

3/12/13/7

In The Circuit Court
A.B. 169
Baltimore City 1920

Herman Gibson

vs

Olive Gibson

Bill for Inure a Vests

Mr. Clerk please file

(Herman) Gibson

B 20787

(1)(2)

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BALTIMORE, MD.

A 24 March 1920

Herman Gibson

In the Circuit Court

vs.

of

Olive Gibson

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 the 2nd. day of June, 1917, in Washington D.C. and lived together as man and wife until on or about December 17, 1917.

SECOND, That your Orator is a resident of the city of Baltimore, state of Maryland, and has been for more than two years prior to the filing of this bill of complaint. That the respondent is a non-resident of the city and state of Maryland and when last heard of was in Washington D.C.

THIRD, That though the conduct of your orator towards his wife has always been kind, affectionate, and above reproach, she without any just cause or reason, abandoned your orator; to live in adultery. That the said Olive Gibson has on divers days and times committed the crime of adultery, and with divers men whose names are unknown to your Orator.

FOURTH, That your Orator has not lived with the said Olive Gibson, since he discovered the said adultery, nor has he condoned the said adultery.

FIFTH, That there are no children born as a result of said marriage.

WHEREFORE YOUR ORATOR PRAYS:

- a- A divorce a vinculo matrimonii from the respondent.
- b- Such other and further relief as the case may require.

May it please your honor to grant unto your Orator, an order of publication, setting forth the nature and substance of this bill and warning the said respondent to be in this court in person or appear by solicitor on or before a certain day, to be therein named and show cause, if any she may have, why a decree should not be passed as prayed.

As in duty bound etc.

Herman Gibson
Complainant

Edward J. Jari
Solicitor for Complainant.

State of Maryland)
) To wit
Baltimore City.)

I hereby certify that on this 23rd day of March, 1920
before me the subscriber, a notary public in and for the county of
Baltimore, state of Maryland, personally appeared Herman Gibson,
the complainant in the foregoing bill and made oath in due form
of his knowledge and beleif.

Arthur N. Roque
Notary Public.

J. Steward Davis

118 E. Lexington St.

In The Circuit Court of Baltimore City.

Herman Gibson Vs. Olive Gibson.

ORDER OF PUBLICATION:

The object of this suit is to procure a decree for a divorce A Vinculo Matrimoniii, by the plaintiff from the defendant.

The Bill states that the parties thereto were married in Wash. D.C. on or about the 2nd. day of June, 1917 and lived together as man and wife until on about the 17th. day of December 1919. That the plaintiff is a resident of the city of Baltimore, state of Maryland and has been for more than two years prior to the filing of the bill of complaint/ That the defendant is a non-resident of this city and state, and when last heard of was in Wash. D.C. That though the conduct of your orator towards his wife has always been kind, affectionate, and above reproach, she without any just cause or reason, abandoned your orator; to live in adultery. that the said Olive Gibson has on divers days and times committed the crime of adultery, and with divers men whose names are unknown to your Orator. That there are no children born as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City, ordered this ^{24th} day of ^{March} 1920. That the plaintiff by causing a copy of this order to be inserted in some daily newspaper, published in the city of Baltimore, once a week for four successive weeks, before the ²⁶ day of ^{April} 1920. and give notice to the said defendant, Olive Gibson (Now absent) of the object and substance of this Bill and warning him to be and appear in this Court in person or by solicitor, on or before the ¹² day of ^{May} 1920. to show cause if any she may have, why a decree should not be passed as prayed.

Robert F. Stanton

vs. Morgan

169
192 *Bles* Docket No.

Gibson

vs.

Gibson

Certificate of Publication

THE DAILY RECORD

Handwritten notes:
B...
...

3
no 987
(3)

THE DAILY RECORD.

Filed *24* day of *May* 1920

THE DAILY RECORD

APR 15 1920

Baltimore, , 192

J. Steward Davis, Solicitor,
118 E. Lexington St.

IN THE CIRCUIT COURT OF BALTI-
MORE CITY —(B-169-1920)— Herman
Gibson vs. Olive Gibson.

ORDER OF PUBLICATION.

The object of this suit is to procure a decree for a divorce a vinculo matrimonii by the plaintiff from the defendant.

