

IN THE CIRCUIT COURT  
NO. 2  
BALTIMORE CITY.

*B394*

*1921*

Charles Hargraves

vs.

Ellen Hargraves.

*312 College al.*

Bill for divorce,  
A VINCULO MATRIMONII.

Mr. Clerk:--

Please file &c.,

*Roy S. Bond*

Sol. for Complainant.

*No 20771 B*

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

FILED

*6 September 1921*

CHARLES HARGRAVES

VS.

ELLEN HARGRAVES

In the Circuit Court

-No. 2-

Baltimore City.

-----  
TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully says:

-FIRST-

That the parties hereto were in Baltimore City, State of Maryland, on or about the 15th day of December 1919, and lived together as man and wife until on or about the 7th day of August 1921.

-SECOND-

That both parties are residents of Baltimore City, State of Maryland, and have been for more than two years prior to the filing of this Bill of Complaint.

-THIRD-

That the defendant has on divers days and times since the said marriage, committed the crime of adultery in Baltimore City, with divers lewd men, whose names will be disclosed on the day of trial, and that the said acts were committed without his procurement, connivance, or consent and that he has not lived nor cohabited with the said defendant since he discovered the same.

-FOURTH-

That the conduct of your Orator during and since the said marriage, has been above reproach in all respects, having always been a kind and affectionate husband to the said defendant.

-FIFTH-

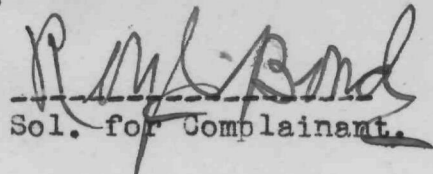
That there is one child as issue of said marriage, Charles Hargraves Jr., aged one year.

WHEREFORE YOUR ORATOR PRAYS:

- a- A divorce, A Vinculo Matrimonii,  
from the defendant.
- b- The care and custody of the minor  
child.
- c- Such other and further relief as the  
case may require.

May it please your Honor, to grant unto your Orator, the writ of subpoena, directed unto the said defendant, commanding her to be and appear 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 Complainant.

520

Ct. Ct. No. 2

394  
192 B Docket No. 30

Hargraves

vs.

Hargraves

Subpoena to Answer Bill of Complaint

Per

No. 20771  
(2)

Copy "Copied"

Filed 13 Sept, 1921  
Ray S Bond  
Solicitor.

14 d Post

9

Summoned and a copy of the Process left  
with the defendant.

Thomas F. M. Wulfe  
Sheriff

L. De \$0.80

(Ring) 9/21

EQUITY SUBPOENA  
The State of Maryland

To

*AP 9/7/21 (over)*  
*Ellen Hargraves*  
*312 College Alley*

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

*Charles Hargraves*

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *11* day of *July*, 192 *1*

Issued the *6* day of *September*, in the year 192 *1*

*John Phasants*  
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 394  
Baltimore Md

Charles Hargrave

vs  
Ellen Hargrave

Prima facie proof of divorce

Mr Clerk please file  
(Ed. M. Gray)

No 26771 B  
(3)

DAVIS & BISHOP  
ATTORNEYS AT LAW  
BANNEKER BUILDING  
14 E. PLEASANT STREET  
BALTIMORE, MD.

3d 10 Sept 1927

CHARLES HARGRAVES

IN THE CIRCUIT COURT

VS.

OF

ELLEN HARGRAVES

BALTIMORE CITY.

---

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully says:-

FIRST, THE answer of your respondent to the petition of the complainant exhibited in the above case is as follows:-

FIRST, Your respondent admits the allegation as contained in the first paragraph of the plaintiff bill of complaint.

SECOND, Your respondent admits the allegations as contained in the second paragraph of the plaintiff bill of complaint.

THIRD, Your respondent denies emphatically the third paragraph of the plaintiff bill of complaint.

FOURTH, Your respondent denies the allegations as contained in the fourth paragraph of the plaintiff bill of complaint.

FIFTH, Your respondent admits the allegations as contained in the fifth paragraph of the plaintiff bill of complaint.

SIXTH, The respondent is without means to defray the expense of this litigation having been left destitute by the petitioner Charles Hargrave and that the respondent is depending upon her relatives for the support of herself and the infant child Charles Hargrave Jr. The petitioner is capable of earning thirty five dollars a week; that the petitioner is advised by counsel that she is entitled to have an order passed by this Honorable Court awarding her a sum certain as alimony during the progress of this suit and a further sum to compensate her solicitor for his services therein.

WHEREFORE YOUR RESPONDENT PRAYS:-

a-a Allowing her alimony Pendente Lite for herself and infant child and a counsel fee in such sum as this Court may think just and proper.

