

In the amount of
62 B 3
Baltimore City 1922

Manon Humbel

vs

George Humbel

Recd for Divine A. Vincent

With check please find



323287
(1) (2)

DAVIS & BISHOP
ATTORNEYS AT LAW
BANNEKER BUILDING
4 E. PATTEN ST.
BALTIMORE, MD.
Ad 3 January 1922

MARION HUNTER

IN THE CIRCUIT COURT

VS

OF

GEORGE HUNTER

BALTIMORE CITY.

.....

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your oratrix complaining, respectfully says:-

FIRST, that the parties hereto were married on or about February 3rd.1914 in Atlantic City, New Jersey, by Rev. Martin a methodist minister and lived together as man and wife until June 13, 1918.

SECOND, that your oratrix 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 defendant is a non-resident of the State of Maryland and when last heard of was in Nassau, West Indies.

THIRD, that though the conduct of your oratrix toward her husband has always been kind, affectionate and above reproach, he without any just cause or reason abandoned and deserted your oratrix, and has declared his intentions to live with her 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 oratrix 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 said marriage.

WHEREFORE YOUR ORATRIX PRAYS:

- a-a A divorce A Vinculo Matrimonii from the respondent.
- b-b That her maiden name ^{J. Clarke} be resumed, ~~to be~~.
- c-c Such other and further relief as the case may require.

May it please Your Honor, to grant unto your oratrix,
an order of publication, setting forth the nature and substance
of this bill and warning the said defendant 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 he may have why a decree
should not be passed as prayed.



ATTORNEY FOR PLAINTIFF.

J. STEWARD DAVIS, SOLICITOR

14 E. Pleasant St.

IN The Circuit Court of Baltimore City.

Marion Hunter versus George Hunter.

ORDER OF PUBLICATION:

The Bill states that the parties thereto were married in the State of Atlantic City, New Jersey on or about February 3rd. 1914 and lived together as man and wife until on or about the 13th. day of June 1918. 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 this bill of complaint. That the defendant is a non resident of this city and state and when last heard of was in Nassau West Indies. That though the conduct of the plaintiff toward her husband was always kind and 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 longer;

There are no children born as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City, ordered this ^{3rd} day of ^{January} 1922; 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 ^{4th} day of ^{February} 1922, and give notice to the said defendant George Hunter (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 ^{21st} day of ^{February} 1922 to show cause if any he may have, why a decree should not be passed as prayed.

Charles W. Heister

3
1922

Docket No.....

Hunter

vs.

Hunter

Certificate of Publication

B 23287
July 26-
(3)

THE DAILY RECORD
Filed *25* day of *July* 192*2*

THE DAILY RECORD

...the kind of ...
...the kind of ...
...the kind of ...
...the kind of ...
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...of Baltimore City ...
...of Baltimore City ...
...of Baltimore City ...
...of Baltimore City ...
...of Baltimore City ...

THE DAILY RECORD

853

JAN 26 1922

Baltimore,....., 192.....

Fourth Insertion.

J. Steward Davis, Solicitor,
14 E. Pleasant St.

IN THE CIRCUIT COURT OF BALTI-
MORE CITY—(B-3-1922)—Marion Hun-
ter vs. George Hunter.

ORDER OF PUBLICATION.

The bill states that the parties thereto were married in Atlantic City, State of New Jersey, on or about February 3rd, 1914, and lived together as man and wife until on or about the 13th day of June, 1918. 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 this bill of complaint. That the defendant is a non-resident of this city and State and when last heard of was in Nassau, West Indies. That though the conduct of the plaintiff toward her husband was always kind and 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 longer. There are no children born as a result of said marriage.

It is thereupon, by the Circuit Court of Baltimore City, ordered this 3rd day of January, 1922, 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 4th day of February, 1922, and give notice to the said defendant, George Hunter (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 21st day of February, 1922, to show cause, if any he may have, why a decree should not be passed as prayed.

CHAS. W. HEUISLER.

True copy—Test:

CHAS. R. WHITEFORD.

ja5,12,19,26

Clerk.

We hereby certify that the annexed advertise-

ment of Order.....*Publication*..... Circuit Court

..... of Baltimore City, Case of.....

vs.....

Marion Hunter
George Hunter

was published in THE DAILY RECORD, a daily news-
paper published in the City of Baltimore, once in each of

.....*Four*..... successive weeks before the

.....*4th*..... day of *February*....., 1922

First insertion.....*January 5th*....., 1922

THE DAILY RECORD

Per.....*Thaddeus W. Crapster*.....

