

In The Circuit Court
of

Baltimore City

Jessie Graham 1919

vs

Frank Graham

Deputy District Attorney

Not (book please file)

(~~Book~~) Jaws

B 20 340

(1)

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BALTIMORE, MD

A. S. [Signature] 1919

Jessie Graham

In The Circuit Court

Vs.

of

Frank Graham

Baltimore City.

To The Honorable, The Judge of said Court:

Your Oratrix, complaining, respectfully says:

FIRST, That the parties hereto were married on or about the seventeenth day of December-1899 by Dr. Lyons and lived together as man and wife until on or about June 10- 1910. Said marriage occurred in Baltimore City, State of Maryland.

SECOND, That both parties are residents of the ~~city of Baltimore~~, state of Maryland, and have been for more than two years prior to the filing of this bill of complaint.

THIRD, That though the conduct of Your Oratrix towards her husband has always been kind, affectionate, and above reproach, the respondent without any just cause or reason, was extremely cruel and barbarous in his treatment of your oratrix and upon divers days and occasions he did beat, kick and stabbed your Oratrix thus causing her to leave him; that the respondent has upon divers times and occasions committed adultery with one Evelyn Gross; that he has three children borne as a result of said adultery and that he is now living in open adultery with said Evelyn Gross. The above mention^{ed} desertion on the part of the respondent has continued uninterruptedly for more than three years prior to the filing of this bill of complaint and that there is no reasonable hope or expectation of reconciliation.

FOURTH, That Your Oratrix has never condoned said offenses.

FIFTH, That there are no children born as a result of said marriage Therefore YOUR ORATRIX PRAYS:

a-a A divorce a vinculo matrimonii from the respondent.

b-b Such other and further relief as the case may require.

WHEREFORE YOUR ORATRIX PRAYS:

That a decree be passed, divorcing Your Oratrix from the respondent, a vinculo matrimonii.

Such other and further releif as the case may require.

May it please Your Honor to grant unto Your Oratrix a writ of subpoena, directed unto the said respondent, commanding him to be or appear in this Court on some day certain, to be named therein, to perform such decree as may be passed in the premises.

As in duty bound etc.

x Jessie Graham
Complainant

(A. W. Paul)
Solicitor for Complainant.

813 B 09

Ct. Ct.

19 19

No.

Docket

Graham
Graham

SUBPOENA TO ANSWER BILL OF COMPLAINT

13

No.

20 340
(2)

Filed 13 Jan 1919
J. Stewart Davis
Solicitor

Received 23 day of Dec 1919
and forthwith delivered to the Sheriff of
Calvert County, Test:

Arthur A. Hansford ex

Sheriff
J. B. Johnson
of Calvert Co

EQUITY SUBPOENA

The State of Maryland

Un

Frank Graham

of *Calvert* County, 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 *January* 19 *20* to answer the complaint of

Jessie Graham

against you in said Court exhibited.

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

WITNESS the honorable MORRIS A. SUPER, Chief Judge of the Supreme Bench of Baltimore City, the *10* day of *November* 19 *19*

Issued the *22* day of *December* in the year 19 *19*

Clark Whiteford
Clerk

9. A.M.
12:00
still holds

359

8/3

19 19

No.

Ct. Ct.

Docket

Graham
Graham

SUBPOENA TO ANSWER BILL OF COMPLAINT

B

No.

20340

(2)

Filed

3 December 1919

J. Stewart Davis
Solicitor

J. B. Johnson
Shiff

Received 6th day of Dec, 1919
and forthwith delivered to the Court of
Calvert County, Test:
Arthur A. Harkness Clerk

EQUITY SUBPOENA

The State of Maryland

To

Frank Graham

Of *Calvert* County, 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 *December* 19 *19* to answer the complaint of

Jessie Graham

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 *December* 19 *19*

Issued the *3* day of *December* in the year 19 *19*

Cash Whitford
Clerk

Ct. Ct.

19

No.

Docket

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed

19

Solicitor

EQUITY SUBPOENA

The State of Maryland

To

Frank Graham



of *Calvert*

County, 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 *December* 19 *19* to answer the complaint of

Jesse Graham

against you in said Court exhibited.

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

WITNESS the honorable MORRIS A. SQPER, Chief Judge of the Supreme Bench of Baltimore City, the *10* day of *November* 19 *19*

Issued the

3

day of

December

in the year 19

19

Clark Whiteford
Clerk

813 R 9 Ct. Ct.
1919 Docket

81-2
Graham

vs.

Graham

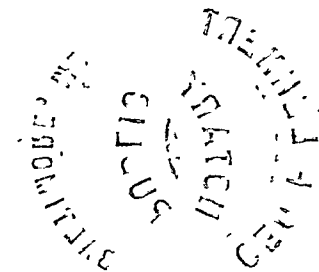
Decree Pro Confesso.

Jan

B 20340

No
(4)

Filed 29 July 1920



Jessie Graham

vs.

Frank Graham

Sept Jan'y

IN THE
Circuit Court
OF
BALTIMORE CITY.