Ellen Hargraves  
COMPLAINANT

C. Fred Now  
SOLICITOR FOR COMPLAINANT.

State of Maryland )  
Baltimore City ) To Wit:

I hereby certify that on this 9th. day of September 1921, before me the subscriber a Notary Public in and for Baltimore City, State of Maryland, personally appeared Ellen Hargraves, 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.

Caroline Murray  
NOTARY PUBLIC.





Serve on  
Charles Hangrauer  
1027 N. Carey St.

B Docket 394  
1921

**CIRCUIT COURT No. 2**

Hangrauer

vs.

Hangrauer

**Order Counsel Fee and Alimony.**

Pendente Lite

Husband Plaintiff

ORDER

13 Sept 1921

No. 20771 B.

(4)

Copy "deposited"

Filed

13 Sept 1921

114

Copy of the within Order of Court, served on  
Charles Hangrauer, on the 15th day of September,  
1921, in the presence of George P. Whornton,  
Thomas F. McSully,  
Sheriff.  
Fees \$0.50.

Charles Hargraves

vs.

Ellen Hargraves

IN THE

CIRCUIT COURT No 2

OF

BALTIMORE CITY

September TERM, 1921

ORDERED BY THE COURT, this 13 day of September 1921

that the Plaintiff Charles Hargraves

pay to the Defendant Ellen Hargraves

the sum of twenty Dollars as Counsel Fee for the

Solicitor of the Defendant, and that he further pay the sum of Eight

Dollars per week, during the continuance of this suit, to the said Defendant Ellen

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 29

day of September 1921, provided a copy of this Order be served on the said Plaintiff

Charles Hargraves on or before the 19

day of September 1921

H. Arthur Stump

Capable of earning \$35.00 per week  
1 child

TRUE COPY—TEST:

Clerk.

13 394/1921

In the Circuit Court

No. 2  
Baltimore City.

CHARLES HARGRAVES

VS.

ELLEN HARGRAVES.

Answer to Petition for  
Alimony and Counsel fee.

Mr. Clerk:--

Please file &c.,

*Roy S. Bond*  
Sbl. for Complainant.

No 20771 B

4/2

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

FILED

20 September 1921

CHARLES HARGRAVES

VS.

ELLEN HARGRAVES

IN THE CIRCUIT COURT

NO. 2

BALTIMORE CITY.

-----  
TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Complainant in answer to the Petition for Alimony and Counsel fee filed against him respectfully says:

-FIRST-

He denies that he is capable of earning Thirty Five (\$35) dollars per week and to the contrary says that he is without work and has been for considerable time. That his only means of living has been from Three to Five (\$5) dollard per week which he has been able to earn as a Shop-Boy in a barber-shop on Pennsylvania Avenue. He further asserts that he is desirous of supporting his minor child, Charles Hargraves Jr., but at the present time he is unable to pay alimony pendente lite or Counsel fee, despite his eagerness to comply with the order of this Honorable Court.

Having answered the Petition for alimony in so far as he is advised is necessary, he respectfully prays that the defendant's Petition be dismissed and the order thereon vacated.

As in duty bound, etc.,

-----  
Sol. for Complainant.

*Charles Hargraves*

-----  
Plaintiff.

*Raymond B. ...*  
-----  
Sol. for Petitioner.

State of Maryland  
Baltimore City - to wit-

I hereby certify that on this <sup>16<sup>th</sup></sup> day of  
September 1921, before me the subscriber, a Notary  
Public, of the State of Maryland, in and for Balti-  
more City, personally appeared *Charles Hargraves*,  
the Plaintiff, in the foregoing proceedings and  
made oath in due form of law, that the matter contain-  
ed in the foregoing petition is true to the best of  
his knowledge and belief.

As witness my hand and Notarial Seal.

*Eleanora D. Wright*  
-----  
- NOTARY PUBLIC -

Ray S. Bond

MS9

Cir. Ct. No. 2

394

1921

Docket No. 30

Charles Hargrave

vs.

Ellen Hargrave

MOTION FOR HEARING

No. 771 B

Filed, 20 Dec 1921

Edward Davis

~~Charles Hargrave~~  
~~Ellen Hargrave~~

vs.

~~Charles Hargrave~~  
~~Ellen Hargrave~~

IN THE  
**Circuit Court No. 2**  
OF  
BALTIMORE CITY

The defendant

by J. Stewart Davis

Solicitor, applies to have the above entitled cause placed in the

Trial Calender for hearing on alimony + counsel fee

In conformity with the First Equity Rule.

J. Stewart Davis

Solicitor for defendant

Serve on

Roy S. Bond  
Solvent

709

Cir. Ct. No. 2

394  
1921

P

Docket No. 3

Hargraves  
vs.

