

IN THE CIRCUIT COURT

OF *78516*

BALTIMORE

CITY

*1920*

ADDIE CLEMENTS

VS.

ROBERT CLEMENTS.

Bill for Divorce

a vinculo matrimonii.

Mr. Clerk,

Please file,

*Davis & Bishop*

Solicitors for Plaintiff.

*321467*

DAVIS & BISHOP  
ATTORNEYS AT LAW

18 CALVERT STREET  
BALTIMORE, MD.

*Ad 2 August 1920*

Addie Clements

In The Circuit Court

vs.

of

Robert Clements

Baltimore City.

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To The Honorable, The Judge of Said Court:

Your Oratrix, complaining, respectfully says:

FIRST, That the parties hereto were married in Indian Head, Maryland, January 29th., 1902., by Rev. Smith, a Methodist minister, and lived together as man and wife until on or about July 6th. 1911.

SECOND, That Your Oratrix 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 state and when last heard of was in Washington D.C.

THIRD; That though the conduct of your Oratrix towards her husband has always been kind, affectionate and above reproach, he, without any just cause or reason abandoned and deserted her, and has declared his intentions to live with her 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.

FOURTH, That Your Oratrix has never condoned nor forgiven the said desertion, that she has never co-habited with the said Respondent since the desertion.

FIFTH, That there is one child born as a result of this marriage, Evelyn, age sixteen years.

WHEREFORE YOUR ORATRIX PRAYS:

- a- A divorce a vinculo matrimonii from the Respondent.
- b- Custody of the child, Evelyn.
- c- Such other and further relief as the case may require.

May it please Your Honor, to grant unto Your Oratrix, an order of publication, setting forth the nature and substance of this Bill and warning the said Respondent 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.

And as in duty Bound etc.

Addie Clements  
Complainant

Dana J. Bishop  
Solicitors for Complainant.

State of Maryland )  
                          ) To Wit:  
Baltimore City     )

I hereby certify that on this 26<sup>th</sup> day of August, before me, the subscriber, a Notary Public, in and for Baltimore City, State of Maryland, personally appeared Addie Clements, the Complainant 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 her knowledge and belief.

C. H. [Signature]  
Notary Public.

have, why a decree should not be granted as prayed.

on or before the 15th day of October, 1920, to show cause if and he may

having him before and report to the court in person or by solicitor,

respondent, Robert Clements, or the object of the substance of this bill,

the 15th day of October, 1920, at five o'clock in the afternoon

in the City of Baltimore, once a week for four consecutive weeks before

copy of this order to be inserted in some daily newspaper, published

ordered that on the day of execution, that the complaint be returned a

It is prescribed by the Circuit Court of Baltimore City,

that as a result of this marriage, within the sixteen years,

with the said respondent since the date of the said divorce, that there is one child

conferred upon himself the said respondent, that she has never cohabited

hope or expectation of reconciliation. That the complainant has never

Bill of Complaint, was deliberate and final and beyond any reasonable

understandably for more than three years prior to the filing of this

to live with her no longer; that such a separation was continued

of reason and abandoned and deserted her, and has declared his intention

of her mind, affection, respect and support, and, without any just cause

of the conduct of the complainant towards her in violation of the

that the respondent is a non-resident of the City of Baltimore, D.C. That

last heard of her in Baltimore, D.C. That

the City of Baltimore, D.C. That

the City of Baltimore, D.C. That

the City of Baltimore, D.C. That

the City of Baltimore, D.C. That

Order of Publication  
B 516  
1920

Clements

Clements

Order of Publication

B 21467

(2)

Ad 30 Aug 1920

Evangel Clements,

Respondent, Robert Clements and for the custody of the infant child

a Vincent M. Clements, by the complainant, Aggie Clements, from the

The object of said bill is to procure a decree for a divorce

ORDER OF PUBLICATION: 21467

Aggie Clements vs. Robert Clements,

In the Circuit Court of Baltimore City.

DAVIS & BIRNBY, SOLICITORS,  
115 E. Lexington St.

In The Circuit Court of Baltimore City.

Addie Clements vs. Robert Clements.

ORDER OF PUBLICATION:

The object of this suit is to procure a decree for a divorce a vinculo a vinculo matrimonii, by the Complainant, Addie Clements, from the Respondent, Robert Clements and for the custody of the minor child Evelyn Clements.

