

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

64 B 127

WILLIAM H. CHEW *1924*

VS.

SUSIE B. CHEW

BILL FOR DIVORCE

B 26605

Mr. Clerk:-

(1) (2)
Please file.

& Steward Davis

George W. Evans
ATTORNEYS FOR PLAINTIFF.

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE
BALTIMORE, MD.

fd 20 B 1924
11 21 " "

WILLIAM H. CHEW : IN THE CIRCUIT COURT
VS. : OF
SUSIE B. CHEW : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

1. That he was married to his wife, Susie B. Chew, on or about the 6th day of October, 1914 and with whom he resided until about the 17th day of October, 1918 when the defendant deserted the plaintiff.
2. That though the conduct of your Orator toward the said Susie B. Chew 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.
3. That the said Susie B. Chew, 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 no children as issue of said marriage.
6. That your Orator is a citizen of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this bill of complaint, but that the defendant is a non-resident of the State of Maryland, and when last heard of was in Atlantic City, New Jersey.

TO THE END, THEREFORE:

(a) That your Orator may be divorced a Vinculo Matrimonii from the said Susie B. Chew.

(b) 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 Order of Publication directed against the said Susie B. Chew, a non-resident of the State of Maryland aforesaid, 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.

J. Steward Davis
George Evans
SOLICITORS FOR COMPLAINANT.

J STEWARD DAVIS AND GEORGE W. EVANS, SOLICITORS

215 ST. PAUL PLACE

IN THE CIRCUIT COURT OF BALTIMORE CITY.

WILLIAM H. CHEW VS. SUSIE B. CHEW

ORDER OF PUBLICATION

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 6th day of October, 1914 and that they lived together until about the 17th day of October 1918, when the defendant deserted the plaintiff. That there are no children as issue of said marriage. That the defendant is a non-resident of the State of Maryland and when last heard of was in Atlantic City, New Jersey. That the defendant deserted the plaintiff without any just cause or reason and has declared her intentions to live with him no longer, that said abandonment has continued uninterruptedly for more than three years and is deliberate and final, and the separation of the parties is beyond any reasonable hope of reconciliation. That the defendant has on divers days and times since said marriage committed the crime of adultery with divers, lewd and abandoned men and said offense has not been condoned by your Orator. That the plaintiff has been a citizen of the State of Maryland for more than three years prior to the filing of this bill of complaint.

It is thereupon this *21* day of *February* 1924, ordered by the Circuit Court of Baltimore City that the plaintiff by causing a copy of this order to be published in Baltimore City *once* in each of four successive weeks, before the *26th* day of *April* 1924, 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 *14th* day of *April* 1924, to show cause, if any she may have, why a decree should not be passed as prayed.

Charles F. Brown

127 1364

1924 Docket No.....

Chew

vs.

Chew

Certificate of Publication

B26605
(3)

THE DAILY RECORD
Filed *16* day of *April* 192*4*

THE DAILY RECORD

J. Steward Davis & George W. Evans,
Solicitors,
215 St. Paul Place.

IN THE CIRCUIT COURT OF BALTIMORE CITY—(B—127—1924).— William H. Chew vs. Susie B. Chew.

ORDER OF PUBLICATION.

The object of this bill is to procure a divorce a vinculo matrimonii by the plaintiff from the defendant.

The bill states that the parties were married on the 6th day of October, 1914, and that they lived together until about the 17th day of October, 1918, when the defendant deserted the plaintiff. That there are no children as issue of said marriage. That the defendant is a non-resident of the State of Maryland, and when last heard of was in Atlantic City, New Jersey. That the defendant deserted the plaintiff without any just cause or reason and has declared her intentions to live with him no longer, that said abandonment has continued uninterruptedly for more than three years and is deliberate and final, and the separation of the parties is beyond any reasonable hope of reconciliation. That the defendant has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned men and said offense has not been condoned by your orator. That the plaintiff has been a citizen of the State of Maryland for more than three years prior to the filing of this bill of complaint.

It is thereupon this 21st day of February, 1924, ordered by the Circuit Court of Baltimore City that the plaintiff by causing a copy of this order to be published in Baltimore City once in each of four successive weeks, before the 26th day of March, 1924, 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 14th day of April, 1924, to show cause, if any she may have, why a decree should not be passed as prayed.

CHARLES F. STEIN,

True Copy—Test:

CHAS. R. WHITEFORD,

Clerk.

f22,29mh7,14

Baltimore, MAR 14 1924, 192.....

We hereby certify that the annexed advertisement of Order Publication Circuit Court

of Baltimore City, Case of

William H. Chew
vs. Susie B. Chew

was published in THE DAILY RECORD, a daily newspaper published in the City of Baltimore, once in each of

Four successive weeks before the 26th day of March, 1924.

First insertion Feb 22nd, 1924.

THE DAILY RECORD

Per Alexander W. Ritzel

127

1924

B64

Docket

Ct. Ct.