Hargraves

NOTICE AS TO HEARING

No. 20771B

6

Copy "looped"

Filed 20<sup>th</sup> System, 1921

Copy of the within notice served on Roy S Bond Solicitor  
on the 21<sup>st</sup> day of September 1921 in presence  
of Harry B Frank Thomas J M Maulty  
Fees \$ 0.50 Sheriff



*Charles Hargraves*

vs.

*Ellen Hargraves*

IN THE  
**CIRCUIT COURT, No. 2**  
OF  
BALTIMORE CITY.

Upon application made by the Solicitor for the

*Defendant*

the above entitled cause has been placed upon the Trial Calendar in accordance with the provisions of the First Equity Rule, and the same will stand for hearing on

*Monday and*

*Counsel fee*

when reached in due course on the said calendar.

JOHN PLEASANTS,

Clerk Circuit Court No. 2.

Serve on

*J Steward Davis*  
*Solicitor*

*20106*  
Circuit Court No. 2 *37*

*394*  
191 *21*

Docket No. *30B.*

CHARLES HARGRAVES

vs.

ELLEN HARGRAVES.

PETITION AND ORDER TO TAKE  
TESTIMONY UNDER 30TH RULE.

No. *20771B*

*Copy // copied*

Filed *15 October* 19*21*

*Copy of the within Petition and Order of Court and  
on J Steward Davis Solicitor on the 15th day  
of October 1921 in presence of Harry B Framy  
Thomas J M Mully  
Shirley*

*Fees \$ 0.50*

CHARLES HARGRAVES

vs.

ELLEN HARGRAVES.

IN THE  
Circuit Court No. 2  
OF  
BALTIMORE CITY.

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

The Plaintiff in this case respectfully shows unto your Honor

That he desires to examine orally, in open Court and in the presence of your Honor, certain witnesses who can testify to the facts and matters relevant to the allegations in the Bill of Complaint filed in this case.

Your Petitioner therefore prays your Honor to pass an order, according to the Statutes for such cases made and provided

And as in duty bound will ever pray.

*Roy Bond*  
Solicitor for Plaintiff.

Upon the foregoing Petition and Application it is this 15<sup>th</sup> day of October,  
A. D. 1921, Ordered that the Petitioner have leave to take testimony as prayed and that the testi-  
mony to be offered be taken as required by the 30<sup>th</sup> Rule of this Court. And it is further Ordered that  
a copy of this Petition and Order be served on the Defendant  
or his Solicitor, on or before the 20<sup>th</sup> day of October, 1921

*H. Arthur Stump*

Ray L. Bond

No 23

✓ 9

Cir. Ct. No. 2

394

B

192

Docket No. 30

Charles Hargrave

vs.

Ellen Hargrave

Hargrave

**MOTION FOR HEARING**

No. 70771 B  
8

Filed, 15 October 1921

Steward Davis

Charles Horgan

vs.

Ellen Horgan

IN THE  
Circuit Court No. 2  
OF  
BALTIMORE CITY

The defendant

by J. Stewart Davis

Solicitor, applies to have the above entitled cause placed in the

Trial Calender for hearing on alimony pendente lite

In conformity with the First Equity Rule.

J. Stewart Davis

Solicitor for defendant

Serve on

Roy S. Bond  
Solicitor

394  
1921

Cir. Ct. No. 2

Docket No. 30

Keargraves  
vs.

Keargraves

NOTICE AS TO HEARING

No. 20771 B.

9

Copy - kept

Filed 15 October, 1921

7/023

Copy of the within notice served on Roy S. Bond, Solicitor  
on the 17th day of October 1921 in presence of Harry C. Frang  
Thomas J. McQuilty  
Shuff

Fees \$ 0.50

*Charles Kargraves*

vs.

*Ellen Kargraves*

IN THE  
**CIRCUIT COURT, No. 2**  
OF  
BALTIMORE CITY.

Upon application made by the Solicitor for the *Defendant*

the above entitled cause has been placed upon the Trial Calendar in accordance with the provisions of the First Equity Rule, and the same will stand for hearing on *Monday September 1st*

*1st*

when reached in due course on the said calendar.

JOHN PLEASANTS,

Clerk Circuit Court No. 2.

Ct. Ct. No. 2 30 B. <sup>394</sup>/<sub>1961</sub>

Charles Hengraues

vs.

