IN THE CIRCUIT COURT OF Vs. 1646 E. Madieon St. BILL FOR DIVORCE ATTORNEYS FOR PLAINTIFF.

J. STEWARD DAVIS

ATTORNEY AT AW

PARTY PAUL BOACE / 925

BAUMGARTEN & CO., IN

ARNETT BROWN

IN THE CIRCUIT COURT

VS.

:

OF

HARRIETT BROWN

BALTIMORE CITY.

TO THE HONORABLE. THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents;

- I. That he was married to his wife, Harriett Brown on the 19th day of August, 1916 and with whom he resided until about the 23rd day of January, 1921 when the defendant deserted the plaintiff.
- 2. That though the conduct of your Orator toward the said Harriett Brown, has always been kind, affectionate and above reproach, she has without any just cause or reason abandoned and deserted him and has declared her intentions to live with him no longer and that such abandonment has continued uninterruptedly for more than three years and is deliberate and final, and the separation of the parties is beyond any reasonable expectation of reconciliation.
- That the said Harriett Brown has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned men, whose names to your Orator are unknown, and said offense has not been condoned by your Orator.
- 4. That your Orator has not lived or co-habited with the said defendant since said desertion.
- 5. That there are two children born as result of said marriage; Zebedee, age seven years and Floyd, age five years, for whom your Orator prays the custody.
- of the State of Maryland having resided in Baltimore City for more than three years prior to the filing of this Bill of Complaint.

TO THE END. THEREFORE:

- (a) That your Orator may be divorced A Vinculo Matrimonfii from the said Harriett Brown.
- (b) That he may have the custody of the said infant children, Zebedee and Floyd.
- (c) That he may have such other and further relief as his case may require.

May it please your Honor to grant unto your Orator the Writ of Subpoens directed against the said Harriett Brown, commanding and requiring her 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.

Savis Funds.
SOLICITORS FOR COMPLAINANT.

RHISSUED

EQUITY SUBPOENA

The State of Maryland

On

Harriett Brown

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

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

day of

192.

Issued the

// day of

 \prime , in the year 192 \bigcirc

Clerk

MEMORANDUM:

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

(General Equity Rules 11)

EQUITY SUBPOENA

The State of Maryland

Tn

Harriett Brown

Time Just 1995

Bas R. Whitefird

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

Umett Brown

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

192

Issued the

- My day of

, in the year 1920)

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office,

room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11)

65 Ct. Ct.
1925 Docket \$ 65

arvetto Brown

s.

Harriet Brown

Decree Pro Confesso.

Dapp

13 2 3 3 0 3

Filed 18 MCh 1926

arnett Brown

IN THE

Circuit Court

OF

BALTIMORE CITY.

Term, 1926

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).

march in the year nineteen It is thereupon this hundred and twenty Rux 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 Nunc Protune as of the 14th of March 1926. James P. Gorler Court, take testimony to support the allegations of the bill.

In the Circuit Court,	
of Baltimore City	
DEPOSITIONS	
aruett Brown	
Harritt Brown	
No. 28 30 3 B	
No. 48 20,210	
PLAINTIFF'S COSTS	
(0))	
PLAINTIFF'S COSTS	
PLAINTIFF'S GOSTS Examiners \$	
PLAINTIFF'S COSTS Examiners \$	
PLAINTIFF'S GOSTS Examiners \$	
PLAINTIFF'S GOSTS Examiners \$	
PLAINTIFF'S GOSTS Examiners. \$	
PLAINTIFF'S GOSTS Examiners \$ Copies \$ Sheriff \$ Stenographer \$ DEFENDANT'S GOSTS Examiners \$	
PLAINTIFF'S GOSTS Examiners \$ Copies Sheriff Stenographer DEFENDANT'S GOSTS Examiners \$ Copies S	
PLAINTIFF'S GOSTS Examiners \$ Copies Sheriff Stenographer DEFENDANT'S GOSTS Examiners \$ Copies Sheriff	
PLAINTIFF'S GOSTS Examiners \$ Copies Sheriff Stenographer DEFENDANT'S GOSTS Examiners \$ Copies S	

•

•		
aruett Brown		
•	In the Circuit Court	
Harritt Brown	OF BALTIMORE CITY.	
		_ ·
Decree O	so Confesso laring	
heen passed	in Said cause	
and notice having been given me by the		
	ie, I, A. de RUSSY SAPPINGTON, one iit. Courts of Baltimore City, under and by	
// // //	Circuit Court, passed in said cause on the	
. // 0	of March 19.36, met on	
hundred and twenty - six at my o	of March in the year nineteen ffice, in the city of Baltimore, in the State	
of Maryland, and assigned the	teends day of March o'clock in the after - noon and the	
office of Slewart Sario Ba	o'clock in the after moon and the	
	ch examination of witnesses in said cause;	
•	ce I attended, due notice of such meeting -	
Lin	presence of the Solicitorof the	
is to say:—	to take the following depositions, that	
10 to buy.	· · · · · · · · · · · · · · · · · · ·	

ARNETT BROWN

VS.

