

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

*B 349
1926*

JOSEPH P. GOUGH

VS.

GRACE GOUGH

1416 Regent St

BILL FOR DIVORCE

B 30931

Mr. Clerk:-

Please file.

Davis & Evans
ATTORNEYS FOR PLAINTIFF.

DAVIS & EVANS
ATTORNEYS AT LAW

Filed Aug 1926

JOSEPH P. GOUGH

:

IN THE CIRCUIT COURT

VS.

:

OF

GRACE GOUGH

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

1. That he was married to his wife, Grace Gough on the 11th day of May, 1915 and with whom he resided until the 16th day of November, 1920.
2. That ever since said marriage your Orator has behaved himself as a faithful, chaste and affectionate husband toward the said Grace Gough.
3. That the said Grace Gough has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned men, whose names are unknown to your Orator, 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 he discovered her said adulteries.
5. That there is one child, Mary L. Gough, age eight years born as result of said marriage.
6. That both your Orator and the defendant are citizens 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 Matrimonii from the said Grace Gough.
- (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 Writ of Subpoena directed against the said Grace Gough,
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.

Rain & Swaney

ATTORNEYS FOR PLAINTIFF.

9720

Ct. Ct.

B 349
192 6 Docket No.

Joseph P. Gough

vs.

Grace Gough

no such address
1416 Reggs Ave

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B 30931
(2) (3)

Filed *13 Sept*, 192*6*
" *11 Oct*, 19*26*

Davis & Evans SOLICITOR

14

John E. Collier
Sheriff

13 Sept 1926

REISSUED TO *October* Return Day, 1926
Chas R Whitford
Clerk
John E. Collier
Sheriff

Nov Est
(Kaylor)

Nov Est
(Kaylor)

EQUITY SUBPOENA

The State of Maryland

To Grace Gough
1416 Riggs Ave.

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

Joseph P. Gough

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 12th day of July 1926
Issued the 9th day of August, in the year 1926

Char. R. Whelton 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.

Ct. Ct.

192

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed....., 192....

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

To Grace Gough
1416 Riggs Ave.

(copy)

REISSUED TO October Return Day, 1926
Chas R Whiteford
Clerk
13 Sept 1926

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Chas R Whiteford 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.

IN THE CIRCUIT COURT OF
BALTIMORE CITY

B 349 *349*
1926 *1926*

JOSEPH P. GOUGH

VS.

GRACE GOUGH

B 30931

(4)
ORDER OF PUBLICATION

Mr. Clerk:-

Please file.

Davis & Evans.

ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

Fd 22 Oct 1926

DAVIS & EVANS, SOLICITORS,
215 St. Paul Place,
IN THE CIRCUIT COURT OF BALTIMORE CITY
JOSEPH P. GOUGH VS. GRACE GOUGH
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 11th day of May, 1915 and lived together until the 16th day of November, 1920. 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. That ever since said marriage your Orator has behaved himself as a faithful, chaste and affectionate husband toward the said Grace Gough. That the said Grace Gough has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned men, whose names are unknown to your Orator and said offense has not been condoned by your Orator. That your Orator has not lived or co-habited with the said defendant since said adulteries were discovered. That there is one child, Mary E. Gough, age eight years born as result of said marriage.

It is thereupon ordered by the Circuit Court of Baltimore City this *22* 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 *22* 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 *9*th day of *December* 1926. to show cause, if any she may have, why a decree should not be passed as aforesaid.

Critchley

THE DAILY RECORD

Baltimore, NOV 13 1926, 192

Davis & Evans, Solicitors,
215 St. Paul Place,
IN THE CIRCUIT COURT OF BALTI-
MORE CITY—(B-349-1926)—Joseph P.
Gough vs. Grace Gough.

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 11th day of May, 1915, and lived together until the 16th day of November, 1920. 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. That ever since said marriage your orator has behaved himself as a faithful, chaste and affectionate husband toward the said Grace Gough. That the said Grace Gough has on divers days and times since said marriage committed the crime of adultery with divers lewd and abandoned men, whose names are unknown to your orator, and said offense has not been condoned by your orator. That your orator has not lived or co-habited with the said defendant since said adulteries were discovered. That there is one child, Mary L. Gough, age eight years, born as result of said marriage.