Ellen Hengraues

Final Order, Counsel Fee and Alimony

*Pendente Lite,*

No. 20772 B.  
10

Filed 21<sup>st</sup> October 1961



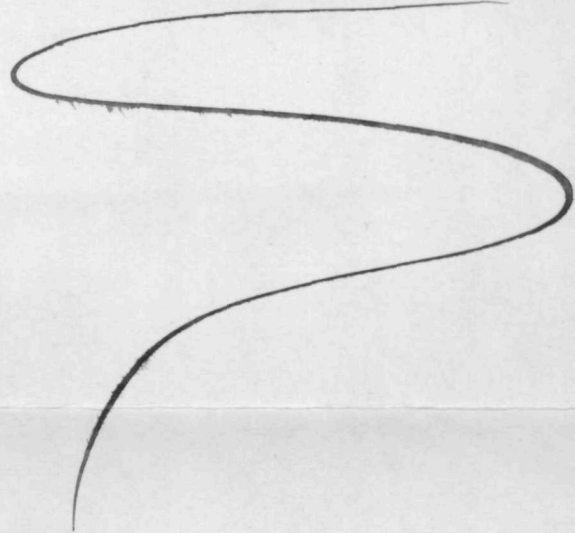
Charles Hargrave  
vs.  
Ellen Hargrave

IN THE  
**CIRCUIT COURT No. 2**  
OF  
BALTIMORE CITY.

The petition for Alimony pendente lite and Counsel fee and the answer thereto in the above entitled cause coming on for final hearing and the respective parties having been heard;

It is Ordered by the Circuit Court No. 2 of Baltimore City this 21st day of October 1921, that the defendant pay to the Ellen Hargrave the sum of \_\_\_\_\_ Dollars, as Counsel Fee for the Solicitor of the \_\_\_\_\_ and that he further pay the sum of Three Dollars per week, during the continuance of this suit, to the said plaintiff as Alimony pendente lite accounting from the 22nd day of October 1921

H. Arthur Stump



SERVE ON

Charles Hargraves

CT. CT. No. 2.

30 B. 394  
1921

Charles Hargraves

vs.

Eileen Hargraves

ORDER OF COURT NISI  
For Contempt

Order: 19. Decem 1921

No. 20771 B.

Copy 1 signed

Filed 19<sup>th</sup> Decem 1921

Copy of the within order of Court served on  
Charles Hargrave on the 19<sup>th</sup> day of December  
1921 in the presence of Edmund J. Fusley  
Thomas F. McNeulty  
Sheriff

Fee \$0.50

*Charles Herzgraves*

vs.

*Ellen Herzgraves*

IN THE  
**Circuit Court No. 2**

OF

**BALTIMORE CITY.**

Ordered by the Circuit Court No. 2 of Baltimore City this 19<sup>th</sup> day of December, 1921  
that the ~~defendant~~ plaintiff appear before this Court in person,  
on the 23<sup>rd</sup> day of ~~October~~ December, 1921, at 10 o'clock A. M., and then and there show  
cause, if any he may have, why he should not be punished for contempt of this Honorable Court  
in not obeying the Order of this Court passed on the 22 day of October, 1921,  
directing the payment of Alimony, pendente lite, by him to the ~~defendant~~ plaintiff; provided, a  
copy of this Order be served on the said Plaintiff on or before the 23<sup>rd</sup> day  
of December, 1921.

Judge.

*H. Arthur Stump*

True Copy: Test

.....  
Clerk.

Circuit Court No. 2

394

1921

B

Docket

31

CHARLES HARGRAVES

vs.

ELLEN HARGRAVES.

Says

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

No.

20771 B

12

Filed

20 Dec 1921

1921

CHARLES HARGRAVES

IN THE

Circuit Court No. 2,

vs.

ELLEN HARGRAVES.

OF

BALTIMORE CITY.

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

THE PETITION OF Charles Hargraves,

Plaintiff,

in this case, respectfully shows that he desire s to take testimony in this case, and respectfully pray s that leave be granted him to do so before one of the Standing Examiners of this Court., and that the Order of Court of 1921, to take testi-  
mony under 30th. Equity Rule be rescinded.

*Roy R Bond*  
Solicitor for Plaintiff.

ORDERED, this 20th day of December 1921., 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., and that the Order of October 15th 1921, to take testimony under the 30th. Equity Rule be and the same is hereby rescinded.

*H. Arthur Stump*

I consent to the passage of the foregoing Order.

*[Signature]*

SERVE ON

Charles Hargraves  
1027 N. Carey St.

CT. CT. No. 2.

30 B. 394  
1921

Charles Hargraves

vs.

Ellen Hargraves

1027 N. Carey St.

ORDER OF COURT NISI  
For Contempt

Order: 9 January 1922

No. 20771 B.  
13

Copy - sealed

Filed 9 January, 1922

14

Wm. E. H. McAvity  
Shuff.  
(Shouten)

Ed 21

Charles Hargraves  
1027 M. Carey St.

vs.

