

490
B 1923

In the Circuit Court
#2,
Baltimore City.

LUCY NICHOLS HAMER

VS.

REGINALD HAMER.

2218 Dorris Hill Ave

Bill for divorce,
A Vinculo Matrimonii.

Mr. Clerk: --
No 23306B
(1)

Please file &c.

Roy S. Bond
Sol. for Plaintiff.

ROY S. BOND
ATTORNEY AT LAW
215 ST. PAUL PLACE
BALTIMORE, MD.

FILED
4 October 1923

LUCY NICHOLS HAMER

VS.

REGINALD HAMER

In the Circuit Court, #2,

Baltimore City.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix, Lucy Nichols Hamer, complaining, respectfully says:

(1) That she was married to her husband, Reginald W. Hamer, in Baltimore City, State of Maryland, on or about the 24th day of June, 1916, with whom she resided until on or about the 30th day of May, 1919.

(2) That the defendant is a resident of Baltimore City, State of Maryland, and has been for more than two years prior to the filing of this Bill of Complaint.

(3) That though the conduct of your oratrix, Lucy Nichols Hamer, has 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 more; that such abandonment has continued uninterruptedly for more three years, is deliberate and final, and the separation of the parties is beyond any reasonable hope or expectation of a reconciliation.

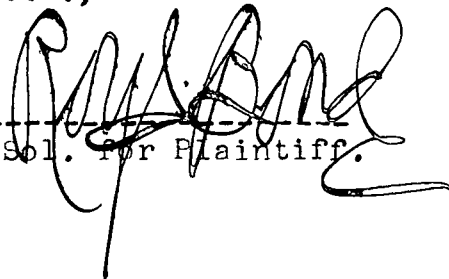
(4) That there are no children as issue of said marriage.

WHEREFORE YOUR ORATRIX PRAYS:

- a- A divorce, A Vinculo Matrimonii, from the defendant, Reginald Hamer,
- b- That she may resume her maiden name, Lucy Nichols,
- c- Such other and further relief as the case may require.

May it please your Honor, to grant unto
your Oratrix, Lucy Nichols Hamer, the writ of subpoena,
directed unto the said defendant, Reginald Hamer, resid-
ing 2218 Druid Hill Avenue, commanding him to be and ap-
pear in this court, in person or by solicitor, on some day
certain to be therein named and perform such decree as may
be passed in the premises.

As in duty bound, etc.,


Sol. for Plaintiff.

EQUITY SUBPOENA
District of Columbia



Pr 19 141-15X
Ct. Ct. No. 2

490
1923 B Docket No. 32

Harner

vs.

Reginald Harner

1631 Penna

Subpoena to Answer Bill of Complaint

Pa. Subpoena Hotel 8 am.

No. 23306B
2-3-4

Copy = copied
5 January 1924
13 March 1923

Filed 8 October, 1923

Ray Bond
Solicitor.

10-#

Now East
(mistake)
Thomas J. McMurtry
Sheriff

13 Dec 1923

REISSUED TO Incumbent Return Day, 1923

John Pleasant
CLERK.

Thomas J. McMurtry
Sheriff

New East
(Inkholder.)

3 January 1924

REISSUED TO January Return Day, 1924

John Pleasant
CLERK.

Summoned and a copy of the Process left with
the defendant

John C. Potee
Sheriff

Fees - 0.80

(Bichy)
1/3/24

EQUITY SUBPOENA
The State of Maryland

To

Reginald Hamer

2278 Druid Hill Ave
1631 Pennsylvania Ave
musician at Royal Palace Hotel

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 October, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Lucy Nichols Hamer

against you exhibited in the CIRCUIT COURT No. 2 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 10 day of September, 1923

Issued the 5 day of October, in the year 1923

John Pleasant
Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

IN THE CIRCUIT COURT NO.2

of

B 620
1923

BALTIMORE CITY.

LUCY NICHOLS HAMER

VS.

REGINALD HAMER

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

J. Steward Davis
ATTORNEY FOR RESPONDENT.

No 23346B
51

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

Jan 7 January 1924
BAUMGARTEN & CO., INC.