3 B6 d Ct. Ct.
192 2 Docket

O Hunter

vs.

O Hunter

Decree Pro Confesso.

B 23287

No.

Sapp (4)

Filed *25 July* 192 *4*

3/1922

Marion Hunter
vs.
George Hunter

IN THE
Circuit Court
OF
BALTIMORE CITY.

July Term, 1924

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 25th day of July in the year nineteen hundred and twenty four 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 the 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.

E. J. [Signature]

3/12/14/58

Doc. *J* ³ 1922.

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Marion Hunter

vs.
Geo. Hunter

No. *23287 J.*

PLAINTIFF'S COSTS

Examiners *5* \$ *5.00*
Copies
Sheriff
Stenographer
\$ _____

DEFENDANT'S COSTS

Examiners \$
Copies
Sheriff
Stenographer
\$ _____

sd 23 Oct 1922

Marion Hunter

vs.
Geo. Hunter

In the Circuit Court
OF BALTIMORE CITY.

Decease Geo. Conferences 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
25th day of July 19th, met on
the 23rd day of October in the year nineteen
hundred and twenty three at my office, in the City of Baltimore, in the State
of Maryland, and assigned the 23rd day of October
in the same year at 3 o'clock in the afternoon and the
office of A. de Rappington, Esq., 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:—

B.
J-3

1

Hunter,

v.

Hunter.

Testimony taken at the office of A. deR. Sappington, Esq., Baltimore, Maryland, July 26 1923, at three O'clock P.M.

Marion Hunter, a witness of lawful age, produced on her 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. Marion Hunter, 223 West Biddle Street housework.

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

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

By Mr.

1 Q. When were you married?

A. February 3rd., 1914.

2 Q. Were you married by a Minister of the Gospel?

A. Yes.

3 Q. In Baltimore City.

A. Atlantic City, New Jersey.

4 Q. By a Religious Ceremony?

A. Yes.

Marion Hunter.

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.

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

A. No.

7 Q. What was your conduct towards your husband while living together; how did you treat her?

A. Well, I tried to be a good wife to my husband.

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

A. Yes.

9 Q. Are you and your husband living together now?

A. No sir.

10 Q. Which left the other; did he leave her or did -- Did he leave you or did you leave him?

A. He left me.

11 Q. When?

A. June 3rd.

12 Q. What year?

A. 1918.

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

A. No sir.

Marion Huntera

13 Q. What did he say and what did he do at that time?

A. He did not have anything to say.

14 Q. What did he do?

A. He did not do anything; I was out the day- that day, and when I came back he was gone; that is all that I know about it, and I have not seen or heard anything about him since.

15 Q. Did he ever return to you -- Did he ever threaten to leave you prior to that time?

A. No.

16 Q. After you found him gone, did you look for his clothing?

A. Yes.

17 Q. Were they there?

A. No.

18 Q. Then you tell this Court that he simply disappeared and you have no account of him at all; that is what you tell this Court?

A. Yes.

19 Q. Have you endeavored to locate your husband since he abandoned and deserted you?

A. Yes; I have made enquiry about him.

20 Q. Were you ever successful in locating him?

A. No.

Maipn Hunter.

21 Q. When did he abandon and desert you in the manner you have described?

A. I think it was in June.

22 Q. What year?

A. 1918.

23 Q. Has his abandonment and desertion of you continued uninterruptedly since June 1918?

A. Yes.

23 Q. That is, have you lived or cohabited with him since that time?

A. No sir.

25 Q. state whether or not his abandonment and desertion of you was deliberate and final; did he deliberately and finally abandon and desert you?

A. Yes.

25 Q. state whether or not there is any reasonable expectation of a reconciliation?

A. No sir.

27 Q. Is he a resident or a non-resident of the state of Maryland?

A. Non resident; he lives out of the state of Maryland.

28 Q. How do you know that.

A. Because his former home was in Virginia.

Marion Hunter.

29 Q. Where did you last hear of him being?

A. West Indias.

30 Q. Is there any doubt about his being a non-resident of the state of Maryland.

A. I am sure that he is not living in Maryland because I would have been able to locate him some where.

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.---

Marion B. Hunter

Mary Wood, 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. Mary Wood, m^l125 Argyle Avenue, I stay at home.