It is thereupon ordered by the Circuit Court of Baltimore City this 22nd 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 22nd 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 9th 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:

CHAS. R. WHITEFORD,

Clerk.

o23,30,n6,13

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

of Baltimore City, Case of

Joseph P. Gough
vs. Grace Gough

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

four successive weeks before the 22nd day of November, 1926.

First insertion October 23rd, 1926.

THE DAILY RECORD

Per George C. Law

192.....

Docket No.

B349
1926

Gough

vs.

Gough

Certificate of Publication

B 30931
157

THE DAILY RECORD

Filed *17* day of *July* 192*8*.

B349

Ct. Ct.

1926

Docket

Joseph Gough

vs.

Grace Gough

Decree Pro Confesso

Dapp

B No. 30931
[6]

Filed

17 July

1928

Joseph P Gough

vs.

Grace Gough

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

Term, 192

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 17th day of July in the year nineteen hundred and twenty eight 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.

Let the testimony taken Jan. 6, 1927 be considered mine pro tunc as of today

H. Arthur Plump

Doc. 66 B ³⁴⁹/₁₉₂₆

3/13/38

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Joseph Gough
vs.
Grace Gough

No. 30931 B

PLAINTIFF'S COSTS

Examiners \$
Copies
Sheriff
Stenographer
\$ _____

DEFENDANT'S COSTS

Examiners \$
Copies
Sheriff
Stenographer
\$ _____

Ad 30th July 1928

.....
Joseph Gough
.....

vs.

.....
Grace Gough
.....
.....

In the Circuit Court.....

OF BALTIMORE CITY.

A Decree Pro Confesso having been passed in the above 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
seventeenth ^(nunc pro tunc) day of **July** 19**28**, met on
the **sixth** day of **January** in the year nineteen
hundred and **twenty-seven** at my office, in the city of Baltimore, in the State
of Maryland, and assigned the **sixth** day of **January**
in the same year at **1:30** o'clock in the **after-**noon and the
office of **A. deRussy Sappington, Esquire,** 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:—

8-4-1
B

JOSEPH P. GOUGH

VS.

GRACE GOUGH.

Testimony taken before me, A. deRussy Sappington, Examiner, at my offices in the Title Bldg, Baltimore, Md. on January 6, 1927, at 1.30 o'clock in the afternoon.

Mr. George Evans appeared for the Plaintiff.

Thereupon---

JOSEPH P. GOUGH,

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 Joseph P. Gough, 832 Harlem Avenue, helper.

Q Do you know the parties to this suit?

A I am the plaintiff and the defendant is my wife

By Mr. Evans:

Q When, where and by whom were you married?

A May 11, 1915, at Denton, Carolina County, Md.

by Reverend Baker, a Minister of the Gospel.

Q Are you living with your wife now?

A No, sir, she left me in November, 1920.

Q Were you always a kind, affectionate and faithful husband?

A I was. I accused her of being guilty of adultery and she left.

Q Have you any personal knowledge of her adultery?

A Yes. She is now living with a man named Matthews at 1614 Riggs Avenue, and when she left me she was running with a man by whom she had a child. And she has had three children by this man Matthews.

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 bill?

A Yes, sir.

Q Are there any children as result of your marriage?

A One, Mary Lena Gough. She is with her mother, and I am satisfied for her to keep her at present.

Q Since you found out that your wife was guilty of adultery, have you lived or cohabited with her?

A No, sir.

Q Have you forgiven or condoned her
offense?

A I have not.

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 Joseph P. Young

Thereupon---

CARRIE WALLACE,

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 Carrie Wallace, 1123 Whatcoat St., no occupation

Q Do you know the parties to this suit?

A Yes; I have known them all my life.

By Mr. Evans:

Q Were you present at their wedding?

A I was. They were married in Denton, Md. in 1915, by Reverend Baker, a Minister of the Gospel. They lived in Denton about a year and then came to Baltimore and have been living here ever since.

Q Are they living together now?

A No, sir. She left him in November, 1920 and went off with a man named Russell, and went with him for a time, and then went with a man named Matthews. She had one child by Russell, and has had three by Matthews, with whom she lives now at 1614 Riggs Avenue.

I have visited them and seen them living together, and they both acknowledge the three children.

Q Since Mr. Gough found out that his wife was guilty of adultery, has he ever lived or cohabited with her?

