

In the Circuit Court

Baltimore City ³¹⁰

Howard Hatchell 1921

vs

Florence Hatchell

alias

Roseme Lee

Petition for James M. Curran

Mr Clerk please file

(~~John~~) Davis

B 22 600

(1)

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

Ed June 1921

Howard Hatchett

In The Circuit Court

vs.

of

Florence Hatchett (Alias Lee)

Baltimore City.

To The Honorable, The Judge of Said Court:

Your orator complaining, respectfully says:-

FIRST, that the parties hereto were married on or about October 10th. 1907 by a minister of the gospel at Towson Maryland and lived together as man and wife until on or about June 10th. 1918.

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 orator toward his wife has always been kind, affectionate and above reproach, she without any just cause or reason abandoned and deserted him and has declared her intentions to live with him no longer, that such abandonment has continued uninterruptedly for more than three years prior to the filing of this bill of complaint and was deliberate and final, and beyond any reasonable hope or expectation of reconciliation.

FOURTH, that your orator has never condoned nor forgiven the said desertion, that he has never co-habited with the said respondent since the desertion.

FIFTH, that there are no children born as a result of this marriage.

THEREFORE YOUR ORATOR PRAYS:

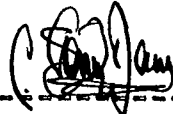
a-a A divorce a Vinculo Matrimonii from the respondent.

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

May it please Your Honor to grant unto your orator a writ of subpoena, directed unto the said respondent, commanding her 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.

Complainant



Solicitor For Complainant.

113-133

310 B61 Ct. Ct.
1921 Docket No.

Hatchett
Hatchett

1642 E Monument
Home after 8 pm.

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pro

No. B 22600

(2) (3)

Filed 12 July 1921
J. S. Durs SOLICITOR

3

Thomas F. McQuilty
Sheriff

Nov Est.
(Emkelstein)

July 13-1921

Subpoena re-used to August retumday

Jack Whiteford
CR

Thomas F. McQuilty
Sheriff

Nov Est.
Emkelstein

EQUITY SUBPOENA

The State of Maryland

To

Florence Hatchett
Lahar Lee

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

Howard Hatchett

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the **9th** day of **May** 19**21**

Issued the *18.* day of **June**, in the year 19**21**

Chas R Whiteford

• Clerk.

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11.)

Ct. Ct.

192

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed 192

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

To

Florence Hatchett

< alias Lee >



Subpoena re-issd to August return day

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

Howard Hatchett

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the **9th** day of **May** 1921

Issued the *18* day of **June**, in the year 1921

Chas R Whiteford

Clerk.

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11.)

J. J. Lawney

I am informed the party has
summoned out the Plaintiff
Furniture \$1000

1921 No. Docket

Summoned and by
left Samuel M. Cole,
Sheriff

Hatchett
"
Hatchett

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B
22600
4

Filed

6 Sept 1921
J. J. Lawney
Solicitor

Received Aug 10 1921, at
9 A.M. forthwith delivered to
Sheriff of Baltimore County,
William P. Cole, Clerk.

EQUITY SUBPOENA

The State of Maryland

On

Florence Katchett sd

vs *Chas Lee*

Of *Baltimore* 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 *September* 19 *21* to answer the complaint of

Howard Katchett

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 *11* day of *July* 19 *21*

Issued the *8* day of *August* in the year 19 *21*.

Clas K. Whiteford
Clerk

310

Ct. Ct.

1921

Docket

Latchett

vs.

Latchett

Decree Pro Confesso.

Jan 4
B 22600

No.

5

Filed

29 Sept

1921



To Mr. Suppington

15

1921

Howard Hatchett

vs.

Roscoe Hatchett

IN THE
Circuit Court
OF
BALTIMORE CITY.

Term, 191

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 29 day of September in the year nineteen hundred and Twenty one 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.

Charles H. Hunsler

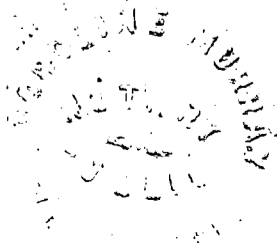
STATE OF MARYLAND,
BALTIMORE CITY, SCT :

I hereby certify that on this 10th day of September 1921 before me, the subscriber, a Notary Public, of the State of Maryland, in and for the City aforesaid, personally appeared: Howard Hatchett 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.

+ Howard Hatchett

Caroline Murray
Notary Public.



3/12/14/32

Doc. 73 310
1921

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Howard Hatchett

vs.

Louise Hatchett

No. 22600 B

PLAINTIFF'S COSTS

Examiners.....\$.....
Copies.....
Sheriff.....
Stenographer.....
\$.....

DEFENDANT'S COSTS

Examiners.....\$.....
Copies.....
Sheriff.....
Stenographer.....

sd 19 Oct 1921

Howard Hatchett

vs.

Flourence Hatchett

In the Circuit Court

OF BALTIMORE CITY.

Decree Pro Confesso having been passed in said 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 twenty-ninth day of September 1921, met on the twenty-ninth day of September in the year nineteen hundred and twenty-one at my office, in the City of Baltimore, in the State of Maryland, and assigned the twenty-ninth day of September in the same year at three o'clock in the afternoon and the office of Messrs. Davis & Bishop in the City and State aforesaid, as the time and place for such examination of witnesses in said cause; at which last mentioned time and place I attended, due notice of such meeting having been given, and proceeded in the presence of the Solicitor of the plaintiff to take the following depositions, that is to say:—

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Hatchett,

v.

Hatchett.

Testimony taken at the office of Messrs Bishop and Davis, Pleasant Street, Baltimore, Maryland, September 29th., 1921, at 3 O'clock P. M.