LUCY NICHOLS HAMER

:

IN THE CIRCUIT COURT NO. 2

VS.

:

OF

REGINALD HAMER

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the above bill of complaint respectfully says:

1. That he admits the first paragraph of your complainant's bill.
2. That he admits the second paragraph of your complainant's bill.
3. That he denies with great emphasis the third paragraph of your complainant's bill.
4. That he admits the fourth paragraph of your complainant's bill.

WHEREFORE your respondent prays that the bill be dismissed with costs to the complainant.

J. Steward Davis
ATTORNEY FOR DEFENDANT.

Circuit Court No. 2

490

192 3.

Docket 32B.

LUCY NICHOLS HAMER

vs.

REGINALD HAMER.

Sapt

Petition for leave to take
Testimony and Order of
Court thereon.

No. *23306 B*
6

Filed *9 February*, 192 *X*

LUCY NICHOLS HAMER

vs.

REGINALD HAMER.

IN THE

Circuit Court No. 2,


OF

BALTIMORE CITY.

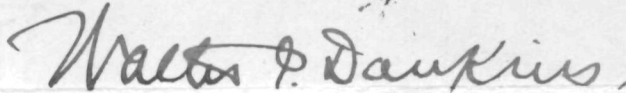
To the Honorable the Judge of the
Circuit Court No. 2 of Baltimore City:

THE PETITION OF Lucy Nichols Hamer, plaintiff,

in this case, respectfully shows that she desire to take testimony in this case, and respectfully pray that leave be granted her to do so before one of the Standing Examiners of this Court.


Solicitor for Plaintiff.

ORDERED, this 9th day of February 1924, that leave be granted to the parties to the cause, to take testimony, as prayed, before any one of the Standing Examiners of this Court.



Doc. Q $\frac{490}{1923}$

In the Circuit Court, No. 2,
OF BALTIMORE CITY

DEPOSITIONS

Lucy Nichols Hamer

vs.

Reginald Hamer

No. 23306B

PLAINTIFF'S COSTS

Examiners..... \$ 8⁰⁰
Copies
Sheriff.....
Stenographer
\$ _____
=

DEFENDANT'S COSTS

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

Ed 22 May 1924

3 June 1924

31191126

Lucy Nichols Hamer

vs.

Reginald Hamer

In the Circuit Court *No. 2*

OF BALTIMORE CITY.

The above cause being at issue

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

ninth day of *February* 19*24*, met on

the *ninth* day of *February* in the year nineteen

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

of Maryland, and assigned the *ninth* day of *February*

in the same year at *three* o'clock in the *after-*noon and the

office of *Ray S. Bond, Esq.* 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:—

83

Homer,

v.

Homer.

Testimony taken at the office of Roy S. Bond, Esq., Baltimore, Maryland, May 1924, at three O'clock P. M.

Lucy N. Homer, the Plaintiff in this case, produced on her own behalf, having been first duly sworn, deposeseth and saith as fellows, that is to say:

By the Examiner:

1 Q. State your name residence and occupation?

A. Lucy N. Homer, 515 Robert Street; waitress.

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

A. I am the Plaintiff and my husband is the Defendant.

By Mr. Bond:

1 Q. When, where and by whom were you married?

A. I was married by the Reverend Mr. George Bragg.

2 Q. Where?

A. In Baltimore City, Maryland:

3 Q. Was the Reverend Mr. Bragg a Regular Minister of the Gospel?

A. Yes.

4 Q. Connected with what Faith?

A. Episcopal.

Lucy N. Homer.

5 Q. When were you married?

A. I was married June 24th., 1916.

6 Q. Are you living with your husband now?

A. No sir.

7 Q. Did he leave you or did you leave him?

A. He left me.

8 Q. When did he leave you?

A. He left me Declaration Day 1919.

9 Q. 30th., May.

A. Yes.

10 Q. How did he treat you while living together as husband and wife?

A. He never stayed home very much; he was out all the time; he was addicted to drink, and, of course when he came home, he always started arguments.

11 Q. What did he do on the 30th., May 1919?

A. He came in and started an argument, and said that he did not want a wife any how, and packed his trunk and left, and he sold the house that we were living in before he left.