HARRIETT BROWN.

Testimony taken before me, A. deRussy Sappington, Examiner, at the offices of George Evans, Baltimore, Md. on March 15, 1926, at 2.30 o'clock in the afternoon.

Thereupon---

ARNETT BROWN,

the plaintiff, of lawful age, produced on his own behalf, having been first duly sworn according to law, was examined and testified as follows:

By the Examiner:

- Q Please state your name, residence and occupation?
- A Arnett Brown, 743 George Street, steel work.
 - Q Do you know the parties to this suit?

A Yes; I am the plaintiff and the defendant is my wife.

By Mr. Evans:

- Q When, where and by whom were you married?
- A On August 19, 1916, at Carrollton,
 Virginia, by Reverend D. A. Blake, a Minister of the
 Gospel.
 - Q Are you living with your wife now?
 - A No. sir.
 - Which one left the other, and when?
 - A She left me on January 23, 1921
 - Q Did you give her any just cause?
 - A No, sir.
- Q State whether or not you were always a kind, affectionate and faithful husband?
 - A I was.
- Q State the circumstances surrounding the separation?
- A She stayed out late at nights and I told her about it and she said she was going to leave,

and she took her clothes and left.

- Q Did you ask her to stay and do better?
- A Yes, but she said she was going.
- Q Has the separation between you continued uninterruptedly for more than three years prior to the filing of this suit?
 - A It has, since January 23, 1921 when she left.
 - Q Is the separation deliberate and final and beyond any reasonable hope or expectation of reconciliation?
 - A Yes, sir, it hs.
 - Q Have you been a resident of the City of Baltimore, State of Maryland for more than two years prior to the filing of this suit?
 - A Yes, sir.
 - Q Are there any children living as result of your marriage?
 - A Two; Zebedee, 7, and Floyd, 5. They are with my Mother, but I want their custody.
 - Q Are you able and willing to support, rear and educate the children if they are awarded to you?

- A Yes, sir, I am.
- Q Have you talked to your wife about the children?
- A I asked her about coming back and taking care of the children and she said she wasn't thinking of the children.
 - Q Where is your Mother?
 - A At Carrollton, Virginia.
 - Q Have you been supporting these children?
 - A I have.

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.--- ///

Donett Brown

Thereupon ---

HOWARD GOODWIN,

a witness of lawful age, produced on behalf of the plaintiff, having been first duly sworn according to law, was examined and testified as follows:

By the Examiner:

- Q State your name, residence and occupation?
- A Howard Goodwin, 743 George Street, acetylene burner.
 - Q Do you know the parties to this suit?
 - A I do

By Mr. Evans:

- Q Do you know that they were married and lived together at one time as husband and wife?
 - A I do.
- Q Were they known and recognized in the community in which they lived as husband and wife?
 - A Yes, sir.
 - Q Are they living together now?
 - A No, sir.
 - Q Did you visit them while they lived together?
 - A I did.

- Q Which one left the other, and when?
- A She left him on January 23, 1921.
- Q Did he give her any just cause to leave?
- A No. sir.
- Q State whether or not he was a kind, affectionate and faithful husband?
 - A Yes, sir, he was.
- Q State the circumstances surrounding the separation?
- A She went out at nights and he spoke to her about it and she left him. He asked her to stay but she refused.
- Q Has the separation continued uninterruptedly for more than three years prior to the filing of this suit?
 - A It has.
- Q Do you think the separation is deliberate and final and beyond any reasonable hope or expectation of reconciliation?
 - A Yes, sir.

- Q Has he been a resident of the City of Baltimore, State of Maryland for more than two years prior to the filing of this suit?
 - A Yes, sir.
- Q Are the names and ages of the children properly given by the father in his testimony?
 - A Yes, sir.
- Q Do you think he is a fit and proper person to have the custody of the children?
 - A I do.
- Q Is he able and willing to support, rear and educate the children?
- A Yes, he is. He is always talking about the children, saying that he wants them.
 - Q Were you at his house when his wife left?
- A Yes. We went in and the door was open and she and her things were gone.

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.-Mo Hawai Agachin

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 thirtieth day of august in the year of Our Lord nineteen hundred and twenty - air at the
in the year of Our Lord nineteen hundred and twenty - six at the
City of Baltimore, in the State of Maryland. Calculation (SEAL). Examiner.
There are WO. Exhibits with these depositions, to wit:
Plaintiff's Exhibit
Defendant's Exhibit
Ode Repoughe
I, A. de RUSSY SAPPINGTON, the Examiner before whom the fore-
going depositions were taken, do hereby certify that I was employed in assigning a day, and taking the said depositions upon days, on days, on
of which I was employed by the Plaintiff, and on Torre
by the Defendant

Circuit Court

65

1995

Docket No. B66

Arnett Brown

vs.