The bill states that the parties thereto were married in Indian Head, Maryland, January 29th., 1902 by Rev. Smith, a Methodist minister, and lived together as man and wife until on or about July 6th., 1911. That the Complainant 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 this city and state and when last heard of was in Washington, D.C. That though the conduct of the Complainant towards her husband has always been kind, affectionate and above reproach, he, without any just cause or reason abandoned and deserted her, and has declared his intentions to live with her no longer; that such abandonment has continued uninterruptedly for more than three years prior to the filing of this Bill of Complaint, was deliberate and final and beyond any reasonable hope or expectation of reconciliation. That the Complainant has never condoned nor forgiven the said desertion, that she has never co-habited with the said Respondent since the desertion. That there is one child born as a result of this marriage, Evelyn, age sixteen years.

It is thereupon by the Circuit Court of Baltimore City, ordered this 30<sup>th</sup> day of August 1920, that the Complainant 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 30<sup>th</sup> day of September 1920; and give notice to the said absent Respondent, Robert Clements, of the object and substance of this bill, warning him to be and appear in this Court in person or by solicitor, on or before the 16<sup>th</sup> day of October 1920, to show cause if any he may have, why a decree should not be passed as prayed.

Original  
B. 516  
1920  
Carroll T. Bond

192 <sup>56</sup> Dec Docket No. ....

*Clements*

vs.

*Clements*

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Certificate of Publication

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B 21 467  
(3)

THE DAILY RECORD.

Filed *16* day of *Oct* 192 *0*

Hearing of alimony and attachment cases. Filed for record September 21

THE DAILY RECORD

# THE DAILY RECORD

85-1

## Fourth Insertion.

Davis & Bishop, Solicitors,  
118 E. Lexington Street.

IN THE CIRCUIT COURT OF BALTI-  
MORE CITY — (B—516—1920) — Addie  
Clements vs. Robert Clements.

### ORDER OF PUBLICATION.

The object of this suit is to procure a decree for a divorce a vinculo matrimonii by the complainant, Addie Clements, from the respondent, Robert Clements, and for the custody of the minor child, Evelyn Clements.

The bill states that the parties thereto were married in Indian Head, Maryland, January 29th, 1902, by Rev. Smith, a Methodist minister, and lived together as man and wife until on or about July 6th, 1911. That the complainant 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 this city and state, and when last heard of was in Washington, D. C. That though the conduct of the complainant towards her husband has always been kind, affectionate and above reproach, he, without any just cause or reason abandoned and deserted her, and has declared his intentions to live with her no longer; that such abandonment has continued uninterruptedly for more than three years prior to the filing of this bill of complaint, was deliberate and final and beyond any reasonable hope or expectation of reconciliation. That the complainant has never condoned nor forgiven the said desertion, that she has never cohabited with the said respondent since the desertion. That there is one child born as a result of this marriage, Evelyn, age sixteen years.

It is thereupon by the Circuit Court of Baltimore City, ordered, this 30th day of August, 1920, that the complainant, 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 30th day of September, 1920, give notice to the said absent respondent, Robert Clements, of the object and substance of this bill, warning him to be and appear in this Court, in person or by solicitor, on or before the 16th day of October, 1920, to show cause, if any he may have, why a decree should not be passed as prayed.

CARROLL T. BOND.

True copy—Test:

CHAS. R. WHITEFORD,

au31s7,14,21

Clerk

Baltimore, SEP 21 1920, 192

We hereby certify that the annexed advertise-  
ment of Order Publication Circuit Court

of Baltimore City, Case of

Addie Clements

vs.

Robert Clements

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

30th day of September, 1920

First insertion August, 31st, 1920

THE DAILY RECORD.

Per Thaddeus W. Crapster

470

516 Blev Ct. Ct.  
1910 Docket

Addie Clements

vs.

Robert Clements

**Decree Pro Confesso.**

*[Handwritten signature]*

No.

321467

(4)

Filed 18 Oct 1910





*Addie Clements*

vs.

*Robert Clements*

IN THE  
**Circuit Court**  
OF  
BALTIMORE CITY.

*September*

*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 *18<sup>th</sup>* day of *October* 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 J. Stanton*

STATE OF MARYLAND,

BALTIMORE CITY, SCT:

I hereby certify that on this *18<sup>th</sup>* day of *October* 19*20* before me, the subscriber, a Notary Public, of the State of Maryland, in and for the City aforesaid, personally appeared *Addie Clements* 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.

X *Addie Clements*

*Arthur H. Royer*  
Notary Public.



