No. IN THE CIRCUIT COURT OF BALTIMORE CITY. JOSEPH P.GOUGH VS. GRACE GOUGH 1416 Aggs and BILL FOR DIVORCE Mr.Clerk:-Please file. Daint bun ATTORNEYS FOR PLAINTIFF. DAVIS & EVANS ATTORNEYS AT LAW N BAUMGARTEN & CO., INC.

JOSEPH P.GOUGH

#### IN THE CIRCUIT COURT

VS.

GRACE GOUGH

BALTIMORE CITY

OF

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

I. 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 Compleint.

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.

Dan FOR PLAINTIFF.

B 9 0 Ct. Ct. 192 <u>B 349</u> 192 6 Q3 Docket No. Joseph P. Gough vs. Grace Gough 1416 Riggs An BEISSUE SUBPOENA TO ANSWER BILL OF COMPLAINT B 30931 No. (2) 3 192. 1926 Filed 00 11 Davis & Evans SOLICITOR

# EQUITY SUBPOENA The State of Maryland

**On** 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

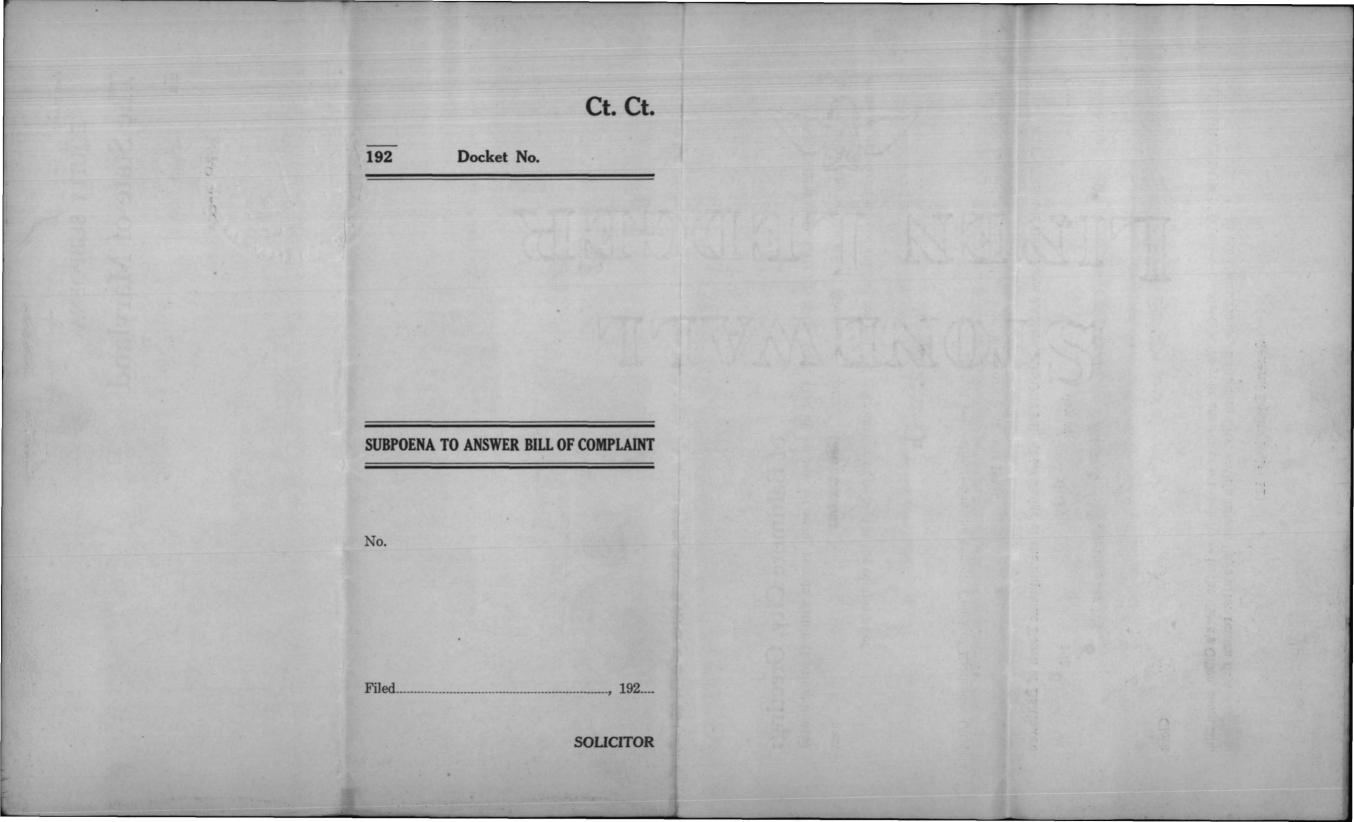
City, the		12"		day of	July		192 <b>6</b> 1926
Issued the	9 <b>n</b>		lay of	Augus	t	, in the year 192	6
	•				1		1

Chan Mholeford 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

Grace Gough

1416 Riggs Ave.

October 13 Jept 1926

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City, the 12 <sup>e</sup>			192 61 926			
Issued the	9 <b>°</b>	day of	August	, in the year 192	6	

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Chao/

(General Equity Rules 11)

IN THE CIRCUIT COURT OF BALTIMORE CITY 349 1924 JOSEPH P.GOUGH VS. GRACE GOUGH 30.931 ORDER OF PUBLICATION Mr.Clerk:-Please file. Davis Heraus. DAVIS & EVANS ATTORNEYS AT LAW BAUMGARTEN & CO., INC.