Ellen Hargraves

IN THE  
Circuit Court No. 2

OF

BALTIMORE CITY.

Ordered by the Circuit Court No. 2 of Baltimore City this 9th day of January, 1922  
that the Paullett appear before this Court in person,  
on the 13th day of January, 1922, at 10 o'clock A. M., and then and there show  
cause, if any he may have, why he should not be punished for contempt of this Honorable Court  
in not obeying the Order of this Court passed on the 21 day of October, 1921,  
directing the payment of Alimony, pendente lite, by him to the defendant; provided, a  
copy of this Order be served on the said Paullett on or before the 12th day  
of January, 1922.

Charles F. Stone  
Judge.

True Copy: Test

.....  
Clerk.

SERVE ON

CT. CT. No. 2.

B. 394  
1921

*Hargraves*

vs.

*Hargraves*

**ORDER OF COURT NISI  
For Contempt**

Order:

*Copy*

No. .... B.

Filed....., 19



.....  
Charles Hargaves  
vs.  
Ellen Hargaves  
.....  
.....

IN THE  
**Circuit Court No. 2**  
OF  
**BALTIMORE CITY.**

Ordered by the Circuit Court No. 2 of Baltimore City this 9- day of January, 1922  
that the plaintiff appear before this Court in person,  
on the 13- day of January, 1922, at 10 o'clock A. M., and then and there show  
cause, if any he may have, why he should not be punished for contempt of this Honorable Court  
in not obeying the Order of this Court passed on the 21- day of October, 1921,  
directing the payment of Alimony, pendente lite, by him to the defendant; provided, a  
copy of this Order be served on the said plaintiff on or before the 12- day  
of January, 1922.

Charles F. Stein  
Judge.

True Copy: Test  
John H. Henshaw  
Clerk.

3/18/40

*Dep* 30/8/39  
Doc. .... 1927

In the Circuit Court,  
OF BALTIMORE CITY

DEPOSITIONS

*Hargrave*

vs.

*Hargrave*

No. *20771-a*

PLAINTIFF'S COSTS

Examiners .....	\$ .....
Copies .....	.....
Sheriff .....	.....
Stenographer .....	.....
	\$ <u>          </u>

DEFENDANT'S COSTS

Examiners .....	\$ .....
Copies .....	.....
Sheriff .....	.....
Stenographer .....	.....
	\$ <u>          </u>

*file with  
patrol 40*

Hargrave,

v.

Hargrave.

Testimony taken at the office of Roy S. Bond, Esq., 215 Courtland Street, Baltimore, Maryland, March 2nd., 1922, at 3 .30 O'clock P. M.

CHARLES HARGRAVE, the Plaintiff in this case, produced on his own behalf, having been first duly sworn, deposeth and saith as follows, that is to say:

BY THE EXAMINER:

1 Q. State your name residence and occupation?

A. Charles Hargrave, 1368 North Carey Street; porter.

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

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

BY MR. BOND:

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

A. I was married by the Reverend Mr. Allen.

2 Q. When?

A. On the 15th., of December 1919.

3 Q. Was the Reverend Mr. Allen a Regularly ordained Minister of the Gospel?

A. He was.

## Charles Hargrave.

4 Q. Connected with what Faith and Preaching at what Church?

A. It is a Baptist Church, and I can not recall the name?

5 Q. Shiloh, is'nt it.

A. Shiloh,- th~~a~~ is it.

6 Q. In what City and what State were you married?

A. Baltimore, Maryland.

7 Q. Are you living with your wife now?

A. No sir.

8 Q. Did you leave her or did she leave you?

A. I left her.

9 Q. When ?

A. 7th., of August.

10 Q. What year?

A. 1921.

11 Q. Now, why did you leave your wife?

A. Because of her unfaithfulness.

11 Q. Did you try ,- Did you or not find it out about that time?

A. I did.

12 Q. Now, are you and your wife both residents of Baltimore City, State of Maryland?

A. Yes; we are.

## Charles Hargrave

13 Q. And have you been residents of Baltimore City, State of Maryland, for more than two years prior to the time this divorce was started?

A. Yes; we have.

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

A. I was.

15 Q. Has your conduct been above reproach in all respects both before and since the separation?

A. Yes; it has.

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

A. One child.

17 Q. What is the child's name?

A. Charles, Junior.

18 Q. How old?

A. O, let me see: It is nearly two years old.

19 Q. Now, Mr. Hargrave, you have alleged in your Bill that your wife committed the crime of adultery; do you know what I mean when I say that?

A. Yes.

20 Q. She has been unfaithful to you?

A. Yes.

Charles Hargrave.

