

IN THE CIRCUIT COURT

OF  
BALTIMORE CITY.

Edward Jackson

*603*  
*1970*

vs.

Alice Jackson.

Bill for divorce  
a vinculo matrimonii.

Mr. Clerk,  
Please file.

*Davis & Bishop*

Solicitors for Complainant

*B 21629*  
*411*

DAVIS & BISHOP  
ATTORNEYS AT LAW  
118 E. LEXINGTON STREET  
BALTIMORE, MD.

*fd 1 "October 1970"*

Edward Jackson

In The Circuit Court

Vs.

of

Alice Jackson

Baltimore City.

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To The Honorable, The Judge of Said Court:

Your Orator, complaining, respectfully says:

FIRST, That the parties hereto were married on or about May 29th. 1915 in Baltimore City, state of Maryland, by a Rev. James Bosley a Baptist minister and lived together as man and wife until on or about August 22nd. 1917.

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 towards his wife has always been kind, affectionate, and above reproach, the respondent without any just cause or reason abandoned and deserted your Orator. That the said abandonment and desertion has continued uninterruptedly for more than three years prior to the filing of this bill of complaint; and she has de-

clared her intention not to live with him any longer, *and that the separation of the parties is beyond any reasonable hope of reconciliation.*

FOURTH, That your Orator has never condoned said offense of desertion and abandonment.

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

WHEREFORE 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.

c-c May it please Your Honor to grant unto Your Orator a writ of subpoena, directed unto the said respondent, commanding her to be ~~off~~ to appear in this Court on some day certain to be herein named and to perform such decree as may be passed in the premises.

As in duty bound etc.

*Edward Jackson*  
-----  
Complainant.

*Davis + Bishop*  
-----  
Solicitors For Complainant.

327

603

Ct. Ct.

192

Docket No.

Jackson  
v

Jackson

926 1/2 4th St  
Canton

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B21629

<2>

Filed

11 Oct

192

SOLICITOR

Davis Bishop

Summonsed, and a copy of the Process  
left with the defendant.  
Bregan } Thomas H. McCully.  
(10/17/20.3 } Sheriff  
Fees \$0.80

EQUITY SUBPOENA

The State of Maryland

To

*Alice Jackson*

of Baltimore City, 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 *October* 1920, to answer the complaint of

*Edward Jackson*

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 *13<sup>th</sup>* day of *Sept* 1920

Issued the *1<sup>st</sup>* day of *October* in the year 1920

*Chas. R. Whiteford* Clerk.

Notice to the person summoned:

"Personal attendance in Court on the day named in the above writ is not required; but unless within fifteen (15) days after the return day, legal defense is made in the above mentioned suit a Judgment by default may be entered against you."



IN THE *B 603*  
CIRCUIT COURT *1920*  
OF BALTIMORE CITY

EDWARD JACKSON

VS.

ALICE JACKSON.

*B 21679*

Answer *(3)*

Mr. Clerk:

Please file, etc.

*R. M. Winterling*  
Solicitor for Respondent.

*R. M. Winterling*  
~~GEORGE A. SOLIER~~  
ATTORNEY AT LAW  
SIXTH FLOOR  
MARYLAND CASUALTY TOWER  
BALTIMORE AND NORTH STS.  
BALTIMORE

*Oct 26 Oct 1920*

EDWARD JACKSON  
VS.  
ALICE JACKSON

\*  
\*  
\*  
\*  
\*

IN THE  
CIRCUIT COURT  
OF BALTIMORE CITY.

To the Honorable, the Judge of said Court:

The answer of Alice Jackson, the respondent, to the Bill of Complaint filed against her in this Court exhibited:- this respondent answering says:

That she neither admits or denies the allegations set forth in said Bill of Complaint, but demands strict proof thereof.

And having answered said Bill of Complaint, in so far as she is advised it is material so to do, this respondent prays to be hence dismissed with her reasonable cost.

R. M. Winters  
Solicitor for Respondent.

STATE OF MARYLAND, CITY OF BALTIMORE, TO WIT:

I HEREBY CERTIFY that on this 26<sup>th</sup> day of October in the year nineteen hundred and twenty, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared Alice Jackson and made oath in due form of Law that the matters and facts set forth in the above answer are true to the best of her knowledge, information and belief.