Term, 1919 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 29th day of January 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 F. Luther

STATE OF MARYLAND,

BALTIMORE CITY, SCT :

I hereby certify that on this twenty second day of January 19 20 before me, the subscriber, a Notary Public, of the State of Maryland, in and for the City aforesaid, personally appeared Jesse Graham 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. Jesse Graham

George F. Rehnert
Notary Public.



3/12/12/29

Docket E. 813/1919

IN THE CIRCUIT COURT

Jessie Graham

vs

Frank Graham

DEPOSITIONS

B No. *20340*

157
PLAINTIFF'S COSTS

Examiner.....	\$ 8.00
Copies
Notices
Sheriff
Stenographer	1.50

_____ \$ 9.50 Paid

DEFENDANT'S COSTS

Examiner.....	\$
Copies
Notices
Sheriff
Stenographer

_____ \$

ALFRED J. CARR, Examiner

Filed *9* day of *July* 19*20*

Jessie Graham

vs.

Frank Graham

In the Circuit Court

OF BALTIMORE CITY

A Decree Pro Confesso having passed,

and notice having been given me by the Solicitor for the Plaintiff
of a desire to take testimony in the same, I, ALFRED J. CARR, 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
29th day of January 1920, met on
the 3rd day of February in the year nineteen
hundred and twenty at my office, in the City of Baltimore, in the State
of Maryland, and assigned the 6th day of February
in the same year at one o'clock in the after noon and the
office of the Examiner, 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 deposition, that
is to say:—

JESSIE GRAHAM, the Olaintiff produced as a witness on her own behalf, being duly sworn, deposeth and saith as follows-that is to say-

BY THE EXAMINER:

1 Q- State your name, address, and occupation.

✓ A- Mr name is Jessie Graham, I live 523 S. Green Street and work in a hotel as assistant to the housekeeper.

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

A- I am the Plaintiff, and Frank Graham, the Defendant, is my husband.

BY MR. DAVIS:

3 Q- When, where, and by whom were you married?

A- I was married on December seventeenth 1899 by the Rev. Earnest Lyons a Methodist minister at his residence on Hill Street, city of Baltimore, state of Maryland.

4 Q- Were any children born of this marriage?

A- No, Sir, none.

5 Q- How long have you and your husband been residents of Maryland prior to December 1919?

A- I live in Maryland and have lived here all my life and my husband lived here all his life.

6 Q- Are you and your husband living together now? If not state when you separated and which one left the other.

A- We are not living together, my husband left me June tenth 1910.

Jessie Graham

7 Q- What was your conduct and treatment toward your husband during the whole of your married life?

A- I was a good, true wife and did all I could for him.

8 Q- Why did he leave you June tenth, 1910?

A- He left me because he wanted to go with another woman.

9 Q- What occurred on June tenth, 1910.

A- He beat me and abused me, he cut me on the back of my neck and said he was going to leave and never come back, he got his clothes and left.

10 Q- Do you know the name of that woman.

A- Evelyn Cross.

11 Q- Did he go to live with her?

A- Yes, and he is living with her now in Calvert County and he has three children by her.

12 Q- Has the abandonment of you by your husband continued uninterruptedly for at least three years prior to December third 1919?

A- Yes, over three years. He left me in 1910.

13 Q- Was the abandonment of you by your husband his own deliberate and final act?

A- Yes, it was.

14 Q- In your opinion is there any reasonable hope or expectation of a reconciliation between you?

A- None.

Jessie Graham

15 Q- Since you discovered your husband's adultery, have you lived with or cohabited with him?

A- No, I have not.

16 Q- How do you know they are living in Calvert County, your husband and a woman?

A- I have been to Calvert County and to the home where they live and I saw the woman and children. This was in the summer of 1918.

17 Q- How do they live there?

A- As man and wife, all the people there know them as man and wife.

Question by the Examiner:

Do you know or can you state any other matter or thing that may be of benefit or advantage to the parties of 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.

Answer:

No Jessie Graham

VIOLA SCOTT, a witness produced on behalf of the Plaintiff, being duly sworn, deposeth and saith as follows- that is to say-

BY THE EXAMINER:

1 Q- State your name, address, and occupation.

A- I am Miss Viola Scott, I live 523 S. Green Street and I am a waitress.

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

A- Yes, both all my life, twenty years or over.

BY MR. DAVIS:

3 Q- Are they man and wife and if you say they are, state how you know it?

A- They are man and wife and I have often been to their home and I lived with them for over a year and all the people know them as man and wife.

4 Q- Were any children born of this marriage?

A- No she has no children.

5 Q- Have the parties to this suit been residents of the state of Maryland for more then two years?

A- Yes, Mrs. Graham has lived in Baltimore all her life and he also, only he is now in Calvert County.

6 Q- Are they living together now?

A- No, Sir, they are not. Mr. Graham left Mrs. Graham in 1910.

Viola Scott

7 Q- From your observation as you saw it when you lived there and on visits, how did Mrs. Graham treat her husband?

A- She was a good wife to him in every way.

8 Q- How did he treat his wife?

A- He cursed and abused her.