21 Q. I want you to tell the Court just in what way she was unfaithful and what you know about it?

A Well, I first suspected her Christmas,- this past Christmas 1920,- Christmas 1920.

22 Q. That is what some one told you.

A. Yes; I was given a pass by the B. and O. Railroad Company to go home, and she refused to go, and the baby was three months old, and she said that it was too young for the baby to travel.

23 Q. And you suspected her for not going?

A. Yes; I suspected her for not going, and when I got on the train, I saw a lot of babies,- babies that were even younger than mine, and I wondered why she did not go.

24 Q. And did you receive certain information about the time you left your wife?

A. I did.

25 Q. Did you live or cohabit with her after you found this information to be true?

A. I did not.

26 Q. Tell us what you found out, and what you saw yourself?

A Well, during the second week in July---

Charles Hargrave.

COUNSEL INTERRUPTING: Now, Mr. Hargrave, I just want to know about the adultery as you related it to me this afternoon.

WITNESS: You mean about Mr. Ridrigs.

COUNSEL: Yes.

A. I went to Mr. Antoni Ridrigs house---

COUNSEL INTERRUPTING: Where was he living.

WITNESS: 310 College Avenue - College Alley.

27 Q. And where did your wife live?

A. 312 College Alley.

28 Q. And this Mr. Ridrigs lived next door to your wife?

A. Yes.

29 Q. Why did you go to the house?

A. I went there because I was suspicious of my wife of this man Burr; I went there to receive information from Mr. Ridrigs as to whether it was so or not. Wait a minute, I think I am giving my testimony wrong; what was the question you asked me.

Note: Question repeated.

WITNESS: Then I have given it exactly right. I went there .

30 Q. You have summoned the witnesses that were with you?

Charles Hargrave.

A. Yes. I knew that my wife lived next door with this man Burr.

31 Q. At what number?

A. My wife lived at 312.

32 Q. On what street?

A. College Alley.

33 Q. What date was this?

A. On the 1st., day of September.

34 Q. What year?

A. 1921.

35 Q. Tell us what you saw and what took place there.

A. I entered the house next door about fifteen minutes of nine O'clock, and was told that my wife and Burr---

COUNSEL INTERRUPTING: You must not tell what somebody else told you; just tell what you saw.

WITNESS: Well, I saw my wife and Burr return to the house and some home about fifteen minutes of eleven, and at about half past twelve I went out into the back yard of the house that I was in next door to them with the intention of climbing to the top of a toilet, which would permit us to see into the room occupied



Charles Hargrave.

by my wife and this man Burr, but I found that it was not necessary as the window was open and you could plainly see in there , and you could see them as they moved about the room, and they were undressing and getting ready to go to bed,- later, they put the light out.

36 Q. Before they put the light out, what did your wife have on and what did this man have on.

A. We saw them take their clothes off,- you could see them plainly from time to time as they moved about the room, and saw them undressing as they got in bed.

37 Q. Did they put the light out before they went to bed?

A. They did. After they had put the light out, we went to the second floor of Mr. Ridrighs house next door, and we could hear my wife and Burr talking in this back room next door; the bed was right near the window, and we could hear them talking from the back window; it was almost a twin window, and you could hear the baby crying in the room.

38 Q. Now, what else did you do, or are you sure there was no one in the room but those two people.

A No; there was no one in the room except those

## Charles Hargraves.

two.

39 Q. You are sure of that.

A. Yes; I am sure of that; I saw them close the door.

40 Q. What room was it?

A. The second floor back room.

41 Q. I mean was it a bed room or parlor or what.

A. Bed room.

42 Q. Is this the house where your wife lived with this man Burr?

A. Yes.

43 Q. Did they live and cohabit together there as husband and wife?

A. Yes; they did.

44 Q. For how long a period of time,- How long did he stay there with her,- Or, do your witnesses know more about that than you do.

A. MY witnesses know more about that than I do.

45 Q. Have you lived or cohabited with your wife since you discovered that she had committed adultery with this man?

A. I have not.

46 Q. And you ask for the care and custody of this minor child in this case; if you are granted the same will

Charles Hargrave.

you do a father's part by the child.

A. Yes; I will.

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.---

*Chas. H. H. H. H. H.*

ANTONIE RIDRIGS, 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. Antonie Ridrigs, 310 College Alley; seaman; I do laboring work too.

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

A. Yes.

BY MR. BOND:

1 Q. Mr. Hargrave has alleged that he was married to his wife in Baltimore City, State of Maryland, about the 15th., December 1919; is that correct to the best of your knowledge and belief?

A. Yes.

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

A. Yes.

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

A. Yes.

5 Q. Have you talked with them?

A. Yes.

6 Q. Has she ever admitted that she was married to

## Antonie Ridrigs.

him?

