

A

In The Circuit Court
of

Baltimore City 1916

Albert Cassel vs

vs

Frank Cassel

Bill for James A. Mansa

Mr. Clerk please file
J. Steward Davis

B 20998

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BALTIMORE, MD.

J. Steward Davis 1916

Albert I. Cassell

In The Circuit Court

Vs.

of

Sarah E. Cassell

Baltimore City.

To The Honorable, The Judge of Said Court:

Your Orator, complaining, respectfully says:

FIRST, That the parties to this suit were married, April 14th. 1918, by Rev. Sampson Brooks, a methodist minister, in Baltimore, city, state of Maryland, and lived together as man and wife until April 5th. 1920.

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 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.

THIRD, That though the conduct of your Orator towards his wife has always been kind, affectionate and above reproach, she without just cause or reason has refused and does now refuse to live with your Orator at the city of his employment, where he always has been and ever was willing to provide a sufficient and comfortable home, for the defendant. The defendant has declared her intentions not to live with your Orator at said city or now-where else except with the defendant's mother, *and hence has deserted your Orator.*

FOURTH, That your Orator has never condoned the said desertion.

FIFTH, That there is one minor child, four and one half months of age.

WHEREFORE YOUR ORATOR PRAYS:

- a-A Divorce A Mensa et Thoro
- b-The care and custody of the said minor child
- c-Such other and further relief as the case may require.

May it please Your Honor to grant unto Your Orator a writ of subpoena ordering the defendant to be and appear in this Court on some day certain to be named therein, to show cause, if any she may have, why a decree should not be passed as prayed.

As in duty bound etc.

Albert J. Cassell

Complainant

C. J. Davis

Solicitor for complainant

State of Maryland

Baltimore City

} To Wit

I hereby certify that on this 12th day of May 1920, before me the subscriber, a Notary Public, of the State of Maryland, in and for the city of Baltimore, personally appeared Albert Cassell, the petitioner, in the foregoing proceedings, and made oath in due form of law, that the matter contained therein is true to the best of his knowledge and belief.

As witness my hand and Seal.

Arthur N. Rogers

Notary Public.

276 Pleo

Ct. Ct.

1920

Docket No.

Cassell

Cassell

Pl

SUBPOENA TO ANSWER BILL OF COMPLAINT

212 E. Federal St

No.

20998

(2)

Filed

29 May

1920

J. Steward *Watts*

SOLICITOR

4

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

Thomas J. M. Gully Sheriff

(Gully) Justo & Fees \$0.50

EQUITY SUBPOENA

The State of Maryland

To

Sarah E. Cassell

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said City, on the second Monday of *June* 1920, to answer the complaint of

Albert F. Cassell

against you in said Court exhibited.

HEREOF fail not, as you will answer the contrary at your peril:

WITNESS, the honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *10* day of *May* 1920

Issued the *12* day of *May* in the year 1920

Clark Whiteford Clerk.

Notice to the person summoned:

"Personal attendance in Court on the day named in the above writ is not required; but unless within fifteen (15) days after the return day, legal defense is made in the above mentioned suit a Judgment by default may be entered against you."

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

B *276*
ALBERT I. CASSELL, *1940*

v.

SARAH E. CASSELL.

"Answer to Bill & Order
Court"

Mr. Clerk:

Please file, etc.,

Webster Blades
Solicitor for respondent.

B 20998

(3)
HARRY B. WOLF,
ATTORNEY AT LAW

110-112 E. LEXINGTON ST.,
BALTIMORE, MD.

Ad 27 May 1920

ALBERT I. CASSELL,

*

v.

*

IN THE CIRCUIT COURT OF

*

BALTIMORE CITY.

*

SARAH E. CASSELL.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Answer of Sarah E. Cassell, to the bill of complaint heretofore filed against her, respectfully represents:

- (1) Answering paragraph One this respondent admits the marriage but says that the date of the separation mentioned in said paragraph is incorrect.
- (2) She admits the allegations contained in paragraph Two.
- (3) She denies emphatically the allegations contained in paragraph Three.
- (4) Answering paragraph Four this respondent says that as she has not been guilty of the crime of abandonment there is nothing for her husband to condone.
- (5) She admits the allegations contained in paragraph Five.

Having answered fully said bill of complaint she prays that the same may be hence dismissed.

Webster S. Blades
Solicitor for respondent.