12 Q. What did he leave when he left you; what did he leave behind for you?

A. He did not leave anything for me.

13 Q. Did he give you any money?

A. No sir.

L. N. H.

14 Q. Has he supported you since?

A. No sir.

15 Q. Has he given you a ten cent piece since the 30th., May 1919?

A. No sir.

16 Q. Then you have been self-supporting since that time?

A. Yes; I have been self-supporting since that time.

17 Q. Have you and your husband been residents of Baltimore since City, State of Maryland, for more than two years prior to the filing of this suit?

A. Yes.

19 Q. How did you treat your husband?

A. I treated him the best that I knew how.

20 Q. Were you always a kind, affectionate and true wife towards your husband?

A. Yes.

21 Q. Did you give him any cause or reason for abandoning and deserting you?

A. No sir; not any.

22 Q. Has he declared his intention not to live with you any more?

A. No sir; I have not seen him.

L. N. H.

23 Q. I mean by his acts?

A. He has never said anything about coming back.

24 Q. He has never said anything about coming back, and he has not come back, and he has shown that he will not come back?

A. Yes.

25 Q. Has his abandonment of you continued uninterruptedly for more than three years prior to the filing of this suit?

A. Yes.

26 Q. Was his going his own deliberate and final act?

A. Yes.

27 Q. Is there any hope or expectation of a reconciliation, or of you living with him any more?

A. No sir.

28 Q. Are there any children as the result of this marriage?

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.-----

Yes
Lucy Hamer.

Mamie Allen, a witness of lawful age, produced on behalf of the Plaintiff, having been first duly sworn, deposeseth and saith as follows, that isto say:

By the Examiner:

1 Q. State your name residence and occupation?

A. Mamie Allen, 515 Robert Street; maid.

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

A. Yes.

By Mr. Bond:

1 Q. Were you at the wedding of the parties to this suit?

A. Yes.

2 Q. When, where and by whom were they married?

A. June 24th., 1916 by the Reverend Mr. Bragg.

3 Q. In Ellicott City.

A. Baltimore, Maryland.

4 Q. Is she living with her husband now?

A. No sir.

5 Q. How did they happen to separate?

A. He sold the house and left.

6 Q. Did she continue to live there after he sold the house?

A. No.

7 Q. She lived there a week or so, didn't she?

A. Yes; for three or four days.

8 Q. But he sold the house.

M. A.

A. Yes.

9 Q. It was in his name, was it?

A. Yes, and he left.

10 Q. Has he supported her since that time?

A. No sir.

11 Q. When did he leave her?

A. May 30th., 1919.

12 Q. Has he ever been back to her since?

A. No sir.

12 Q. Has he been a resident of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit?

A. Yes.

13 Q. How did she treat her husband?

A. She was very affectionate, and very true, as far as I know.

14 Q. Will you state whether or not she was a kind and true wife towards her husband?

A. Yes; she was.

15 Q. Did she give him any reason at all for abandoning and deserting her?

A. No sir.

16 Q. Has he shown by his acts that he does not intend to live with her any more.

A. Yes.

M. A.

17 Q. Has his abandonment of his wife continued uninterruptedly for more than three years prior to the filing of this suit?

A. Yes.

18 Q. Was his going his own deliberate and final act?

A. Yes.

19 Q. Is there any hope or expectation of a reconciliation?

A. No sir.

20 Q. Are there any children as the result of this marriage?

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.---

Wm. Allen

Maud Male, a witness of lawful age, produced on behalf of the Plaintiff, having been firstbduy sworn, deposed and saith as follows, that is to say:

By the Examiner:

1 Q. State your name residence and occupation?

A Maud Male, 515 Robert Street; maid.

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

A. Yes.

By Mr. Bond:

1 Q. Do you remember when they were married?

A. Yes.

2 Q. When?

A. June 24th., 1916.

3 Q. Do you remember when they lived together as husband and wife?

A. Yes.

4 Q. And known as such?

A. Yes.

5 Q. Are they living together now?

A. No sir.

6 Q. How did he treat her?

A. He did not treat her as a husband should treat her.

7 Q. When he left his wife May 30th., 1919, did he leave his wife anything?

A. Nothing that I could see.

Maud Male.