A. Yes; she said that he was her husband; yes, she said that in the presence of me, but she said that she liked a good time.

7 Q. Are they living together now?

A. No.

8 Q. Did he leave her or did she leave him.

A. I can not say whether he left her or she left him; I did not know anything about that.

9 Q. Have they been separated since the 7th., of August 1921?

A. Yes.

10 Q. Who do you think is the fit and proper party to have the custody of the minor child in this case?

A. I think he is.

11 Q. What has been Mr. Hargrave's conduct ever since you have known him.

A. I have always known him to be a perfect gentleman ever since I have known him; that is the reason that I tried to help him out in this case.

12 Q. Has his conduct been above reproach both before and since the separation?

A. Yes.

Antonie Ridrigs.

13 Q. Now, to your knowledge have the parties to this suit been residents of Baltimore City, State of Maryland, for more than two years prior to the filing of this suit?

A. Yes.

14 Q. Now, tell us, if you please, what you know about the Defendant committing adultery.

A. Well, before September,-- In December she was running to meet this fellow; she was there every day to meet him in December, and the summer time she came down there about ten O'clock and remained there until three or four O'clock, and he would take her to the car, and then when she came in the morning, he would meet her, and she would come and stay all day with him; at that time they were occupying the front room, and I would see both of them in the room together, and I went into the house several times, and I saw them together loving just the same as husband and wife will do.

15 Q. Did you ever see them in the bed room together.

A. Yes.

16 Q. In the house.

A. Yes; in the house.

## Antonie Ridrigns.

17 Q. About when?

A. I can not say when; there was so many different time that they were in there together.

18 Q. During what period of time?

A. Well, that was in July.

19 Q. 1921?

A. 1921. I have seen them often; it was so many times that I saw them together, I could not kind of tell.

20 Q. What was the number of the house in which you would see them.

A. 312, and I lived in 310,- next door to me,- 312.

21 Q. Tell us what you saw the first of September 1921.

A. The 1st., of September 1921, Mr. Hargrave's approached me, and asked me would I give him permission to come to my house to find out certain things about his wife, and I said certainly that I would give him the permission, and me and him went into the back yard, and you could look from my back yard into the room next door where she and this man Burr lives, and we saw both of them in there together, and then she and this fellow came near the window and she had a gauze shirt on, and he had his undershirt on, and they looked out of the window



Antonie Ridrigs.

five or ten minutes, and then they went back farther into the room, and then we went out further into the back yard, and we saw this fellow and her getting ready for bed.

22 Q. What do you mean; putting on their night gowns.

A. No; they were going to bed then. From the window they went over to the bed; they ~~did~~ not have any night gowns on; she had a gauze shirt on and he has his under shirt on.

23 Q. Did they go to bed.

A. Yes; they went to bed, and then we went to my second story back, and we could look and see them both in the bed together,- I mean, hear them in bed together, but you could not hear what they were saying. That was at about half past twelve or one O'clock.

24 Q. What was the name of the fellow that she lived with?

A. Will Burr.

25 Q. How long did she live with Will Burr.

A. She was living with him from the month of August,- she removed some furniture from there from the country, and then she and he began to live together,- after she moved the furniture from the country, and then she got a

Antonie Ridrigns.

letter or something about the divorce, and after that she would only stay there two or three nights with him, and then she would go back to the country, and her mother wrote to her and said that she could not come there to stay until the case was over.

26 Q. Has Mr. Hargrave's lived or cohabited with her since that time?

A. No sir.

27 Q. Has he lived or cohabited with his wife since he discovered that she was untrue?

A. Not to my knowing.

28 Q. Who do you think is the proper party to have the care and custody of the child?

A. Mr. Hargrave, I think.

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

Antonio  
L. his  
+ Ribouge  
mark

Just  
Robt. M. Gaspard

LILLIAN RIDRIGS, 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. Lillian Ridrigs, 310 College Alley; chambermaid.

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

A. Yes; for about one year.

BY MR. BOND:

1 Q. What relation exists between them.

A. They are husband and wife; they both told me they were married, and they lived together as husband and wife.

2 Q. How long have they lived in Baltimore City State of Maryland.

A. As long as I have known them; they lived here when I met them.

3 Q. Are they living together now?

A. No.

4 Q. Which left the other?

A. Mr. Hargrave.

5 Q. Why did he leave?

A. On account of another man.

## Lillian Ridrigs.

6 Q. The Bill in this case charges the Defendant with adultery; what do you know about it?

A. Yes; she lived right next door to me in her mother's house with a man named Willie Burr; she lived with this man from the time her husband left her until this divorce case was started, then she went to Govanstown to live, and she is living there now.