Rudolph M. Winters  
Notary Public.

Circuit Court

603

1920

Docket.....

Edward Jackson

vs.

Alice Jackson

Petition for leave to take  
Testimony and Order of  
Court thereon

Case 3 21629  
No. ....

(4)

Filed 4 Nov 1920

Edward Jackson

vs.

Alice Jackson

IN THE

Circuit Court

OF

BALTIMORE CITY

To the Honorable the Judge of the  
Circuit Court of Baltimore City:

THE PETITION OF Edward Jackson

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

*[Signature]*  
Solicitor for Plaintiff

ORDERED, this 4<sup>th</sup> day of November 1920, 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.

*[Signature]*  
Robert F. [Name]



7/12/14/6

Docket B. 603/1920

IN THE CIRCUIT COURT

Edward Jackson

vs

Alice Jackson

**DEPOSITIONS**

10 No. 21629

**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 17 day of Dec 1920

Edward Jackson

vs.

Alice Jackson

In the Circuit Court

OF BALTIMORE CITY

The above entitled cause being at issue,

and notice having been given me by the Solicitor for the Plaintiff  
of a desire to take testimony in the same, I, ALFRED J. CARR, one of the  
Standing Examiners of the Circuit Court of Baltimore City, under and by virtue  
of an order of the above named Circuit Court, passed in said cause on the  
4th day of November 1920, met on  
the 5th day of November in the year nineteen  
hundred and twenty at my office, in the City of Baltimore, in the State  
of Maryland, and assigned the 11th day of November  
in the same year at 10.30 o'clock in the fore 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 Solicitors of the  
respective parties to take the following deposition, that  
is to say:—

EDWARD JACKSON, the Plaintiff produced in his own behalf,  
being duly sworn, deposeseth and saith as follows:

BY THE EXAMINER:

1Q. State your name, residence and occupation.

A- Edward Jackson, 3618 Dillon Street, Baltimore, and I am  
a Laborer.

2Q. Who are the parties to this suit?

A- I am the Plaintiff, and Alice Jackson is my wife.

BY MR. DAVIS:

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

A- On May 29th, 1915, at 1834 Ashland Avenue, Baltimore City,  
by the Reverend James Bosely, a Baptist Minister.

4Q. Where did you and your wife first go to live after the  
marriage as husband and wife?

A- We first lived at 922 S. Fourth Street, Canton, Baltimore.

5Q. Have you or not been a resident of the City of Baltimore,  
State of Maryland, formore than two years prior to October 1st,  
1930?

A- Yes, sixteen years.

6Q. Does or not your wife live in Baltimore City now?

A- Yes, she lives in Baltimore City.

7Q. Has she or not been a resident of the City of Baltimore,  
State of Maryland, for more than two years prior to October  
1st, 1930?

A- Yes, she has been here six years, to my knowledge.

Edward Jackson

8Q. Were any children born of this marriage?

A- No.

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

A- No.

10Q. When did you separate, and which one left the other?

A- We separated August 22nd, 1917, and my wife left me.

11Q. What was your treatment and conduct towards your wife during the whole of your married life?

A- I took care of her. I supported her. I was as kind as I could be. I was true to her, and faithful.

12Q. What cause, if any, did you give your wife to induce her to abandon you on August 22nd, 1917?

A- The trouble occurred between my wife. The reason why she left me was on account I would not take care of the boys, step-children, by her previous marriage.

13Q. Where did she go to, if you know?

A- It was on North Eutaw Street, Baltimore, that she went to. She took the children with her and left.

14Q. What, if anything, did she say when she left?

A- She said she did not want me any more. She said she would never return, and did not want me any more.

15Q. Since your wife abandoned you as you have described it, on August 22nd, 1917, have you lived with or cohabited with her?

A- No.



Edward Jackson

16Q. Has she in any way sought to be reconciled and return to you?

A- No. She had me arrested at the Eastern Police Station and at the hearing, the Magistrate dismissed me.