The bill states that the parties thereto were married in Washington, D. C. on or about the 2nd day of June, 1917, and lived together as man and wife until on or about the 17th day of December, 1919. That the plaintiff is a resident of the City of Baltimore, State of Maryland, and has been for more than two years prior to the filing of the bill of complaint. That the defendant is a non-resident of this city and State, and when last heard of was in Washington, D. C. That though the conduct of your orator towards his wife has always been kind, affectionate and above reproach, she, without any just cause or reason, abandoned your orator, to live in adultery. That the said Olive Gibson has on divers days and times committed the crime of adultery, and with divers men whose names are unknown to your orator. That there are no children born as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City, ordered, this 24th day of March, 1920, that the plaintiff by causing a copy of this order to be inserted in some daily newspaper, published in the City of Baltimore, once a week for four successive weeks, before the 26th day of April, 1920, and give notice to the said defendant, Olive Gibson (now absent), of the object and substance of this bill and warning her to be and appear in this Court, in person or by solicitor, on or before the 12th day of May, 1920, to show cause, if any she may have, why a decree should not be passed as prayed.

ROBERT F. STANTON.

True copy—Test

CHAS. R. WHITEFORD,
Clerk.

mh25ap1,8,15

We hereby certify that the annexed advertise-

ment of Order

Publication

Circuit Court

of Baltimore City, Case of

Herman Gibson
Olive Gibson.

vs.

was published in THE DAILY RECORD, a daily newspaper published in the City of Baltimore, once in each of *Your* successive weeks before the

26th day of *April*, 1920

First insertion *March, 25th*, 1920

THE DAILY RECORD.

Per *Madison W. Crapster*

169
19170

Bleo
Docket

Ct. Ct.

Gibson

vs.

Gibson

Decree Pro Confesso.

Q 20987

No.

Case (4)

Filed 24 May 1917



Circuit Court
BALTIMORE CITY

Decree Pro Confesso

Herman Gibson
vs.

Olene Gibson

IN THE
Circuit Court
OF
BALTIMORE CITY.

May Term, 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 24 day of May 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. Stanton

STATE OF MARYLAND,
BALTIMORE CITY, SCT :

I hereby certify that on this 24th day of May 1920 before me, the subscriber, a Notary Public, of the State of Maryland, in and for the City aforesaid, personally appeared Herman Gibson 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.

Robert F. Stanton
Notary Public.

x Herman Gibson



Docket B. 169/1920

IN THE CIRCUIT COURT

Herman Gibson

VS

Olive Gibson

DEPOSITIONS

B No. 20789

PLAINTIFF'S COSTS

Examiner \$ 8.00

Copies

Notices

Sheriff

Stenographer 2.00

\$ 10.00 *Paid*

DEFENDANT'S COSTS

Examiner \$

Copies

Notices

Sheriff

Stenographer

\$

ALFRED J. CARR, Examiner

Filed 9 day of June 1920

Herman Gibson

vs.

Olive Gibson

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
- - - 24th - - - - - day of -- May - - - - - 1920, met on
the - - 24th - - day of - - May - - in the year nineteen
hundred and twenty - - at my office, in the City of Baltimore, in the State
of Maryland, and assigned the 24th - - - day of May - - - -
in the same year at 3.30 - - 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:—

HERMAN GIBSON, the Plaintiff produced in his own behalf, being duly sworn, deposes and saith as follows:

BY THE EXAMINER:

1Q. State your name, residence and occupation.

A- Herman Gibson, 301 N. Eden Street, Baltimore, and I work as a Laborer at Sparrows Point, Maryland.

2Q. Who are the parties to this suit?

A- I am the Plaintiff, and Olive Gibson is my wife, the defendant.

BY MR. DAVIS:

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

A- On June 2nd, 1917, in Washington, D.C., by the Reverend Mr. Wesley, a Minister of the Gospel.

4Q. Have you been a resident of the City of Baltimore, State of Maryland, for more than two years prior to March 24th, 1920?

A- Yes. I have been here four years.

5Q. Is your wife now or was she on March 24th, 1920, a resident or a non-resident of the State of Maryland?

A- She is a non-resident of the State of Maryland.

6Q. Where is she?

A- I do not know. The last I heard of her she was in Washington, D. C.

7Q. What has been your conduct and treatment towards your wife during the whole of your married life?

Herman Gibson

A- I was a good true faithful husband to her. I treated her kindly, and I provided for her.

8Q. Are you now living together?

A- No.

9Q. Which one left the other?

A- She left me.

10Q. Why did she leave you?