9 Q- When Mr. Graham left his wife, why did he do so?

A- He left her for a woman named Evelyn Gross.

10 Q- Where does the Defendant live and with whom?

A- In Calvert County below Prince Frederick's called St. Leonards, with Evelyn Gross the woman he left his wife for.

11 Q- How do you know this?

A- I have visited St. Leonards and I have seen Mr. Graham and Evelyn Gross there and the reputation is that they are man and wife.

12 Q- Do you know of any children?

A- Yes, there are three, so I am told, but I have seen two of them.

13 Q- Has Mrs. Graham, to your knowledge, lived with her husband in Calvert County since he left her in 1910?

A- No, Sir, she has not. He has Miss Gross in the home.

14 Q- Has the abandonment of the Plaintiff by the Defendant continued uninterruptedly for over three years?

A- Yes, most ten years.

Viola Scott

15 Q- Was the abandonment his own deliberate and final act?

A- He left Mrs. Graham because he wanted to go to the Gross woman, it was his own deliberate and final act.

16 Q- In your opinion is there any reasonable hope or expectation of a reconciliation between them?

A- No, No hope - never.

Question by the Examiner:

Do you know or can you state any other matter or thing that may be of benefit or advantage to the parties to this suit or either or 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.

Answer:

No Viola Scott

MISS DALRYMPLE BANNISTER a witness produced on behalf of the Plaintiff, being duly sworn, deposes and saith as follows-that is to say-

BY THE EXAMINER:

1 Q- State your name, address, and occupation.

A- Dalrymple Bannister, 635 Pierce Street, Baltimore Maryland. I work at Guth Chocolate Company.

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

A- Yes, both all my life, over thirty years.

BY MR. DAVIS:

3 Q- Are they man and wife and if you say they are, state how you know it?

A- I know they are married. I visited them often while they lived together.

4 Q- Were there any children by this marriage?

A- No, Sir.

5 Q- How did Mrs. Graham treat her husband?

A- Fine. I know she was a good true woman to him.

6 Q- How did he treat her?

A- Very bad. Whenever I was there he was always abusing and quarreling. I have seen bruises on her from his beating her.

7 Q- Are they now living together?

A- No, Sir.

8 Q- When did they separate and which one left the other?

A- He left her in June 1910.

Dairynple Bannister

9 Q- Where did he go when he left his wife?

A- After the time he left his wife they lived in Calvert County near Prince Frederick. He went to live with Miss Gross at St. Leonards and he still lives with her.

10 Q- Have or not to your knowledge, Mr. Graham and Miss Gross had any children?

A- I know they live as man and wife and all the people thing that. I have been told there are three children but I have not seen them.

11 Q- Has the abandonment of the Plaintiff by the Defendant continued uninterruptedly for over three years?

A- Yes, since 1910 when he went to live with Miss Gross.

12 Q- Was the abandonment his own deliberate and final act?

A- Yes, he left her for Miss Gross.

13 Q- In your opinion is there any reasonable hope or expectation of a reconciliation between them?

A- No, Sir, there could be nothing like that.


Question by the Examiner:

Do you know or can you state any other matter or thing that may be of benefit or advantage to 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.

Answer:

No Adversely. Permitted

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 _____ February _____ in the year of our Lord nineteen hundred _____ and twenty _____ at the City of Baltimore in the State of Maryland.

Alfred J. Carr 
Examiner.

There are no _____ Exhibits with these depositions, to wit:
Plaintiff's _____ Exhibit _____

Defendant's _____ Exhibit _____

Alfred J. Carr
Examiner.

I, ALFRED J. CARR, 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 _____.

Alfred J. Carr
Examiner.

813
19 19 13 19 19

Docket No.

Jesse Robau

vs.

Walter Robau

Order of Reference.

Case

B 20 340

(6)

Filed 14 day of July 1920

Jessie Graham

vs.

Frank Graham

IN THE
CIRCUIT COURT

OF
BALTIMORE CITY

J. J. [Signature] Term, 19 *20*

This case being submitted, without argument, it is ordered by the Court, this *12th* day of *February* 19*20*, that the same be and is hereby referred to *Ward B. Cor* Esq.,

Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Robert F. [Signature]

Report of Auditor and Master

Bill for divorce a vinculo matrimonii filed by the wife against her husband on the grounds of abandonment and of adultery. Code 1911, Art. 16, secs. 36-41.

Defendant summoned.

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

The marriage proven.

The abandonment for three years, its finality and the irreconcilability of the parties 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. Cor
Auditor and Master.

Fee \$9 paid.

March 1st, 1920.

4332

CIRCUIT COURT

B-813-

1919.

No. 59 Docket

JESSIE GRAHAM

VS.

FRANK GRAHAM.

Decree of Divorce

B 20340

B No.

(7)

fd 8th April 1920

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

Wm M. Cline

Auditor and Master.

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

JESSIE GRAHAM

VS.

FRANK GRAHAM

Term, 19.20.

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

It is thereupon, this eight day of April, A. D. 1920, by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said - - - - -
Jessie Graham - - - - -
the above named Complainant be and she is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, the said Frank Graham.

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

Robert F. Staunton