Sarah E. Cassel

STATE OF MARYLAND,

CITY OF BALTIMORE, To Wit:

I HEREBY CERTIFY, That on this *28th* day of May, 1920, before me, the subscriber, a Notary Public in and for the State and City aforesaid personally appeared Sarah E. Cassel, and made oath in due form of law that the matters and facts above set forth are true to the best of her knowledge and belief.

As witness my hand and Notarial Seal.

Frank J. Roberts
Notary Public.

60B 276-1920.

IN THE CIRCUIT COURT
OF BALTIMORE CITY.

Albert Cassell
vs.
Sarah E. Cassell.

Cross-Bill.

Sarah E. Cassell

vs.

Albert Cassell.

B20998

CROSS-BILL OF COMPLAINT.

(47)

Mr. Clerk:

Please file, issue, etc.

Wm. C. Kump.

Attorney for Complainant in

Cross-Bill of Complaint.

Series of copy admitted

4-10-23

Wm. C. Kump
filed 10 April 1923

ALBERT CASSELL :
vs. :
SARAH E. CASSELL. : IN THE CIRCUIT COURT
--O--O-- :
SARAH E. CASSELL : OF BALTIMORE CITY.
vs. :
ALBERT CASSELL. :

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

The cross-bill of complaint of Sarah E. Cassell respectfully shows unto your Honor:

1. That on or about the 13th day of May, 1920, in a cause now pending in this Honorable Court entitled Albert Cassell vs. Sarah E. Cassell, where your oratrix, in this Bill of Complaint, -Sarah E. Cassell,- was named as respondent, and wherein Albert Cassell,- the respondent named in this Bill of Complaint,- was named as complainant, the said Albert Cassell filed a Bill of Complaint against your oratrix, charging her with abandonment and desertion, and praying that a decree might be passed divorcing the said Albert Cassell a mensa et thoro - - from your oratrix.

2. That your oratrix filed her answer to said Bill of Complaint, denying the charges therein made, and praying that the said Bill of Complaint be dismissed with costs to your oratrix.

3. That now your oratrix complainant, says:- That on or about April 4th, 1918, she was married to the said

Albert Cassell, and that she had by the said marriage one child, - Calvin B. Cassell, - who is now about three years old, and who is now in the custody of his mother, your oratrix. That your oratrix has resided in the City of Baltimore for two years last past, and that the said Albert Cassell is also a resident of the said City of Baltimore.

4. That ever since the said marriage your oratrix has behaved herself as a chaste, affectionate and faithful wife toward the said Albert Cassell.

5. That on or about the 5th day of April, 1920, the said Albert Cassell abandoned and deserted your oratrix and declared his intention to no longer live with her. That said abandonment and desertion of your oratrix by the said Albert Cassell has continued uninterruptedly for more than three years, is deliberate and final on the part of the said Albert Cassell, and is without any expectation or hope of a reconciliation.

TO THE END THEREFORE:-

1. That your oratrix, Sarah E. Cassell, may be divorced a vinculo matrimonii from the said Albert Cassell.

2. That your oratrix may have the guardianship and custody of the infant child of said marriage, the said Calvin B. Cassell, and that the defendant, Albert Cassell, be charged with the maintenance and support of said child.

3. And that your oratrix may have such other and further relief as her cause may require.

AND MAY IT PLEASE YOUR HONOR to grant unto your
oratrix the State's writ of Subpoena directed to the said
Albert Cassell, residing in Baltimore City, commanding
him to appear before this Honorable Court on or before
the day named therein to answer the charges made in this
Bill of Complaint, and to show cause, if any he may have,
why the relief asked for should not be granted as prayed.

AND as in duty bound, etc.

Sarah E. Eastell
Complainant in Cross-Bill of
Complaint.

Wm. C. Kump
Attorney for Complaint
in Cross-Bill of Complaint.

IN THE CIRCUIT COURT OF
BALTIMORE CITY

ALBERT CASSELL

VS.

SARAH E. CASSELL

Respondent's answer to
Cross-Bill.

B 20998

Mr. Clerk: -5

Please file.

J. Steward Davis
Attorney for respondent
to Cross-Bill.

DAVIS & BISHOP
ATTORNEYS AT LAW
BANNEKER BUILDING
14 E. PLACENT STREET
BALTIMORE, MD.