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

A. Yes.

By Mr. Davis:

1 Q. Any relation to you

A. Mrs. Hunter is my sister.

2 Q. Are the parties to this suit husband and wife?

A. Yes.

3 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.

4 Q. Was the Plaintiff been a resident of Baltimore City, state of Maryland, for atleast two years prior to the filing of this suit?

A. Yes.

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

A. No.

Mary Wood.

6 Q. What was her conduct towards her husband while living together; how did she treat him?

A. She was very affectionate.

7 Q. State whether or not she was always a kind, affectionate and faithful wife?

A. Yes.

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

A. No sir.

9 Q. Which left the other; did he leave her or did she leave him?

A. He left her.

10 Q. When?

A. June 13th., 1918.

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

A. No sir.

12 Q. What did he say and what did he do at that time?

A. He just deliberately and finally walked away.

13 Q. How do you know that.

A. On the day that he left my sister, my sister was visiting my house, which was close by and also the home of my mother, and my sister went home as

Mary Wood.

usual that night,, and shortly after that she came back and she told us that she had gone home and found that her husband had left the house and taken everything with him, and she stayed at our house until the next day, and then I went to her house with her, and I saw that he had taken all of his belongings, and my sister was sick at that time, and she came back to our house, and she has been there ever since.

14 Q. Did your sister go back to her home a number of times to see whether her husband had returned?

A. Yes; she went back there a number of times, and the party from whom she had rented her rooms told her that he had left word that he was going away, and that he would send her money, but she has never seen him or heard from him.

15 Q. Did he always know where to locate his wife if he had wanted to communicate with her?

A. Yes.

17 Q. Was he provided or offered to provide a home for his wife since he abandoned and deserted her?

A. No sir.

17 Q. Was there anything to prevent him doing so if he had wanted to.

A. No sir.

19 Q. Has he shown by his acts that he does not intend to live with his wife any more?

Mary Wood.

A. Yes.

20 Q. Has his abandonment of his wife continued
✓ uninterruptedly since June 1919?

A. Yes.

21 Q. State whether or not said abandonment was de-
liberate and final; did he deliberately and finally
abandon and desert his wife?

A. Yes.

22 Q. State whether or not there is any reason-
able expectation of a reconciliation; do you ever
expect them to make up and live together again?

A. No sir.

23 Q. Is he a resident of the State of Maryland.

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

24 Q. Of what State is he a resident?

A. Virginia.

25 Q. That was his former home where was he when
you last heard of him?

A. West Indies.

26 Q. Are you sure that he is a non-resident of the
state of Maryland?

A. Yes.

27 Q. Is there any doubt about his being a non-
resident of the state of Maryland?

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

Mary Wood.

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 *23rd* ~~20th~~ day of *August* ~~Oct.~~ in the year of Our Lord nineteen hundred and *twenty-three* 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 */*.....

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

23287
192 2

Docket No. 62

Marion Hunter

vs.

George Hunter

Order of Reference
and Report

P 23287

No. ✓

Roberts

6
Apr. 3

25 Oct

Order Filed day of 192 4

Report Filed day of 192

Marion Hunter

vs.

George Hunter

IN THE
Circuit Court

OF
BALTIMORE CITY

September

Term, 1924

25th

This case being submitted, without argument, it is ordered by the Court, this
day of *October*, 1924, 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.

Charles F. Stone

Report of Auditor and Master

Lined area for the report of the Auditor and Master.

in col

Circuit Court

19 _____ Docket _____

Marion Hunter

vs.

George Hunter

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SUBMISSION FOR DECREE.

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Mr. Clerk,
Please file,

Davis Evans

Solicitor & for Plaintiff.

No. B 23 287
(6/1/25)

Filed 17 Feb 1925 19

Marion Hunter

vs.
George Hunter

In the Circuit Court
of Baltimore City

Sept

TERM 1925

To the Honorable

George A. Solter

Judge of Said Court:

The above cause is respectfully submitted for
decree and the 43rd General Equity Rule is hereby waived.

Davis Evans

Solicitor S for Plaintiff,

C. C. Fitzgerald

Solicitor for Defendant.

Circuit Court

23287
192 2

Docket No. 62

Marion Hunter

vs.

George Hunter

Order of Reference
and Report

B 23 287

No.

7

Order Filed 17 day of July 1925
Report Filed 2 day of Dec 1925

Marion Hunter

vs.

