIAM E. BOYD, the Plaintiff in this case, produced on his 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. William E. Boyd, 666 Sarahanne Street; porter.
- 2 Q. Do you know the parties to this suit?
- A. I am the Plaintiff and my wife is the Defendant.

BY MR. BOND:

- 1 Q. Mr. Boyd, when were you married?
- A. February 2nd., 1914.
- 2 Q. By whom were you married?
- A. By the Reverend Mr. Brown of the Leadenhal Street Baptist Church.
- 3 Q. Baltimore City, State of Maryland?
- A. Yes.
- 4 Q. Are you living with your wife now?
- A. No sir.

William E. Boyd.

5 Q. Did you leave her or did she leave you?

A. She left me.

6 Q. When?

A. August 15th., 1915.

7 Q. Now, Mr. Boyd, tell us how you treated your wife while living with her?

A. Well, while I was living with my wife, I treated her as a gentleman should treat a wife, and did everything that I could that laid in my power, that I could do for her, and of the evening when I would come home from work she would not have anything for me to eat, and she would get ready and go to her mother's house so she said, and would stay until twelve and one O'clock at night, and on Sunday mornings I had to go to the mother's to get something to eat, , and one evening I asked her why she did not have any supper, and - because she did not have any, and she said that she had been down helping her mother, and she said that she would help her mother before she would get anything for me, and the next day when I came home she had a loaf of bread and some box cheese, and I - and one sandwitch, and a cup of ice water, and I said "I have been working hard all day, and I would certainly like something more than that" and she said "That

William E. Boyd.

is all that you are going to get" and she picks the baby up and goes home.

8 Q. Now, finally on August 15th., 1915, she left you?

A. Yes.

9 Q. Had she ever left you before that?

A. Yes.

10 Q. How many times?

A. Three or four times.

11 Q. Did the final leaving occur on the 15th., August 1915?

A. Yes.

12 Q. Tell the circumstances under which she left you.

A. Why, the reason that she left me August 15th., 1915, was simply because of her sticking a pair of shears in my shoulder, and I goes up to the Hospital, and the Police Officer wanted me to prosecute her, and have her arrested and I would not do it, and when I came home she got angry because I went to the University Hospital, and the Doctor,- the Round Sergeant came down the next day, and I would not have anything done with her because she was my wife, and I was employed, and I was working at the same place where I am working now only it was a branch on Lombard Street,- I have been employed there eleven years, and they wanted me to have her arrested, and

William E. Boyd.

I said "No", I did not want her arrested,- I did not want anything done with my wife, and I came home and she had ramsacked the rooms and ramsacked everything except the bed, wash stand, bureau and one spread; everything was completely taken out of the house, and she was gone.

13 Q. Where had she gone?

A. To her mother's at 221 West Hamburg Street.

14 Q. Is she still there ?

A. Yes.

15 Q. Have you asked her to come back.

A. Yes; several times, and pleaded and begged her and all.

16 Q. Was your conduct always that of a kind, chaste and true husband, and was it in all ways above reproach in all respects.

A. Yes; I did my level best for her. I met her in the Leadenhal Street Baptist Church, and until the time she left me,- I met her at the Leadenhal Baptist Church as a Sunday School girl, and I have been in the Leadenhal Street Baptist Church ever since I was one year old, and I am still a member of the Leadenhal Street Baptist Church, and I tried to treat her to the best of my ability right, and the Pastor partly saw to that.

William E. Boyd.

17 Q. Did you give her any reason for abandoning you?

A. No sir; none at all; I never drank any in my life, and I never used any profane language at all.

18 Q. Did she declare her intention never to live with you any more?

A. Yes.

19 Q. Is there any hope or expectation of your living together any more?

A. No sir; I don't think so; none in this World; nomsir.

20 Q. Are both you and your wife residents of Baltimore City, State of Maryland, and have you been for more than two years prior to the filing of this suit?

A. Yes.

21 Q. Have you been separated for more than three years prior to the filing of this suit?

A. Yes.

22 Q. Was her going away her own deliberate and final act?

A. Yes.

23 Q. You have one child, have you not?

A. Yes; on my side; I have one, but she has two other children.

24 Q. What has her conduct been both before and since the separation? Have you been a perfect gentleman



William E. Boyd.

in all respects.

A. Yes; I have.

*In answer to question see last page*

DANIEL H. RICE, 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. Daniel H. Rice, 739 W. Franklin Street;  
laborer.

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

A. Yes.

BY MR. BOND:

1 Q. Mr. Boyd alleges that he was married on the 2nd., February 1914, is that correct?

A. Yes.

2 Q Do you remember when Mr. and Mrs. Boyd went around together as husband and wife?

A. Yes; I do.

3 Q. Are they living together now?

A. No sir.

4 Q He says that he was married at the home of her mother - the mother of his wife - on the date mentioned, is that correct?

A. Yes; 15th. August; that is right.

5 Q. I am not talking of the separation?

A. O, yes; 2nd., February 1914; yes.

Daniel H. Rice.

6 Q. That is correct, is it?

A. Yes.

7 Q. And when were they separated?

A. About the 15th., August.

7 Q. What year?

A. 1915.

8 Q. Did she leave him or did he leave her?

A. She left him.

9 Q. Were you present on the night of the separation?

A. Yes. The very same night that she left; yes, the very same night.

10 Q. He has testified that she stole her clothes out and got mad besides?

A. Yes; that is the idea; that was the main trouble.

12 Q. Was he always a kind, affectionate and true husband to his wife?

A. Yes; he always was; yes, from 'way up.

13 Q. How did he provide the home for his little family?

A. He was about as good as any man to his wife that I know of, to be a young man. He always supported her, and brought her things home like an older man,

Daniel H. Rice.

and she did not have a thing to do at all except to stay home.