Chew

vs.

Chew

Decree Pro Confesso.

B26605

No.

(4)

Sapp

Filed

16 April

1924

Wm H Chew
vs.
Susie B Chew

IN THE
Circuit Court
OF
BALTIMORE CITY.

March

Term, 1924

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 16th day of April in the year nineteen hundred and twenty four 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.

Wm H Chew

3/13/61

Doc. B $\frac{127}{1924}$

**In the Circuit Court,
OF BALTIMORE CITY**

DEPOSITIONS

William H. Chew

vs.

Susie B. Chew

No. 26605 B

PLAINTIFF'S COSTS

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

DEFENDANT'S COSTS

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

William H. Chew

.....

vs.

Lucie B. Chew

.....

In the Circuit Court

OF BALTIMORE CITY.

A Decree Pro Confesso having been passed in said cause and notice having been given me by the Solicitor for the *plaintiff* of a desire to take testimony in the same, I, A. de RUSSY SAPPINGTON, one of the Standing Examiners of the Circuit Courts of Baltimore City, under and by virtue of an order of the above named Circuit Court, passed in said cause on the *sixteenth* day of *April* 19*24*, met on the *eighteenth* day of *May* in the year nineteen hundred and *twenty-six* at my office, in the city of Baltimore, in the State of Maryland, and assigned the *nineteenth* day of *May* in the same year at *twelve-thirty* o'clock in the *after* - noon and the office of *J. Stewart Davis 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:—

8-4-k

WILLIAM H. CHEW

VS.

SUSIE B. CHEW.

Testimony taken before me, A.deRussy
Sappington, Examiner, at the offices of J.S.Davis, on
May 19, 1926, at 12.30 o'clock in the afternoon.

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Thereupon---

WILLIAM H. CHEW,

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 State your name, residence and occupation

A William H. Chew, 5354 Decmore Avenue, postal
employee.

Q Do you know the parties to this suit?

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

By Mr. Davis:

Q When, where and by whom were you married?

A In Washington, D.C. on October 6, 1914, by a
Minister of the Gospel.

Q Are you living with your wife now?

A No, sir, she left me about October 17th, 1918.

Q Did you give her any just cause to leave you?

A No, sir.

Q Since your marriage have you been a kind, affectionate and faithful husband?

A I have.

Q State the circumstances surrounding the separation?

A I was in the Army and went away and I came home in July, 1918---we were living at Atlantic City then, and then I left and returned in October and she had broken up housekeeping and was gone. I made inquiries about her and I was told she went to New York.

Q Have you seen her since the separation?

A Once. I asked her to come back and live with me and she refused.

Q Where---Is your wife, the defendant a resident of the State of Maryland?

A No, sir.

Q Where was she when you last heard of her?

A I last saw her in Atlantic City, N.J., but I heard she was living in New York from other people.

Q How long have you been a resident of the City of Baltimore, State of Maryland?

A For the last five years.

Q Are there any children as result of your marriage

A No, sir.

Q Has the separation continued uninterruptedly for

more than three years prior to the filing of this bill?

A Yes, sir.

Q Was her going her own deliberate and final act?

A It was.

Q Is there any hope of 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.--- *W. W. Chew.*

The reupon---

GENEVA CLARK,

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 Geneva Clark, 550 Dolphin St., dressmaker.

Q Do you know the parties to this suit?

A I do.

By Mr. Davis:

Q Were they married and did they live together at one time as husband and wife?

A Yes, sir.

Q Were they known and recognized in the community in which they lived as such?

A Yes, sir.

Q Since the marriage has Mr. Chew been a kind, affectionate and faithful husband?

A He has.

Q Did he give his wife any just cause to abandon him?

A No, sir.

Q When did she abandon him?

A In the middle of October, 1918. He came back from the Army and found that she had broken up house-keeping and left no word for him.

Q Do you know that he saw her and tried to get her to come back to him?

A Yes, sir, he did, and she refused to come.

Q Are there any children as result of this marriage?

A No, sir.

Q Has this separation continued uninterruptedly for more than three years prior to the filing of this bill?

A It has.

Q Is the separation deliberate and final and beyond any reasonable hope or expectation of reconciliation?

A Yes, sir.

Q How long has Mr. Chew been a resident of the City of Baltimore, State of Maryland?

A For the last five years. He has been a resident here all his life except during the War.

Q Is the defendant a resident of the State of Maryland?

A No, sir.

Q Where was she when you last heard of her?

A In Atlantic City, New Jersey. That is where she left him.

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

General B. Clark

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.....day of.....in the year of Our Lord nineteen hundred and.....at the City of Baltimore, in the State of Maryland.

..... (SEAL).
Examiner.

There are.....*two*.....Exhibits with these depositions, to wit:
Plaintiff's..... Exhibit.....
.....
.....
Defendant's..... Exhibit.....

.....
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.....

.....
Examiner.

Ret'd for safe keeping