George Hunter

IN THE
Circuit Court

OF
BALTIMORE CITY

John

Term, 1925

17th

This case being submitted, without argument, it is ordered by the Court, this day of February, 1925, that the same be and it is hereby referred to Ward B. Coe, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

George A. Salvo

Report of Auditor and Master

Bill for divorce a vinculo matrimonii and for the resumption of her maiden name filed by the wife against her husband on the ground of abandonment. Code Art. 16 secs. 37-42.

Defendant answers by solicitor -- authority in writing.

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

The marriage proven.

The abandonment for three years, its finality and the irreconcilability of the parties proven.

More than thirty days have elapsed since the filing of the bill.

Case submitted and ready for decree.

Ward B. Coe

Auditor and Master.

September 18, 1925.

IN THE
CIRCUIT COURT OF
BALTIMORE CITY.

B 3/1922
MARION HUNTER

VS.

GEORGE HUNTER

PETITION AND ORDER

Mr. Clerk:

Please file.

C. C. Fitzgerald
Attorney for Defendant.

B 23287
8

LAW OFFICES
C. C. FITZGERALD
BALTIMORE, MD.

Ad 15 Aug 1920
215 ST. PAUL PLACE

MARION HUNTER

VS.

GEORGE HUNTER

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*

IN
THE CIRCUIT COURT
OF
BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator, George Hunter says:

That a bill of complaint was filed in this Honorable Court by his wife Marion Hunter, praying a divorce A Vinculo matrimonii setting forth the fact that he was a non-resident etc.

Your Orator says that he admits that at the time of the filing of the Bill of Complaint he was a non-resident, but that he has since resumed his residence and desires to file an answer in the above entitled case.

WHEREFORE YOUR PETITIONER PRAYS:

- (1) That the decree pro confesso be stricken out.
- (2) That he be permitted to file an answer to the bill exhibited in this case.
- (3) That me may have such other and further relief as the case may require.

George E. Hunter
Petitioner


W. B. [Signature]
Attorney for Petitioner.

STATE OF MARYLAND, City of Baltimore, to wit:

I hereby certify that on this 12th day of August in the year 1925, before me a subscriber, a notary public of the State of Maryland, in and for Baltimore City aforesaid, personally appeared George Hunter and made oath in due form of

law that the matters and facts stated and set forth in the
aforegoing petition are true to the best of his knowledge
and belief.

AS Witness my hand and Notarial seal.


Francis Henry

Notary Public.

Ordered by the Circuit Court of Baltimore City this 15
day of ~~July~~^{August} 1925 that the decree pro confesso signed 23rd
day July 1924 be and is hereby stricken out and it is further
ordered that the defendant be and is hereby granted permission
to file his answer.

H. Arthur Plump

IN
THE CIRCUIT COURT OF
BALTIMORE CITY.

B 3
1922
MARION HUNTER

VS.

GEORGE HUNTER

DEFENDANT'S ANSWER

Mr. Clerk:

Please file.

C. C. Fitzgerald
Attorney for Defendant.

23287
B 28

9
LAW OFFICES
C. C. FITZGERALD
BALTIMORE, MD.

At 15 Aug 1925

MARION HUNTER

VS.

GEORGE HUNTER

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*
*
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*

IN
THE CIRCUIT COURT
OF
BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the Bill of Complaint filed in the above cause, respectfully says:

1. That he admits the allegations stated in paragraphs one of said bill of complaint as to the marriage of the parties.
2. That he denies all the other allegations stated in plaintiff's bill of complaint and demands strict proof thereof.

Your defendant havinf fully answered prays to be hence dismissed with his proper costs.

And as in duty bound, etc.

George E. Hunter

W. B. [Signature]
Attorney for Defendant.

1
CIRCUIT COURT

B 3
1922 No. Docket

MARION HUNTER

VS.

GEORGE HUNTER

Recorded

Folio 341 1925

Decree of Divorce

B No. 23287

(10)

Ed. 9th December 1925

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

Ward B. Cox
Auditor and Master.

Circuit Court

OF

BALTIMORE CITY

MARION HUNTER

VS.

GEORGE HUNTER

Term, 192...

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

✓ It is thereupon, this 9th day of December, A. D. 1925

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said

----- Marion Hunter -----

the above named Complainant be and s he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, the said George Hunter.

AND IT IS FURTHER ORDERED that said complainant be and she is hereby authorized to resume her maiden name, --Marion Clarke.

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

James P. Gorter