Harriett Brown

Order of Reference and Report

Lyons

B No. 28303

Order Filed day of 1926
Report Filed day of 19

Cruett Brown	IN THE
	Circuit Court
Harriett Brown	OF
	BALTIMORE CITY
This case being submitted, without argument, it is o	ordered by the Court, this 4th
	that the same be and it is hereby referred to Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.	Venoy Orgoz
Report of Auditor	and Master
34	
•	
· · · · · · · · · · · · · · · · · · ·	

• •

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

B 65 1926.

ARNETT BROWN

VS.

HARRIETT BROWN

PETITION

Mr.Clerk:-

Please file.

ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS

Fd 10 Olph 192

BAUMGARTEN & CO.

ARNETT BROWN

IN THE CIRCUIT COURT

VS.

HARRIETT BROWN

BALTIMORE CITY

OF

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The petition of Arnett Brown respectfully represents unto your Honor:

- That on or about the 26th day of January, 1925 your petitioner filed a bill for divorce A Vinculo Matrimonii again st one Harriett Brown.
- 2. That on or about the 18th day of March, 1926 a Decree pro Confesso was filed and testimony taken under said decree. That said testimony was duly filed and referred to the Master. It appears from the docket entry that the defendant has not been summoned.
- That your petitioner desires to have the decree procentesso and order of reference and report stricken out that he may duly summon the defendant, Harriett Brown.

WHEREFORE YOUR PETITIONER PRAYS:

- (a) That the decree Pro Confesso filed the 18th day of March, 1926, be stricken out.
- (b) That the Order of Reference and report filed the 4th day of August 1926 be stricken out.
 - 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 against the said Harriett Brown, commanding and requiring her to be and appeari 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, e to.

ATTORNEYS FOR PLAINTIFF.

Ordered by the Court this /v day of September, 1926 that the decree pro confesso filed the 18th day of March, 1926 and the Order of Reference and Report filed the 4th day of August 1926, be and the same are hereby stricken out and it is further ordered that the plaintiff be granted the Writ of Subpoena directed against the defendant as prayed.

Charles Toku

Ct. Ct. Docket No. SOLICITOR

non Eal

EQUITY SUBPOENA

The State of Maryland

Tn

Harriett Brown

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

arnett Brown

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

Issued the

daw of

100

of the year 192

Clerk

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

(General Equity Rules 11)

EQUITY SUBPOENA

The State of Maryland

Tn

REISSUED TO October Return Day, 192 6
Chash Whitford
Clerk

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

annett Brown

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

Issued the

dow of

100

day of

 f_{do} in the year 192

Clerk

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

(General Equity Rules 11)

VS. HARRIETT BROWN Mr.Clerk:-Please file.

DAVIS & EVANS

7a 23 Och 92

BAUMGARTEN & CO., INC.

DAVIS & EVANS, SOLICITORS 215 St. Paul Place, IN THE CIRCUIT COURT OF BALTIMORE CITY

ARNETT BROWN VS. HARRIETT BROWN ORDER OF PUBLICATION

65

The object of this Bill is to procure a divorce A Vinculo Matrimonii By the plaintiff from the defendant.

The bill recites that the parties were married on the I9th day of August I9I6 and lived together until on or about the 23rd day of January, I92I when the defendant deserted the plaintiff. That though the conduct of the plaintiff was kind, affectionate and above repreach the defendant deserted him without any just cause or reason and declared her intentions to live with him no longer and that the separation of the parties has continued uninterruptedly for more than three years and is deliberate and final and beyond reconciliation. That your Orator has not lived or co-habited with the said defendant since said desertion. That there are two children born as issue of said marriage; Zebedee, age seven years and Floyd, age five years for whom your Orator prays the custody.

The Bill recites also that both parties are residents of Baltimore City but that two summons sent to the defendant's last known residence have been returned non est by the Sheriff of Baltimore City.

City this 18 day of Other 1926 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 23 day of Novube 1926 give notice to the absent defendant of the object and substance of this bill, warning her to be and appear in this Court in person or by Solicitor on or before the 10 day of Docubel 25 to show cause, if any she may have, why a decree should not be passed as prayed.

Endranh

Ct. Ct.

Docket 365 Harriet Brown Decree Pro Confesso.

V 19

arnett Brown

Harriett Brown

us.

IN THE

Circuit Court

OF

BALTIMORE CITY.

Just

Term, 1926

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

day of in the year nineteen hundred and twenty Oerech 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.

Court, take testimony to support the allegations of the bill.