10 April 1923

ALBERT CASSELL : IN THE CIRCUIT COURT
VS. : OF
SARAH E. CASSELL : BALTIMORE CITY.
SARAH E. CASSELL :
VS. :
ALBERT CASSELL :

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator answering the cross-bill of complaint of the respondent respectfully says:-

(1) That the facts contained in the first paragraph of the respondent's cross-bill are admitted.

(2) That the facts contained in the second paragraph of the respondent's bill are admitted.

(3) That the facts contained in the third paragraph of the respondent's cross-bill are admitted.

(4) That the facts contained in the fourth paragraph of the respondent's cross-bill are admitted.

(5) That your Orator neither admits nor denies the allegations contained in the fifth paragraph of the respondent's cross-bill.

J. Steward Davis
Attorney for Respondent to Cross-Bill.

ok. Ct.

Case # 276,
re. 1920

Cassell

order to strike
out appearance

Pranzile
U.S. Blades
Ctly. for deliv.

B 20998
(6)

Ed 12 June 1923

ALBERT CASSELL,

vs.

SARAH E. CASSELL.

:
:
: IN THE CIRCUIT COURT
:
: OF BALTIMORE CITY.
:
: 60*B 276
::: 1920.

Mr. Clerk:

Please strike out my appearance for the
Defendant in the above entitled case.

Webster S. Blades
Attorney for Defendant.

CIRCUIT COURT

276
1920

Docket No. 60 B.

Albert Cassell

Sarah E. Cassell

Sarah E. Cassell

vs
Albert Cassell.

Order

19

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

20998

No.

<7>

Fd

14 June 19 23

Albert Cassell

vs

Sarah D Cassell

vs

Sarah E. Cassell

vs

Albert Cassell

IN THE
Circuit Court
OF
BALTIMORE CITY

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

THE PETITION OF Sarah E. Cassell, complainant
in Cross Bill of Complaint

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

John Rump
Solicitor for Complainant in
Cross Bill of Complaint

ORDERED, this 14 day of April 1923, 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.

Henry Duff

Doc. B $\frac{276}{1920}$

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Albert Cassell
Sarah Cassell

Sarah Cassell
Albert Cassell

No. 20998 B.

PLAINTIFF'S COSTS

Examiners 8 \$ _____

Copies _____

Sheriff _____

Stenographer _____

\$ _____

DEFENDANT'S COSTS

Examiners _____ \$ _____

Copies _____

Sheriff _____

Stenographer _____

\$ _____

sd H May 1923

H/K/11/2

Albert Cassell

Sarah Cassell

vs

Sarah Cassell

Albert Cassell

In the Circuit Court

OF BALTIMORE CITY.

The above cause being at issue

and notice having been given me by the Solicitor for the plaintiff

of a desire to take testimony in the same, I, A. de RUSSY SAPPINGTON, one of the Standing Examiners of the Circuit Courts of Baltimore City, under and by virtue of an order of the above named Circuit Court, passed in said cause on the fourteenth day of April 1923, met on the twenty-fourth day of April in the year nineteen hundred and twenty-three at my office, in the City of Baltimore, in the State of Maryland, and assigned the twenty-fifth day of April in the same year at four o'clock in the after - noon and the office of John C. Kump 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:—

8-3

Cassell,

v.

Cassell.

Testimony taken at the office of John Kump, Esq., Baltimore, Maryland, April 25th., 1923, at four O'clock P. M.

Sarah E. Cassell, the Plaintiff in this case, produced on her own behalf, having been first duly sworn, deposes and says as follows, that is to say:

By the Examiner:

1 Q. State your name residence and occupation?

A. Sarah E. Cassell, 212 East Federal Street; teacher

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

A. I am the Plaintiff and my husband is the Defendant.

By Mr. Kump:

1 Q. When were you married?

A. April 4th., 1918.

2 Q. Were you married by a Minister of the Gospel?

A. Yes.

3 Q. By a Religious Ceremony?

A. Yes.

4 Q. In Baltimore City.

A. Yes.

5 Q. Have you been a resident of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit?

Sarah E. Cassell.