HOWARD HATCHETT, the Plaintiff in this case, produced on his own behalf, 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. Howard Hatchett, 1405 Askew Avenue; hod carrier.
- 2 Q. Do you know the parties to this suit?
- A. I am the Plaintiff and my wife is the Defendant.

BY MR. DAVIS:

- 1 Q. When were you married?
- A. October 10th., 1907.
- 2 Q. Were you married by a Minister of the Gospel.,
- A. Yes.
- 3 Q. In Baltimore, Maryland.
- A. No, in Towson, Baltimore County.
- 4 Q. Were you married by a Religious Ceremony?
- A. Yes.
- 5 Q. Have you been a resident of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit.
- A. Yes.

Howard Hatchett.

6 Q. What was your conduct towards your wife; how did you behave yourself.

A. I did all that I could.

7 Q. State whether or not you were always a kind, affectionate and faithful husband?

A. Yes.

8 Q. Are you and your wife living together now?

A. No sir.

9 Q. Which left the other?

A. She left me.

9 Q. When.

A. 1918 - June 10th.

10 Q. Did she have any just cause or reason to abandon and desert you at that time?

A. No sir.

11 Q. Just what happened at that time?

A. I do not know. She just left.

I went to work and when I came home from work she was gone.

12 Q. Have you ever been able to locate her since that time?

A. No sir.

13 Q. Has this abandonment continued uninterruptedly since June 10th., 1918.

Howard Hatchett.

A. Yes.

14 Q. Have you lived or cohabited with her since that time.

A. No sir

15 Q. State whether or not said abandonment was deliberate and final; did she deliberately and finally abandon and desert you?

A. Yes.

16 Q. State whether or not there is any reasonable expectation of a reconciliation; do you ever expect to make up and live together again?

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---- *No*

Edward Ketchett

MARTHA WYETT, 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. Martha Wyett, 1405 Askew street; house work.
- 2 Q. Do you know the parties to this suit?
A. Yes.

BY MR. DAVIS:

- 1 Q. Are they husband and wife?
A. Yes.
- 2 Q. Did they live together as husband and wife and were they always known and recognized in the community in which they lived as husband and wife?
A. Yes.
- 3 Q. Has the Plaintiff been a resident of Baltimore City State of Maryland, for at least two years prior to the filing of this suit?
A. Yes.
- 5 Q. Are there any children of this marriage?
A. No sir.
- 6 Q. What was his conduct towards his wife while living together? How did he behave himself?
A. He seemed to be all right.
- 7 Q. State whether or not he was always a kind, affectionate and faithful husband?

Martha Wyatt.

8 Q. Yes

8 Q. Are the parties to this suit living together now?

A. No sir.

9 Q. Which left the other?

A. She left him.

10 Q. When?

10th.

A. About June 1918.

11 Q. Did she have any just cause or reason to abandon and desert his wife at that time?

A. No sir.

12 Q. State what happened at that time.

A. She said that she was going to leave. He went to work that day, and when he came home she was gone, and while he was away she said that she was going to leave and not come back to him any more.

13 Q. Did you see her on the day that she left her husband.

A. Yes.

15 Q. And that is what she told you.

A. Yes.

15 Q. Has he ever been able to locate her since that time?

A. No sir.

17 Q. Has this abandonment continued uninterruptedly since June 10th. 1918?

Martha W.ett.

since June 10th., 1918?

A. Yes.

18 Q. State whether or not said abandonment was deliberate and final?

A. Yes.

20 Q. State whether or not there is any reasonable expectation of a reconciliation?

A. No sir; there is not.

20 Q. Is there any hope of ~~you~~^{them} making up?

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.---

No.
Martha Watter

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 18 day of June in the year of Our Lord nineteen hundred and twenty-one at the City of Baltimore, in the State of Maryland.

A. de Russey Sappington (SEAL).
Examiner.

There are one Exhibits with these depositions, to wit:

Plaintiff's Exhibit 1

Defendant's Exhibit 1

A. de Russey Sappington
Examiner.

I, A. de RUSSY SAPPINGTON, the Examiner before whom the foregoing depositions were taken, do hereby certify that I was employed in assigning a day, and taking the said depositions upon two days, on both of which I was employed by the Plaintiff, and on none by the Defendant.

A. de Russey Sappington
Examiner.

Circuit Court

310
19 21 B61 Docket No.....

Hatchett

vs.

Hatchett

Order of Reference
and Report

Roberson

22600

No.....

7 ✓

Order Filed 20 day of Oct 19 21

Report Filed.....day of.....19

Howard Hatchett

IN THE

310

Circuit Court

vs.

Florence Hatchett
Mrs. Lee

OF

BALTIMORE CITY

Sept

Term, 19 21

20

This case being submitted, without argument, it is ordered by the Court, this
day of October, 19 21, that the same be and it is hereby referred to
Alexander H. Robertson, Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.

(Signature)

Report of Auditor and Master

Bill filed by husband against wife for divorce A Vinculo
Matrimonii for abandonment for three years. Code Article 16, Section 36.
Defendant summoned, no answer, decree Pro Confesso, thirty
days elapsed. Proof shows marriage, residence and abandonment for,
at least, three years continuous, deliberate, final and without hope
of reconciliation. Case ready for decree.

(Signature)

Auditor & Master.

CIRCUIT COURT

B. 310
1921 No. Docket

Howard Hatchett

VS.

Florence Hatchett
(Alias Lee)

Recorded
Folio 275
~~267~~ 1921

Decree of Divorce

B 22600

B No. 8

11 November 1921

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

Alex. Robertson
Auditor and Master.