A No, sir.

Q Has he forgiven or condoned her offense in any way?

A No, sir.

Q Has the plaintiff been a resident of the City of Baltimore, State of Maryland for more than two years prior to the filing of this bill?

A Yes, sir.

Q You know there was one child born to Mr. and Mrs. Gough, and the child is now in the custody of the Mother?

A Yes, sir, I do.

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*

Carol Wallace

Friday, April 7, 1933.

Thereupon---

JOSEPH P. GOUGH,

the plaintiff, to this case, heretofore produced and sworn, having been recalled, testified as follows:

By Mr. Evans:

Q Mr. Gough, you filed a Bill against your wife for a divorce in August of 1926, and took testimony in that case on the sixth of January, 1927. Have you lived or co-habited with Mrs. Gough since the taking of that testimony?

A No, sir.

Q Have you seen Mrs. Gough since that testimony was taken?

A No, sir.

Q Do you know where Mrs. Gough is at the present time?

A No, sir, I do not.

Q May I ask you when was the last time that you saw Mrs. Gough?

A The last time I saw Mrs. Gough is hard to say, because it was sometime before I filed this suit, around six months before that time.

Q I want to ask you, when Mrs. Gough was living with this man was she permanently residing at any particular

address or was she kind of a bird of passage?

A She moved around quite a bit.

Q Did she live at one place very long?

A No, sir, she never lived any place very long.

Q Are you a resident of Baltimore City, State of Maryland?

A Yes, sir.

Q How long have you been so?

A I guess about twenty-five years.

Q Have you lived here continuously since your previous testimony on January 6th, 1927?

A Yes, sir, I have never lived any other place.

Q There seems to be some discrepancy in the address in the summons and in the original testimony. Can you explain the discrepancy with regard to the address given in the summons as 1416 Riggs Avenue. Did you know the exact address or did you know she lived in that block?

A I know she lived in that block about that address.

Q Was that the last block or address that you knew she lived in at the time the summons was issued for her in August, 1926?

A Yes, sir.

Q Do you know whether she continued to live in

that block very long?

A I heard that she didn't live there so long.

Q Did you visit Mrs. Gough at the address on Riggs Avenue?

A No, sir.

Q So the address you gave was an address that was given you?

A Yes, sir.

Q There is some discrepancy in regard to the address given in the testimony. The testimony shows 1614 Riggs Avenue - Is that a mistake or is it not?

A It must be a mistake.

Q And what did you intend when you said 1614?

A I meant the 1400 block, between Calhoun and Whatcoat Streets.

- - - - -

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

Joseph Parran Gough

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 July in the year of Our Lord nineteen hundred and twenty-eight 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

349
1926

Docket No. 66B

Joseph P Gough
vs.

Grace Gough

Order of Reference
and Report

coe

6 No. 30931

171

Order Filed 30 day of July 1928
Report Filed 7 day of April 1933

Joseph P Gough

vs.

Mae Gough

IN THE
Circuit Court

OF
BALTIMORE CITY

July Term, 1928

This case being submitted, without argument, it is ordered by the Court, this 30th day of July 1928, that the same be and it is hereby referred to Ward B. Cox, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Charles F. Stewart

Report of Auditor and Master

Bill for divorce a vinculo matrimonii filed by the husband against his wife on the ground of adultery. Code Art. 16, secs. 37-42.

Defendant proceeded against by publication after two successive returns of "non est".

Residence of both parties in Baltimore City for more than two years proven.

The marriage proven.

The adultery proven.

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

Case ready for decree.

Ward B. Cox
Auditor and Master
April 7, 1933

CIRCUIT COURT

B 349
1926 No. 66 Docket

JOSEPH P. GOUGH

VS.

GRACE GOUGH

Decree of Divorce

Recorded

Folio 103 1933

B No. 30931

(8)

April 1933

Ed 8" ~~Mar~~

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

Ward B. Case
Auditor and Master.

JOSEPH P. GOUGH

Circuit Court

VS.

OF

BALTIMORE CITY

GRACE GOUGH

March Term, 193*3*

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

It is thereupon, this

8th

day of

April

, A. D. 193*3*

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said - - -

- - - - - JOSEPH P. GOUGH - - - - -

the above named Complainant be and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, the said GRACE GOUGH.

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

H. Arthur Plump