A. Yes.

6 Q. Are there any children as the result of this marriage?

A. One.

7 Q. Name and age?

A. Calvin B. three years old.

8 Q. Have you the care and the custody of the children?

A. Yes.

9 Q. Do you want the care and the custody of the children

A. Yes.

10 Q. Do you want anything from your husband for the support of the children?

A. Yes; \$4.50 a week.

11 Q. Is he able to pay this?

A. Yes.

12 Q. Are you able to support and rear this child with that assistance?

A. Yes.

13 Q. What was your conduct towards your husband while living together.

A. I know that I treated him all right as a wife.

14 Q. State whether or not you were always a kind, affectionate and faithful wife?

Sarah E. Cassell.

A. Yes.

15 Q. Are you and your husband living together now?

A. No sir.

16 Q. Which left the other; did you leave him, or did he leave you?

A. He left me.

17 Q. When?

A. On the 5th., day of April 1920.

18 Q. Did he have any just cause or reason to abandon and desert you at that time?

A. No sir.

19 Q. What did he say and what did he do at the time that he left you?

A. He simply got his things together and left; that is all that I can tell you. He simply told me that he was going and that he was going for good, and I tried to get him to stay and live with me and he would not do it; I tried to reason with him but it did no good.

20 Q. You tried to get him to stay?

A. Yes.

21 Q. But notwithstanding that he abandoned and deserted you.

A. Yes.

22 Q. When did he abandon and desert you in the manner you have described?

Sarah E. Cassell.

A. On the 5th., day of April 1920.

23 Q. Has his abandonment of you continued uninterruptedly since the 5th., day of April 1920?

A. Yes.

24 Q. That is, have you lived or cohabited with him since that time?

A. No sir.

25 Q. State whether or not his abandonment of you was deliberate and final; did he deliberately and finally abandon and desert you?

A. Yes.

27 Q. State whether or not there is any reasonable expectation of a reconciliation; do you ever expect them to make up and live together again?

A. No sir.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this your examination, or the matters in question between the parties? If so, state the same fully and at large in your answer.

A.---

No

Sarah E. Cassell

6

Gladiola Johnson, 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. Gladiola Johnson, 1203 North Charles Street; maid.
2 Q. Do you know the parties to this suit?
A. Yes.

By Mr. Kump:

- 1 Q. Are they related to you?
A. No.
2 Q. Are the parties to this suit husband and wife?
A. Yes.
3 Q. Did they live together as husband and wife and were they always known and recognized in the community in which they lived as husband and wife?
A. Yes.
4 Q. Has the Plaintiff been a resident of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit?
A. Yes.
5 Q. There is one child as the result of this marriage; you know that.
A. Yes.
6 Q. And is the name and the age of the child cor-

G. Johnson.

rectly given by the mother?

A. Yes.

7 Q. Do you think that she is able and willing to support, educate and rear this child with \$4.50 a week contributed towards the support by the father?

A. Yes.

8 Q. And do you think that she is the fit and proper party to have the care and the custody of the child?

A. Yes.

9 Q. What was her conduct towards her husband while living together; how did she behave herself?

A. All right.

10 Q. State whether or not she was always a kind, affectionate and faithful wife?

A. Yes.

12 Q. Are the parties to this suit living together now?

A. No sir.

12 Q. Which left the other; did he leave her or did she leave him?

A. He left her.

13 Q. When?

A. April 5th.

14 Q. What year?

A. 1920.

G. Johnson.

15 Q. How do you know that he abandoned and deserted her at that time?

A. I was a friend of theirs, and I happened to be in there, and it was about the time that the baby was born, and I used to go back and forward there, and she told me that he was gone.

16 Q. How long did she continue to live in the same house in which her husband abandoned and deserted her after the desertion?

A. Always; she is living there now.

17 Q. Has he ever returned to her in that house since that time?

A. No sir.

18 Q. Was there anything to prevent him doing so if he had wanted to?

A. No sir.

19 Q. Has he provided or offered to provide a home for his wife since he abandoned and deserted her?

A. No sir.

20 Q. Was there anything to prevent him doing so if he had wanted to?

A. No sir.

21 Q. Has his abandonment of his wife continued uninterruptedly since April 5th., 1920?

A. Yes.

G. Johnson.

22 Q. That is, have they lived or cohabited together since that time?

A. No sir.

23 Q. State whether or not his abandonment of his wife was deliberate and final; did he deliberately and finally abandon and desert his wife?