8 Q. Has he provided for her since?

A. No sir.

9 Q. Has he been a resident of Baltimore City, State of Maryland, for more than two years prior to the filing of this suit?

A. Yes.

10 Q. How did he treat his wife, - how did she treat him?

A. She was a very good wife to him.

11 Q. Has she always been a kind, affectionate and true wife towards her husband?

A. I think she has.

12 Q. Has he shown by his acts that he does not intend to come back to her any more

A. Yes.

13 Q. Has his abandonment of his wife continued uninterruptedly for more than three years prior to the filing of this suit?

A. Yes.

14 Q. Was his going his own deliberate and final act?

A. Yes.

15 Q. Is there any hope or expectation of their living together any more?

A. No sir.

Maud Male.

16 Q. You dont think so.

A. No sir.

17 Q. Are there any children as the result of this marriage?

A. No sir, no children.

18 Q. Who has been supporting her ever since he left her?

A. She has been supporting herself.

19 Q. Self-supporting?

A. Yes.

20 Q. Working hard?

A. Yes indeed.

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. ---

Maude Male

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.....*22nd*.....day of.....*May*.....in the year of Our Lord nineteen hundred and.....*twenty-four*.....at the City of Baltimore, in the State of Maryland

A. de Russy Sappington..... (SEAL).
Examiner.

There are.....*one*.....Exhibits with these depositions, to wit:

Plaintiff's..... Exhibit.....*/*.....

Defendant's..... Exhibit.....*/*.....

A. de Russy 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 Russy Sappington
Examiner.

Ct. Ct. No. 2

490
1923

32
Docket No. B

Kauer

vs.

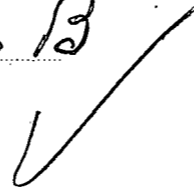
Kauer

**Order of Reference
and Report**

Robt

No. 23306 B

8-9



Order Filed 5 day of June 1924

Report Filed 10 day of June 1924

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

Lucy Nichols Bauer
vs.

Reginald Bauer

May Term, 192*X*

This case being submitted, without argument, it is ordered by the Court, this *5*
day of *June*, 192*X*, that the same be and is hereby referred to
Alexander H. Robertson, Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.

Mattie J. Roberts

Report of Auditor and Master

Bill filed by wife against husband for divorce a vinculo matrimonii on the ground
of abandonment for three years, Code Article 16, Section 36. Defendant summoned and
answered. Proof shows marriage, residence and abandonment of the Plaintiff for at least
three years continuous, deliberate, final and without hope of reconciliation. Case
submitted and ready for decree.

Alex H. Robertson

Auditor and Master.

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

Alex. Robertson
Auditor and Master.

Circuit Court No. 2

B

H90

1924

B

No. *32* Docket

LUCY NICHOLS HAMER,

vs.

REGINALD HAMER,

DECREE OF DIVORCE

P₄
P

R

No. *23306 B*

10

Copy Copied

Filed *12 June*, 192*X*

DECREE OF DIVORCE.

LUCY NICHOLS HAMER,

vs.

REGINALD HAMER.

IN THE,

Circuit Court No. 2

OF

BALTIMORE CITY.

MAY

TERM, 1924.

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

It is thereupon, this 12th day of JUNE, Anno Domini, one thousand nine hundred and twenty-four by the Circuit Court No. 2 of BALTIMORE CITY, Adjudged, Ordered and Decreed, that the said

LUCY NICHOLS HAMER,

the above named complainant be, and she is hereby DIVORCED A VINCULO MATRIMONII, from the defendant, REGINALD HAMER.

And the Plaintiff is hereby permitted to resume her maiden name, Lucy Nichols.

And it is further Ordered, that the said Defendant, pay the cost of this proceeding.

Walter J. Dawkins.

I, JOHN PLEASANTS, Clerk of the Circuit Court No. 2 of Baltimore City, do hereby certify that the above is a true copy of the decree taken from the record of proceedings in said cause.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of the said Court, this day of 192