A- She left me because she wanted to go with another man, named Cliff Freeman.

11Q. When did she leave you?

A- On December 17th, 1917.

12Q. You say she left you on December 17th, 1917?

A- Yes.

13Q. Where did she go, if you know, and with whom?

A- With Cliff Freeman, and lived four doors away from me.

14Q. Whose house was that?

A- There were a lot of boys staying there.

15Q. Did you see them together there?

A- Yes, three days after we parted.

16Q. Did they live together as man and wife?

A- Yes. I went there to see Abe Bartis, who lived near there, and I saw my wife and Cliff Freeman in a bed-room together.

17Q. Were any children born of this marriage?

A- No.

Herman Gibson

18Q. Have you ever seen your wife anywhere else with this man Cliff Freeman?

A- Yes.

19Q. Where?

A- On the street, and in the Theatre, and in Mr. Stott's house.

20Q. Did your wife have a room at this house?

A- Yes.

21Q. You were not living with her at that time?

A- No.

22Q. Did Cliff Freeman come to see her there?

A- Yes.

23Q. Did you ever see him in her bed-room there?

A- Yes.

24Q. How was she dressed when you saw her?

A- In a night-gown.

25Q. You looked in her room?

A- Yes.

26Q. In what position was she?

A- She was in the bed, and he was sitting down on the bed.

27Q. Did you ever see them at any other house together?

A- Yes. I saw them at Mr. Cook's house on Fourth Street, Steelton, Pennsylvania.

28Q. Where did you see them in that house?

A- In a bed-room.

Herman Gibson

29Q. Did he have a room there?

A- Yes.

30Q. And you saw her and Cliff Freeman in there?

A- Yes.

31Q. Have you ever lived with your wife or cohabited with her since you discovered that she was committing Adultery with this Freeman?

A- No, I have not.

32Q. Have you ever forgiven or condoned her offenses?

A- No, I have not.

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 Herman Gibson

FRANK STOTTS, a witness produced on behalf of the Plaintiff, being duly sworn, deposeseth and saith as follows:

BY THE EXAMINER:

1Q. State your name, residence and occupation.

A- Frank Stotts, 71 Frederick Street, Steelton, Pennsylvania, and I keep a Boarding House.

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

A- Yes, I know both of them. I have known them ever since their birth.

BY MR. DAVIS:

3Q. Were you present at the marriage?

A- No.

4Q. Do you know whether they lived together as man and wife, and were so known among their neighbors and relatives and friends, and whether that was their reputation?

A- Yes, I know that. And He introduced her as his wife.

5Q. Were any children born of this marriage?

A- No.

6Q. Do you know whether Mr. Gibson, the Plaintiff in this case, has been a resident of the City of Baltimore, State of Maryland, for more than two years prior to March 24, 1920?

A- Yes, I know that.

7Q. Is she a resident or a non-resident of the State of Maryland?

A- She is a non-resident of the State of Maryland. She is in Washington, D. C.

Frank Stotts

8Q. Where did she live before going to Washington, D. C.?

A- She lived in Steelton, Pennsylvania, and then went to Washington, D. C., with Cliff Freeman.

9Q. The parties to this suit separated on December 17th, 1917. Do you know that?

A- Yes, it was in December, 1917.

10Q. Which one left the other?

A- She left him.

11Q. How do you know that?

A- Because she was a woman who rented a room at my son's house, Number 69 Frederick Street, and she lived there by herself. And Cliff Freeman was also rooming there at the same time, and he was always coming to her room.

12Q. She had a room there before Cliff Freeman had a room there?

A- Yes.

13Q. And Cliff Freeman would come to her room when she had a room there at that time?

A- Yes.

14Q. Have you ever seen him on the street with her?

A- Frequently.

15Q. At what hours of the night?

A- I used to see them anywhere from seven to ten o'clock.

16Q. Do you know anything about her relations with Cliff Freeman?

Frank Stotts

A- Yes. I lived in the same house where she lived then, and I know that she would go out and stay out all night. This was before she left her husband. She used to come in as late as ten o'clock at night with Cliff Freeman.

17Q. Do you know anything about their having been at Mr. Cook's house together?

A- No.

18Q. Do you know with whom she lived in Steelton, Penna.?

A- With Cliff Freeman, and then she went to Washington D. C., to live as man and wife with him.

19Q. Has Mr. Gibson lived with or cohabited with his wife since he discovered her adultery?

A- No, he has not.