A. Yes.

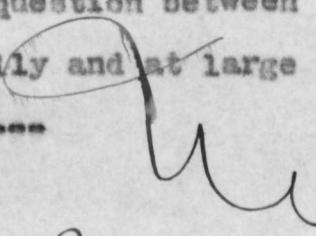
24 Q. State whether or not there is any reasonable expectation of a reconciliation?

A. No sir.

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.---


Gladys Johnson.

Samuel H. Brown, a witness of lawful age, produced on behalf of the Plaintiff, having been first duly sworn, deposes and says as follows, that is to say:

By the Examiner:

1 Q. State your name residence and occupation?

A. Samuel H. Brown, 204 East Federal Street; domestic.

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

A. Yes.

BY Mr. Kump.

1 Q. Are they husband and wife.

A. Yes.

2 Q. Did they live together as husband and wife and were they always known and recognized in the community in which they lived as husband and wife?

A. Yes.

3 Q. Has the Plaintiff been a resident of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit?

A. Yes.

4 Q. There is one child as the result of this marriage, you know that.

A. Yes.

5 Q. Do you think that she is the fit and proper party to have the care and custody of that child?

A. Yes.

Samuel H: Brown.

6 Q. And she able and willing to support, educate and rear this child with four dollars and a half contributed towards its support by the father?

A. Yes.

7 Q. What was her conduct towards her husband while living together?

A. Very clean.

8 Q. State whether or not she was always a kind, affectionate and faithful wife?

A. Yes.

9 Q. Are the parties to this suit living together now?

A. No sir.

10 Q. Which left the other; did he leave her or did she leave him.

A. He left her.

11 Q. When?

A. April 5th.

12 Q. What year?

A. 1920.

12 Q. Did he have any just cause or reason to abandon and desert his wife at that time?

A. No sir.

13 Q. How do you know that he abandoned and deserted her at that time?

A. I was right there when he did it.

Samuel H. Brown.

14 Q. What did he say and what did he do

A. He just said that he was going away, and he packed up his clothes and he left.

15 Q. Did his wife try to get him to stay and do as a husband should at the time he left?

A. Yes.

16 Q. And notwithstanding this he insisted upon leaving and he did leave?

A. Yes.

17 Q. Has she always lived in the same house in which her husband abandoned and deserted her after the desertion.

A. Yes.

18 Q. Has he ever returned to that house?

A. No sir.

19 Q. Was there anything to prevent him doing so if he had wanted to.

A. No sir.

20 Q. Has he provided or offered to provide a home for his wife since that time?

A. No sir.

21 Q. Was there anything to prevent him doing so if he had wanted to?

A. No sir.

22 Q. Has his abandonment of his wife continued uninterruptedly since April 5th., 1920

Samuel H. Brown.

A. Yes.

23 Q. State whether or not said abandonment was deliberate and final; did he deliberately and finally abandon and desert his wife?

A. Yes.

24 Q. State whether or not there is any reasonable expectation of a reconciliation; do you ever expect them to make up and live together again?

A. No sir.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this, your examination, or the matters in question between the parties? If so, state the same fully and at large in your answer.

A.---

No

Samuel H. Brown

No other witnesses being named or produced before me, I then, at the request of the Solicitor C of the respective parties closed the depositions taken in said cause and now return them closed under my hand and seal, on this 4th day of May in the year of Our Lord nineteen hundred and twenty three at the City of Baltimore, in the State of Maryland.

A. de Russey Sappington (SEAL).
Examiner.

There are no Exhibits with these depositions, to wit:

Plaintiff's Exhibit

Defendant's Exhibit

A. de Russey Sappington
Examiner.

I, A. de RUSSY SAPPINGTON, the Examiner before whom the foregoing depositions were taken, do hereby certify that I was employed in assigning a day, and taking the said depositions upon two days, on both of which I was employed by the Plaintiff, and on none by the Defendant.

A. de Russey Sappington
Examiner.

A G R E E M E N T .

P 276
ALBERT I. CASSELL

and

SARAH E. CASSELL.

B20998

9

At 4 may 1923

^{I.}
 ALBERT CASSELL :
 VS. :
 SARAH E. CASSELL. : IN THE CIRCUIT COURT
 --O--O-- :
 SARAH E. CASSELL : OF BALTIMORE CITY.
 VS. :
 ALBERT ^{I.}CASSELL. :

AGREEMENT.