Set the testimony taken marches # 1926 be and the same bereby considered as having been taken courte this decree.

. .

Circuit Court	
65B65 19 W Docket No	
arnet Brown	
vs.	
Sarret Boson	
Order of Reference and Report	
Lyons	
V	
B No. 28303	

Order Filed 22 day of 192)
Report Filed day of 19

1/2 R/ Danon	1
arner & com	IN THE
·	/ Circuit Court
vs.	
Harriet Brown	OF
/V = 0002 V = 0 . 1	BALTIMORE CITY
·	Term, 1927
This case being submitted, without argument, it	is ordered by the Court, this 22
lay of January , 19	27, that the same be and it is hereby referred to
William P. Lyons	27, that the same be and it is hereby referred to
pleadings and the facts, and his opinion thereon.	
	0
	James P. Forter
Defendant proceeded against as of two successive 'non ests'.	s a non-resident after the return
	imore City for more than two years
prior to the filing of the bill pro	
The marriage proven.	
Abandonment uninterruptedly fo	or three years, its finality and
the irreconcilability of the partie	es proven.
Decree pro confesso was passed	d against the defendant and more
than thirty days have since elapsed	i.
Case made for awarding the gua	ardianship and custody of the minor
children of the parties to the plai	intiff and charging said plaintiff
with the maintenance and support of	said children.
Case ready for decree.	
· · · · · · · · · · · · · · · · · · ·	. •
	William P. Lyona
February 7, 1927	Auditor and Master

192	Docket No. 65
	Brown
ĺ	Brown
Certifica	ate of Publication
	B 28303 (12)
THE	DAILY REGORD

.

À.,

.

THE DAILY RECORD

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

IN THE CIRCUIT COURT, OF BALTI-MORE CITY—(B-65—1925)—Arnett Brown vs. Harriett Brown.

ORDER OF PUBLICATION.

The object of this bill is to procure a divorce a vinculo matrimonii by the plain-

tiff from the defendant.

The bill recites that the parties were married on the 19th day of August, 1916. and lived together until on or about the 23rd day of January, 1921, when the defendant deserted the plaintiff. That though the conduct of the plaintiff was kind, affectionate and above reproach the defendant deserted him without any just cause or reason and declared her intentions to live with him no longer and that the separation of the parties has contin--ued uninterruptedly for more than three years and is deliberate and final and beyond reconciliation. That your orator has not lived or co-habited with the said defendant since said desertion. That there are two children born as issue of said marriage; Zebedee, age seven years, and Floyd, age five years, for whom your orator prays the custody.

The bill recites also that both parties are residents of Baltimore City but that two summons sent to the defendant's last known residence have been returned "non lest" by the Sheriff of Baltimore City.

It is thereupon ordered by the Circuit Court of Baltimore City, this 23rd day of October, 1926, 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 23rd day of November, 1926, give notice to the absent defendant, of the object and substance of this bill, warning her to be and appear in this Court, in person or by solicitor, on or before the 10th day of December, 1926, to show cause, if any she may have, why a decree should not be passed as prayed.

ELI FRANK.

True Copy-Test:

025, n1, 8, 15

CHAS. R. WHITEFORD,

Baltimore, 192
We hereby certify that the annexed advertise
ment of Order Publication Circuit Cour
of Baltimore City, Case of
arnett Brown
vs. Harriett Brown
was published in THE DAILY RECORD, a daily news
paper published in the City of Baltimore, once in each o
successive weeks before th
23 lday of Movember, 1926
First insertion Actable 25 th 1926

NOV 1 5 1926

THE DAILY RECORD

Per Lenge la La

CIRCUIT COURT

B 65

No.

Docket

ARNETT BROWN

VS.

HARRIETT BROWN

Recorded

Polio 37 193 7

Decree of Divorce

B No. 28303

Fd 7 Feb 1927

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

Milliam Lyons Auditor and Master.

ARNETT BROWN	Circuit Court
VS.	OF
	BALTIMORE CITY,
HARRIETT BROWN	JanuaryTerm, 192.7.
This cause standing ready for hearing and being	ng duly submitted, the proceedings were by the Court
read and considered. It is thereupon, thisday	y of February, A. D. 1927
by the Circuit Court of Baltimore City, Adjudged, O	0
*1	DIVORCED A VINCULO MATRIMONII from the
Defendant, HARRIETT BROWN;	
AND it is further ordered that	the guardianship and custody of
Zebedee and Floyd Brown, minor ch	ildren of the parties, be and the
same are hereby awarded to the Con	mplainant, Arnett Brown, and the
said Complainant be and he is her	eby charged with the maintenance
and support of said children - al	l subject to the further order of
this Court.	
` \	
	•
	Complainant, Arnett Brown,
pay the cost of this proceeding.	11
	1. autur Jump