2/12/13/31

Doc. B 516  
1920

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

**DEPOSITIONS**

*Addie Clementis*

*vs.*  
*Robert Clementis*

No. 21467B

**PLAINTIFF'S COSTS**

Examiners ..... \$ 5.00

Copies ..... \_\_\_\_\_

Sheriff ..... \_\_\_\_\_

Stenographer ..... \_\_\_\_\_

\$ 5.00

**DEFENDANT'S COSTS**

Examiners ..... \$ \_\_\_\_\_

Copies ..... \_\_\_\_\_

Sheriff ..... \_\_\_\_\_

Stenographer ..... \_\_\_\_\_

*fdg* 1920

Addie Clementis

.....

vs.  
Robert Clementis

.....

In the Circuit Court \_\_\_\_\_

OF BALTIMORE CITY.

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

eighteenth day of October 1920, met on

the nineteenth day of October in the year nineteen

hundred and twenty at my office, in the City of Baltimore, in the State

of Maryland, and assigned the twentieth day of October

in the same year at four-thirty o'clock in the after-noon and the

office of Messrs Davis & Bishop in the City and State

aforsaid, 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:—

**CLEMENTS**

**vs**

**CLEMENTS**

-----  
Testimony taken at the office of Messrs. Davis and Bishop, 118 E. Lexington Street, Baltimore, Maryland, on the 20th day of October, 1920, at 4:30 P. M.  
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ADDIE CLEMENTS, the Plaintiff, in this case, produced on her own behalf, having been first duly sworn, deposeeth and saith as follows, that is to say:

BY THE EXAMINER:

- 1 Q. State your name, residence and occupation?  
A. Addie Clements, 1408 McCulloh Street. Domestic.
- 2 Q. Do you know the parties to this suit?  
A. I am the Plaintiff, and the Defendant is my husband.

BY MR. BISHOP:

- 1 Q. When, where and by whom were you married?  
A. January 29th, 1902 at Indian Head, Maryland, by the Reverend Mr. Smith, a Methodist Minister and we lived together until July 6th, 1911.
- 2 Q. What took place then?  
A. He staid out all night and came back the next morning and I asked him where he had been and he said that

Addie Clements:

-2-

he had staid out all night with a woman and that he did not care. We then had words of course, and then he left and took what he wanted with him.

3 Q. Since July 6, 1911 have you and your husband lived or cohabited together?

A. No.

4 Q. How long have you lived in the City of Baltimore State of Maryland?

A. Eight years.

5 Q. Where does your husband reside?

A. The last I heard of him he lived in Washington,

D. C.

6 Q. He is not a resident of the State of Maryland?

No. He is not.

A.

7 Q. What was your conduct towards your husband?

A. I was kind and affectionate to my husband, and my conduct was above reproach.

8 Q. Did you give him any just cause or reason to desert you?

A. No.

9 Q. He has declared his intention to live with you no longer?

A. Yes.

10 Q. And the abandonment has continued uninterruptedly

Addie Clements:

-3-

for more than three years prior to the filing of your Bill?

A. Yes.

11 Q. Is there any hope or expectation of your ever living together again?

A. No. The abandonment was his deliberate and final act.

12 Q. Were any children born of this marriage?

A. Yes, one. Evelyn Clements, Sixteen years.

13 Q. Do you desire the custody of your child?

A. Yes. I have taken care of it and am able to do so.

14 Q. Since the desertion have you condoned or forgiven the desertion or lived or cohabited with your husband?

A. No.

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.

Addie Clements -

ROSA SEAGLES, a witness of lawful age produced on behalf of the Plaintiff, having been first duly sworn, deposeseth and saith as follows, that is to say.

BY THE EXAMINER:

1 Q. State your name, residence and occupation.

A. Rosa Seagles, 1317 Rhodes Island, Washington, D.C. Janitress.

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

A. Yes. All my life. Mrs. Clements is my sister.

BY MR. BISHOP:

1 Q. Were you present at the wedding?

A. No, but I know they were married. They lived together as married people, and their friends and acquaintances and family accepted them as married people.

2 Q. You spent considerable time in the home of Mr. and Mrs. Clements during their married life?

A. Yes.

3 Q. You were present in July, 1911 about the time they had their disagreement?

A. I was out at work, but I was living at their house at that time.

4 Q. Which left the other?

A. He left her; I think it was July 6th.

5 Q. But you saw that he left her?

A. Yes, I know that.

6 Q. How long has your sister lived in Baltimore City, Maryland?



A. Eight years, and she lives here now.

7 Q. Where does her husband live?

A. The last time I saw him he was living in Washington, C. C., and I think he lives there still.

8 Q. He is a non-resident of the State of Maryland then?

A. Yes.

9 Q. What was your sister's conduct towards her husband?

A. She was everything that a wife would be expected to do.

10 Q. Did your sister give him any cause to abandon or desert her?

A. No.

11 Q. Has the abandonment and desertion of the Plaintiff by the Defendant continued uninterruptedly for more than three years prior to the filing of the Bill in this case?