Subject to the approval of the Court, it is hereby agreed between the Complainant and the Defendant in the Cross-Bill in this case that the custody of the infant child of the parties, viz: Calvin B. Cassell, shall be awarded to the Complainant, Sarah E. Cassell, and that the Defendant, Albert ^{I.}Cassell, shall contribute weekly to the support and maintenance of said child the sum of Four Dollars and Fifty Cents (\$4.50).

And it is further agreed between the parties hereto in consideration of the premises, of One Dollar, and for other good and valuable considerations, that the Complainant, Sarah E. Cassell, shall and she hereby does waive any and all marital rights of every kind, in, to and against the property of the Defendant, Albert ^{I.}Cassell, and more particularly any and all claim to support for herself, and all claim to alimony, both pendente lite and permanent.

Witness the hands and seals of said parties this
 30th day of April, 1923.

TEST:

as to Albert ^{I.}Cassell - *[Signature]*
 as to S.E. Cassell - *[Signature]*

Albert I. Cassell (SEAL)

Sarah E. Cassell (SEAL)

Circuit Court

276
19 20

B Docket No. 60

Albert Cassell

vs.

Sarah E. Cassell

Sarah E. Cassell

vs.

Albert Cassell

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file,

John C. Kump
Solicitor for Plaintiff.
in Cross-Bill of Complaint.

No. B20998

Filed 4 May 19 20

Albert Cassell
Sarah E. Cassell
Sarah E. Cassell
Albert Cassell.

*In the Circuit Court
of Baltimore City*

January TERM 1923

To the Honorable

Henry Duffy
Judge of Said Court:

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

John C. Kump.

[Signature]

Solicitor for Plaintiff,
in Cross-Bill of Complaint.

Solicitor for Defendant,
in Cross-Bill of Complaint.

276
Circuit Court

19 20 Docket No.

Cassell

vs.

Cassell

Order of Reference
and Report

B20998

No.

~~Probert~~ 11 ✓

Order Filed 15 day of May 19

Report Filed 11 day of May 19

22
23

Albert Cassell

vs.

Sarah E Cassell
+ Cross Bill

IN THE
Circuit Court

OF
BALTIMORE CITY

March Term, 19 22
5th

This case being submitted, without argument, it is ordered by the Court, this
day of May, 19 23, that the same be and it is hereby referred to
Alex H Robertson, Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.

Alex H Robertson

Report of Auditor and Master

Bill filed by husband against wife for a divorce a mensa et thoro for
abandonment. Code Art. 16, Sec. 37.

Defendant summoned and answers.

Cross-bill filed by wife against husband for a divorce a vinculo matri-
monii for abandonment for three years and for the care and custody of the
minor child. Code Art. 16, Sec. 36.

Defendant in cross-bill answers.

Proof shows marriage, residence and the abandonment of the plaintiff
in the cross-bill for three years, continuous, deliberate, final and without
hope of reconciliation and that the care and custody of the minor child
should be awarded to the plaintiff in the cross-bill, the said Sarah E.
Cassell.

Case submitted and ready for decree.

Alex H Robertson

Auditor and Master.

2

CIRCUIT COURT

B 276
1920 No. Docket

Albert I. Cassell
vs.
Sarah E. Cassell
Cross ~~vs.~~ Bill
Sarah E. Cassell
vs.
Albert I. Cassell

Recorded
Folio 110 1923

Decree of Divorce

B No. 20998
2127

Filed 11 May 1923

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

Alex. M. Miller
Auditor and Master.

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

..... Albert I. Cassell

vs.

Sarah E. Cassell

vs.

Cross Bill

Sarah E. Cassell

vs.

..... Albert I. Cassell

March Term, 19*23*

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

It is thereupon, this *11th* day of *May*, A. D. 1923, by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said -----
 ----- Sarah E. Cassell -----

in the Cross-bill the above named Complainant be and she is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, in the cross-bill, the said Albert I. Cassell.

And that the care and custody of the minor child Calvin B. Cassell, be awarded to the plaintiff in the cross-bill, the said Sarah E. Cassell and that the defendant in the cross-bill pay to the plaintiff in the cross-bill the sum of \$4.50 per week for the support and maintenance of the said minor child.

And that the original bill of Albert I. Cassell vs. Sarah E. Cassell be and the same is hereby dismissed.

And it is further Ordered, That the said Albert I. Cassell, the defendant in the cross-bill pay the cost of this proceeding.

Henry Duffy