7 Q. When was it they separated.

A. In August 1921, and she went to ~~her~~ live with this man at once.

8 Q. Tell us what you observed July 4th., 1921.

A. On July 4th., she was in from Govanstown with this Will Burr, and they were drinking all day, and about eight O'clock they went upstairs and undressed and got ready for bed, and this Burr remained with her all night; I could see them from my back, and I saw them undress in the room together.

9 Q. Have you ever been in the same bed room when they undressed together?

A. No, but I have been in the front room with her mother and saw them do this in the back room.

Lillian Ridrigs.

10 Q. What was the date of this?

A. It was July 4th., 1921, and I have seen them in this bed room at other times, but not undressed.

11 Q. Was that during the period that they were living together?

A. Yes; in 1921, in July, and before he left his wife.

12 Q. Did he know it.

A. I dont think he did.

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

A. Yes; one little boy.

14 Q. Who has that boy?

A. The mother.

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

A. The fathr.

16 Q. Is he able to support and maintain the child.

A. Yes.

17 Q. What was his conduct towards his wife?

A. He was very nice to her; she told me herself, and he provided for her.

18 Q. Did she ever ssay anything about Burr?

Lillian Ridrigs.

A. She told me that she liked the outside man best, and that she was going to have him.

19 Q. Has Mr. Hargrave lived or cohabited with his wife since the separation?

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

Lillian Richards



FLOYD FLACKS, 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. Floyd Flacks, 1369 Carey Street; laborer.
- 2 Q. Do you know the parties to this suit?  
A. Yes. I have known him all his life, and her about two years.

BY MR. BOND:

- 1 Q. Whar relation are they.  
A. They are married; they have both told me, and they lived together as husband and wife and I have been to their home.
- 2 Q. How long has he lived in Baltimore, Maryland?  
A. About four years.
- 3 Q. Are they living together now?  
A. No.
- 4 Q. Which left the other?  
A. He did.
- 5 Q. Why?  
A. Because of a man; he left her in the late Summer.
- 6 Q. The Bill in this case charges adultery; what,

## Floyd Flacks

if anything, do you know about it.

A I know that I saw her, and this man together in a room and they were undressing, and shortly afterwards they put the light out; I saw it from my back yard and Mr. Hargrave was at my house at that time. It happened about twelve O'clock P. M. I saw them come in at about half past eleven. This was in September - September 1st., 1921, and the house was on College Alley in the rear of Mr. Toney's house; Mr. Hargrave asked me to go with him. I went to the house and they invited me into the back yard to look, and the back door was open and I saw her and this man there.

7 Q. What kind of a room was it

A. A bed room; you can see the bed room.

8 Q. Was there any children born of this marriage?

A. Yes; one boy.

9 Q. Who has him.

A. His mother.

10 Q. Which parent is the proper one to have the child.

A. I think his father should; from what I learn she wants to put him in an Orphan Asylum.

11 Q. Is he able to care for him.

Floyd Flacks.

A . Yes.

12 Q. How did he treat his wife?

A. Very nice, and he provided for her.

13 Q. Since the separation, have they lived or cohabited together?

A. No; not to my knowledge.

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

Floyd Leck

SERVE ON

<sup>sp 9/13/22 (m)</sup>  
Charles Hargraves  
Shae Department, 2nd  
floor - ~~100~~ Bernheimer's  
Lexington St, City.

CT. CT. No. 2.

38 B <sup>394</sup>  
1922

Charles Hargraves

vs.

Ellen Hargraves

ORDER OF COURT NISI  
For Contempt

Order: 13 September 1922

No. 20771 B.

<sup>ix</sup>  
Copy of Order

Filed 13 September 1922

9

Copy of the within Order of Court served on Charles Hargraves  
on the 13<sup>th</sup> day of September 1922 in presence of Peter L King

Thomas F. McVerty  
Sheriff

Fees \$ 0.50

Charles Horgraves

vs.

Ellen Horgraves

IN THE  
Circuit Court No. 2

OF

BALTIMORE CITY.

Ordered by the Circuit Court No. 2 of Baltimore City this 13 day of September, 1922  
that the ~~Defendant~~ Plaintiff appear before this Court in person,  
on the 15<sup>th</sup> day of September, 1922, at 10 o'clock A. M., and then and there show  
cause, if any he may have, why he should not be punished for contempt of this Honorable Court  
in not obeying the Order of this Court passed on the 21 day of Oct, 1921,  
directing the payment of Alimony, pendente lite, by him to the Defendant; provided, a  
copy of this Order be served on the said plaintiff on or before the 14<sup>th</sup> day  
of September, 1922.

Charles J. Quinn

Judge.

True Copy: Test

Clerk.