Stand Sta 349

### DAVIS & EVANS, SOLICITORS, EI5 St.Paul Place, IN THE CIRCUIT COURT OF EALTIMERE CITY JOSETH P.GOUCH VO.GRACE GOUGH ORDER OF FUELICATION

The object of this Bill is to procure a divorce A Vinculo Estrimonii by the plaintiff from the defondant.

The bill recitos that the parties were married on the IIth day of May, 1915 and lived together until the Lith day of November, 1920. That both parties are residents of Baltimore City but that two summons sent to the defendant's last known recidence have been returned non est by the Sheriff of Baltimore City. That ever since said marriage your Grater has behaved nimself as a faithful, chaste and affectionate husband toward the said Grace Cough. That the said Grace Cough has on divers days and times since said marriage, committed the crime of adultary with divers, level and abandened men, whose names are unknown to your truter and said offense has not been condened by your Grater. That your Grater has not lived or co-habited with the said defendant since said adultaries were discovered. That there is one child, Mary E.Gough, uge eight years bern as recult of said marriage.

It is thereupon ordered by the Circuit Court of Baltimore City this 22 day of Ottoms It20, that the plaintiff by causing a copy of this order to be inserted in some dealy nowspaper published in Baltimore City, once a week for four successive weeks, before the 22 day of Moscub 1920, give notice to the absent defendant of the object and substance of this bill, warning hor to be and appear in this Court in person or by Colicitor on or before the 9" day of Decembril926, to show cause, if any she may have, why a decree should not be passed as proved.

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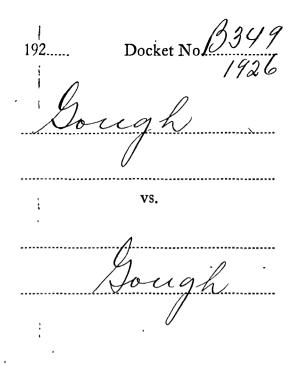
### THE DAILY RECORD

Baltimore, NOV 1 3 1926 192 Davis & Evans, Solicitors, 215 St. Paul Place, IN THE CIRCUIT COURT OF BALTI-MORE CITY-(B-349-1926)-Joseph P. We hereby certify that the annexed advertise-Gough vs. Grace Gough. ORDER OF PUBLICATION. The object of this bill is to procure a divorce a vinculo matrimonii by the plainment of Order Juffication Circuit Court tiff from the defendant. tiff from the detendant. The bill recites that the parties were married on the 11th day of May, 1915, and lived together until the 16th day of No-vember, 1920. That both parties are res-idents of Baltimore City but that two sum-mons 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 oration has be-.....of Baltimore City, Case of Hrugh the Sheriff of Baltimore City. That ever since sold marriage your orator has be-haved 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 maritage committed the crime of adultery with di-vers 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 defen-dant since said adulteries were discvered. That there is one child. Mary L. Gough. was published in THE DAILY RECORD, a daily newspaper published in the City of Baltimore, once in each of That there is one child, Mary L. Gough, age eight years, born as result of said It is thereupon ordered by the Circuit Court of Baltimore City this 22nd day of 2nd day of November, 1926 Court of Baltimore City this 22nd day of October, 1926, that the plaintiff. by caus-ing a copy of this order to be inserted in some dally newspaper published in Baltimore City, once a week for four suc-cessive 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 0th day of December, 1920, to show cause, if any she may have. THE DAILY RECORD 1920, to show cause, if any she may have, Per George b.d why a decree should not be passed as ELI FRANK. True Copy-Test: CHAS. R. WHITEFORD, Clerk.

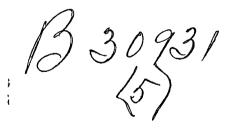
marriage.

prayed.

023,30,n6,13



## Certificate of Publication



<u>B349</u> 1926, Ct. Ct. Docket Joseph Jough Jose Jough **Decree Pro Confesso** B No. 30931 Filed 17 July 1928

vs.