20Q. What was his treatment and conduct towards his wife during the time they lived together?

A- Kind, affectionate, and hard working man, and a good provider.

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 Frank Stotts

JENNIE HALL, a witness produced on behalf of the Plaintiff, being duly sworn, deposeth and saith as follows:

BY THE EXAMINER:

1Q. State your name, residence and occupation, if any.

A- Mrs. Jennie Hall, 71 Frederick Street, Steelton, Pennsylvania, and I am a housewife. I keep house for Mr. Stotts, the gentleman who has just testified.

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

A- I do. I have known them about ten or fifteen years at least.

BY MR. DAVIS:

3Q. Were you present at the marriage?

A- No.

4Q. Do you know whether or not they were known among their friends and acquaintances as being a married couple, and whether they lived together as man and wife, and whether that was their general reputation in the community in which they lived?

A- Yes, and I know he brought her to Steelton, Pennsylvania, and introduced her as his wife.

5Q. Do you know if Mr. Gibson has been a resident of the City of Baltimore, State of Maryland, for more than two years prior to March 24th, 1920?

A- Yes, he has.

6Q. Do you know whether or not she is a resident of a non-resident of the State of Maryland?

Jennie Hall

A- She does not live in Maryland. I know she left Steelton, Pennsylvania, to go to Washington, D. C., with Cliff Freeman as man and wife. She has never lived in Maryland.

7Q. What kind of a husband was he to her?

A- Always kind and affectionate to her. Always working hard, and brought all his money to her. He was a true faithful husband.

8Q. They separated on December 17th, 1917. Which one left the other?

A- She left him.

9Q. How do you know that?

A- I know that she was running with this Cliff Freeman. She was boarding at 69 Frederick Street, Steelton, Pennsylvania, and Cliff Freeman used to come down to see her there, and finally he came there to live.

10Q. Did you ever see her with Cliff Freeman?

A- Yes. I have seen her on the street with him, and I have seen her in her bed-room with him, together.

11Q. How often?

A- More than once.

12Q. This was at 69 Frederick Street?

A- Yes.

13Q. Have you ever seen her anywhere else with him?

Jennie Hall

A- On the street about ten o'clock and ten-thirty o'clock at night, and they came in together as man and wife frequently, and everyone knew he went with her.

14Q. Did you see him and her at third Street together?

A- No.

15Q. Do you know anything about Mr. Cook's house?

A- No.

16Q. Do you know that she left Steelton, Pennsylvania to go to Washington, D. C., to live with Cliff Freeman as man and wife?

A- Yes.

17Q. Has Mr. Gibson ever lived with or cohabited with his wife since he discovered her adultery?

A- No.

18Q. Were any children born of this marriage?

A- No.

- - - - -


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:

See
Her
No Jennie Hall
mark.
Alfred Carr

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 _____ day of _____ -- June -- _____ 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.

169

Circuit Court

1920

19

169 Docket No.

William Gibson

vs.

Olive Gibson

Order of Reference
and Report

B. O. J.
No. *20787*

(6)

Order Filed *17* day of *June* 19 *20*

Report Filed day of 19

Herman Gibson

vs.

Olene Gibson

IN THE
Circuit Court

OF
BALTIMORE CITY

May

Term, 1920

This case being submitted, without argument, it is ordered by the Court, this 18th day of June, 1920, that the same be and it is hereby referred to Ward B. Cox, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Robert F. Stanton

Report of Auditor and Master

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

Defendant proceeded against as a non-resident and her non-residence proven.

Plaintiff's residence in Baltimore City for more than two years proven.

The marriage proven.

The adultery proven.

A decree pro confesso was passed against the defendant and more than thirty days have since elapsed.

Case ready for decree.

Ward B. Cox

Auditor and Master.

Fee \$9 paid.

June 24th, 1920.

1/20

CIRCUIT COURT

B-169-

1920.

No. 60 Docket

HERMAN GIBSON

VS.

OLIVE GIBSON.

Decree of Divorce

B 20787

B No.

(7)

fd 8 July 1920

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

Maud B. Cox

Auditor and Master.

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

HERMAN GIBSON

VS.

OLIVE GIBSON

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 *8th* day of *July*, A. D. 1920,

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said *Herman Gibson* the above named Complainant be and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, *the said Olive Gibson.*

And it is further Ordered, That the said *complainant* pay the cost of this proceeding.

Thomas J. [Signature]