A. Yes.

12 Q. In your opinion is the separation deliberate and final and beyond any reasonable hope of a reconciliation?

A. Yes. He has told me that he did not intend to live with her again.

13 Q. Were there any children born as the result of this marriage?

A. One child. Evelyn Clements, sixteen years old.

Rosa Seagles.

-7-

14 Q. Who has the custody of this child?

A. Her mother.

15 Q. Which parent is the proper one to have the child?

A. The mother. She has taken care of it and is able to do so.

16 Q. As far as you know has your sister ever lived or cohabited with her husband since the desertion?

A. No. She has not and she has not forgiven 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.

Rosa Scaples.

BURNETTE CHISTOM, 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. Burnette Chistom, 1408 McCulloh Street. Domestic.

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

A. Yes. For about fifteen years.

BY MR. BISHOP:

1 Q. What relation exists between them?

A. They are husband and wife, they both told me and I have seen their certificate. They lived together as husband and wife.

2 Q. Are they living together now?

A. No.

3 Q. Which left the other?

A. Mr. Clements left her .

4 Q. What happened the day he left?

A. When I came down that morning, he was not there, but shortly after he came in Mrs. Clements asked him where he had been and he said he had been out with "His Woman". Then they had a fuss of course and he took his things and left. He said he was not going to pay any more rent.

5 Q. When was that?

A. July 6th, 1911.

6 Q. Since that time have they ever lived together again.

A. No.

7 Q. What was her conduct towards him?

A. She was a good true and loving wife ever since I knew them.

8 Q. Did she give him any just cause or reason to desert her?

A. No.

9 Q. How long has she lived in Baltimore, Maryland?

A. Eight years and she still lives here.

10 Q. Where does he live?

A. He was in Washington, D. C. the last I heard of him.

11 Q. Then he is not a resident of the State of Maryland?

A. No.

12 Q. Has the abandonment and desertion continued uninterruptedly for more than three years prior to the filing of the Bill in this case?

A. Yes. It has been about nine years.

13 Q. In your opinion is the separation deliberate and

A. Yes.

14 Q. Since the separation in July, 1911, has Mrs. Clenentis lived or cohabited with her husband?

A. No.

15 Q. Were any children born of this marriage?

A. Yes. One Child, Evelyn Clements, sixteen years old.

16 Q. Who has her custody?

A. The mother. She has taken care of the child and is able to do so.

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,

Burnett's *Chittah*

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 9th day of November in the year of Our Lord nineteen hundred and Twenty.....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.



Circuit Court

516 *Blev*  
19 20 Docket No. ....

*Clements*

vs.

*Clements*

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Order of Reference  
and Report

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*Coe*

*B* *21467*  
No. ....

*(6)*

Order Filed *19* day of *Nov* 19*70*

Report Filed *20* day of *Nov* 19*70*

B 516

Addie Clements

IN THE

Circuit Court

vs.  
Robert Clements

OF

BALTIMORE CITY

now Term, 19 20

This case being submitted, without argument, it is ordered by the Court, this 19 day of November, 19 20, that the same be and it is hereby referred to Ward B. Coe, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Robert J. Stanton

Report of Auditor and Master

Bill for divorce a vinculo matrimonii and for the custody of the minor child of the parties filed by the wife against her husband on the ground of abandonment. Code 1911, Art. 16, secs. 36-41.

Defendant proceeded against as a non-resident and his 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.

Case made for giving the custody of the minor child to the plaintiff.

A decree pro confesso was passed against the defendant and more than thirty days have since elapsed.

Case ready for decree.

Ward B. Coe  
Auditor and Master.

Fee \$9 paid.

November 19th, 1920.

1294

# CIRCUIT COURT

B-516-

1920.

No. 60 Docket

ADDIE CLEMENTS

VS.

ROBERT CLEMENTS.

## Decree of Divorce

B 21467  
B No. ....

7

fd 6<sup>th</sup> December 1920

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

*Maud B. Cox*  
Auditor and Master.

IN THE

# Circuit Court

OF

BALTIMORE CITY

ADDIE CLEMENTS

VS.

ROBERT CLEMENTS

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 15th day of December, A. D. 1920, by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said - - - - - Addie Clements - - - - -

the above named Complainant be and she is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, the said Robert Clements.

AND IT IS FURTHER ORDERED that said complainant shall have the guardianship and custody of Evelyn Clements, the minor child of the parties in the proceedings mentioned, until the further order of this Court.

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

*Robert F. Stanton*