14 Q. Was her going away her deliberate and final act?

A. Yes, indeed.

15 Q. He in no way forced her to go away?

A. Nossir.

16 Q. He said that he asked her on several occasions to come back; is that right?

A. Yes; several times; I heard him argue with her myself and she refused to come back.

18 Q. Has the separation of the parties to this suit continued uninterruptedly for more than three years prior to the filing of this suit.

A. Yes; it has.

18 Q. That is to say: They have never lived together since this separation?

A. No sir.

21 Q. Now, you have seen him quite frequently?

A. Yes.

22 Q. Seen him and seen her?

A. Yes; I saw them both.

Daniel H. Rice.

23 Q. Where does she live?

A. On Hamburg Street.

24 Q. At the home of her mother?

A. Yes; but I do not know the number.

25 Q. They have never lived or cohabited together since they separated, to your knowledge?

A. No sir; not that I know of.

26 Q. And you know as a matter of fact that they have ~~no~~ never lived or cohabited together since the 15th., day of August 1915?

A. No sir; they have not.

27 Q. In fact you have more than once heard Mr. Boyd endeavor to have his wife return to him, and you have repeatedly heard her refuse.

A. Yes; that is right.

28 Q. As a matter of fact do you know whether or not they are husband and wife.

A. Yes; they are married.

29 Q. Have they both been residents of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit?

A. Yes.

Daniel H. Rice.

30 Q. They have been here in Baltimore to your knowledge for more than two years.

A. Yes; all their lives that I know of.

31 Q. And they have been separated for more than three years prior to the filing of this suit, to your knowledge

A. Yes.

32 Q. Is there any hope or expectation of their living together any more.

A. No sir; not that I know of.

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. ---

~~Answer~~

Daniel H. Rice .

WILLIAM E. BOYD, the Plaintiff in this case,  
heretofore produced and sworn, recalled:

BY MR. BOND:

1 Q. Mr. Boyd, you are satisfied, are you not,  
for your child Beatrice Boyd that is five years old to  
remain in the custody of her mother until the further  
Order of the Court, if any?

A. Yes.

2 Q. You have one child, have you not?

A. Yes.

2300. That is the one she has.

A. Yes.

4 Q. How old is the child?

A. Five years old.

5 Q. You have always been ready and willing to  
supply the wants of that child, have you not.

A. Yes.

6 Q. And you are willing so to do?

A. Yes.

7 Q., You are?

A. Yes; to the best of my ability.

8 Q. The child at the present time is in her  
custody,- is in the care of the mother, is it not?

A. Yes.



B 8-1

15

William E. Boyd.

9 Q. And you are willing , are you not, for the child to remain there, until the further order of the Court.

A. Yes; if she likes she can keep the child.

10 Q. The child has always been in the custody of the mother ever since the separation?

A. Yes.

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. ---

*Wm. Edward Boyd.*

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 July.....in the year of Our Lord nineteen hundred and nineteen.....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 July.....of which I was employed by the Plaintiff....., and on one.....by the Defendant.....

A. de Russy Sappington  
Examiner.

1919 B

Docket No. ....

William Edward Boyd

vs.

Amelia Boyd

Order of Reference  
16<sup>th</sup> July 1919  
and Report

Robertson

No. 18091 B  
11-12

✓

Order Filed 16<sup>th</sup> day of July 1919  
Report Filed 1<sup>st</sup> day of Aug 1919

William Edward Boyd

vs.

Emelia Boyd

IN THE  
Circuit Court No. 2  
OF  
BALTIMORE CITY

July

Term, 1919

16<sup>th</sup>

This case being submitted, without argument, it is ordered by the Court, this  
of July, 1919, 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.

James M. Ackerly

Report of Auditor and Master

Bill filed by husband against wife  
for a divorce a vinculo matrimonii  
for abandonment for three  
years Code Art. 16.5.36  
Defendant summoned and answers  
Proof shows marriage residence  
and abandonment of plaintiff for  
at least three years continuous  
deliberate fraud and without hope  
of reconciliation the minor child  
to remain with defendant subject  
to the jurisdiction of the court  
Case submitted and ready for decision  
Alex H. Robertson  
Auditor & Master

Circuit Court No. 2

B

176

191<sup>9</sup>

No.

Docket

William Edward Boyd,

vs.

Amelia Boyd.

DECREE OF DIVORCE.

4<sup>th</sup> August 1919

R

No.

18091 B

13

Copy = looked  
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Filed

4<sup>th</sup> August

, 1919

This is a proper decree,

*Max W. Robertson*  
Auditor & Master.

William Edward Boyd.

vs.

Amelia Boyd.

IN THE

# Circuit Court No. 2

OF

BALTIMORE CITY.

*July*

Term, 191...9

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

It is thereupon, this *4th* day of *August* Anno Domini, one thousand nine hundred and *nineteen* by the CIRCUIT COURT No. 2 OF BALTIMORE CITY, *Adjudged, Ordered and Decreed*, that the said

William Edward Boyd

the above named complainant be, and he is hereby DIVORCED A VINCULO MATRIMONII, from the defendant. *Amelia Boyd*, and that the minor child *Beatrice E. Boyd* remain in the custody of the defendant, subject to the jurisdiction of the court.

And it is further Ordered, that the said plaintiff pay the cost of this proceeding.

*Carroll T. Bond*

I, JOHN PLEASANTS, Clerk of the Circuit Court No. 2 of Baltimore City, do hereby certify that the above is a true copy of the decree taken from the record of proceedings in said cause.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of the said Court, this \_\_\_\_\_ day of \_\_\_\_\_ 191...