CIRCUIT COURT

OF

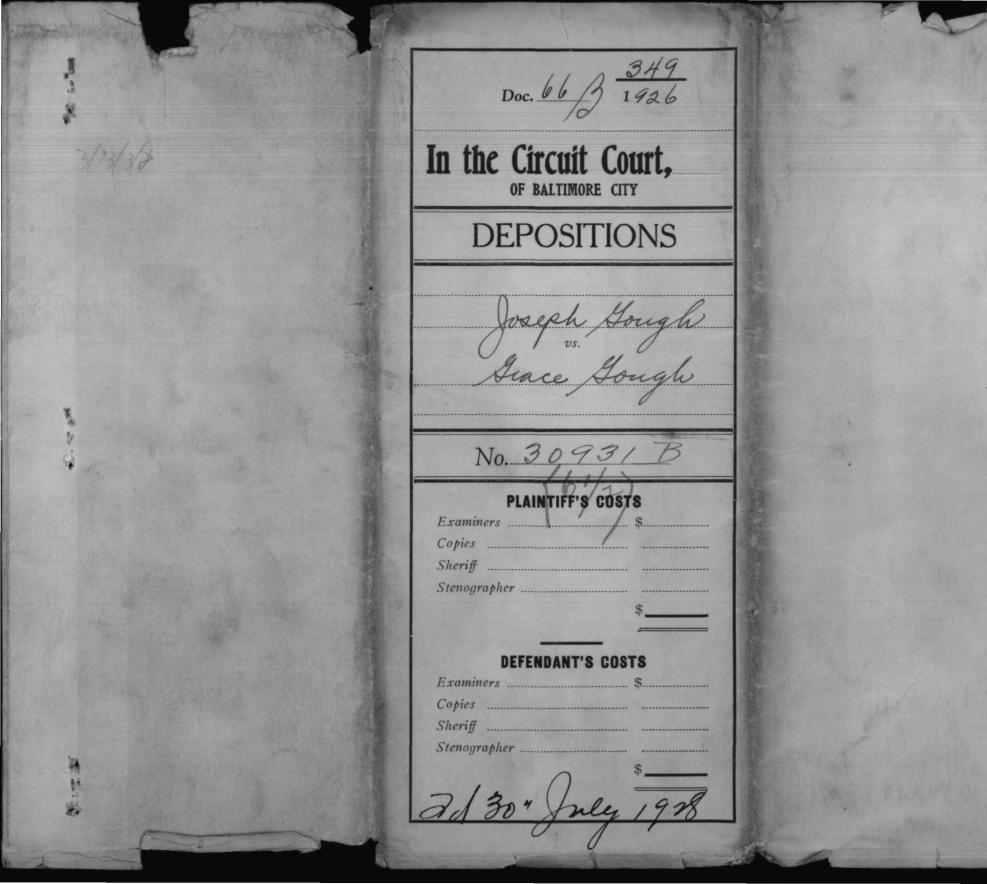
BALTIMORE CITY

### 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 summit, (said Order).

It is thereupon this hundred and twenty *Muffuli* 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.

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Joseph Gough vs.

In the Circuit Court

OF BALTIMORE CITY.

Grace Gough

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 sixth day of **January** in the year nineteen the..... hundred and twenty-seven at my office, in the city of Baltimore, in the State sixth .....day of **January** of Maryland, and assigned the..... 1:30 after-noon and the in the same year at..... A. deRussy Sappington, Esquire, in the City and State office of ..... 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 plaintiff to take the following depositions, that

is to say:---

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.

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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 whe 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 prpor 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?  $A^{\prime\prime}$  No, sir.

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Q Have you forgiven or condoned her offense?

A I have not.

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#### 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. .... 110 Jaseple P Grough

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.

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.

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I have visited them and seenthem 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.

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### 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 carel Walleel

#### 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 cohabited 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.

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#### 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.

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Jaset Parran Gaugh

Plaintiff's..... Exhibit..... Defendant's..... Exhibit ..... adulapprature Examiner.

adu Dappungting Examiner.

**Circuit Court** 349 Docket No. 63 1926 Salta S Joseph P. Jough vs. Mace gough Order of Reference and Report boe 6 No. 30931 Order Filed 30" day of hey 1978 Report Filed 7 day of april 1933

Joseph & Gough	IN THE			
ma gough	OF BALTIMORE CITY			
	rerm, 1925 ordered by the Court, this			
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. March B. C.M.
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/03 1933 B No. 3093/ 59 8" # 1935

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

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DECREE OF DIVORCE.

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IN THE

JOSEPH P. GOUGH	Circuit Court
VS.	OF BALTIMORE CITY
GRACE GOUGH	March Term, 193 3
This cause standing ready for hearing and being du	uly submitted, the proceedings were by the Court
read and considered. It is thereupon, this day	of April , A. D. 1933
by the Circuit Court of Baltimore City, Adjudged, Orde	ered and Decreed, that the said
JOSEPH P.	GOUGH
the above named Complainant be and he is hereby D	IVORCED A VINCULO MATRIMONII from the
Defendant, the said GRACE GOUGH.	
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