17Q. Has the abandonment of you by your wife continued uninterruptedly for at least three years prior to October 1st, 1920?

A- Yes, three years this last August.

18Q. Was or not her abandonment of you her own deliberate and final act?

A- Yes, her own act. She said she would not live with me any more.

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

A- No. None.

CROSS\*EXAMINATION BY MR. WINTERLING:

1XQ. You have no children by this marriage?

A- No.

2XQ. And the only other children are by her previous marriage?

A- Yes.

3XQ. And they are all of age?

A- Yes, all of age.

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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*  
*Edward J. Jackson*

MARIA REDD, a witness produced on behalf of the Plaintiff, being duly sworn, deposes and saith as follows:

BY THE EXAMINER:

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

A- Mrs. Maria Redd, 921 S. Second Street, Baltimore, and I am a Housewife.

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

A- Yes, I have known them both for twelve years.

BY MR. DAVIS:

3Q. Are they or not man and wife, and if you say they are, tell me how you know it.

A- I did ~~not~~ see them get married, they were married by our Paster. I was not there.

4Q. Did they or not live together as man and wife, and was it or not their reputation among their friends and relatives and acquaintances that they were married people?

A- Yes, they lived together as man and wife, and that was their reputation.

5Q. Whilst they lived together as man and wife, did you visit them?

A- Yes, I did.

6Q. From your observations, what was the treatment of Mr. Jackson towards his wife?

A- He was good, kind and faithful to her, and provided for her well, and gave her a good home.



Maria Redd

7Q. How did she treat him?

A- I thought she treated him like he was treating her. There was nothing between the two parties, until she left him.

8Q. Are they now living together?

A- No.

9Q. When did they separate and which one left the other?

A- They separated August 23rd, 1917, and she left him.

10Q. Why did she leave him, if you know?

A- On account of her sons.. She said he would not support her sons, and she wanted him to support her children by her previous husband.

11Q. How old are these children?

A- I could not tell how old they were, but they were young men. Grown, and able to work.

12Q. Were these children or not perfectly able to work and provide for themselves?

A- Well and hearty strong able men.

13Q. The trouble then was, that she wanted him to support her grown children by the previous husband?

A- Yes, that is the only thing she told me.

14Q. How do you know this?

A- She told me so.

15Q. Since she left ~~xxx~~ him, have you seen her or had any conversation with her?



Maria Redd

A- Yes, I had a conversation with her two years ago, about Mr. Jackson.

16Q. What did she say?

A- She told me she would never live with him again, when she left, she went from him not to return.

17Q. Have they lived together or cohabited together since August 22nd, 1917, to your knowledge?

A- No, they have not.

18Q. Have these parties to your knowledge, both been residents of the City of Baltimore, State of Maryland, for more than two years prior to October 1st, 1920?

A- Yes, they have lived in Baltimore since I have known them, twelve years.

19Q. Has the abandonment of Mr. Jackson by his wife continued uninterruptedly for at least three years prior to October 1st, 1920?

A- Yes, over three years.

20Q. Was her abandonment of him her own deliberate and final act?

A- Yes, it was. She told me she left, herself. It was her own act. And she would never return any more, she told me.

21Q. In your opinion, is there any reasonable hope or expectation of a reconciliation?

A- No.

22Q. Were any children born of their marriage?

A- No. (Mr. Winterling - no questions) - - - - -

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*

*Maria Redd.*

MARY E. GILES, a witness produced on behalf of the Plaintiff, being duly sworn, deposes and saith as follows:

BY THE EXAMINER:

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

A- Mrs. Mary E. Giles, 414 N. Bond Street, Baltimore, and I do Domestic Work.

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

A- Yes, I have known them for sixteen years.

BY MR. DAVIS:

3Q. Are they or not man and wife, and if you say they are, tell me how you know it.

A- We all are members of the same church and our Pastor married them, and they lived together as man and wife.

4Q. Were any children born of their marriage?

A- No.

5Q. Did you visit them when they were living together, after being married?

A- Yes, I used to go there, and also my husband.

6Q. From what you saw, when you visited them, how did Mr. Jackson treat his wife?

A- Lovely.

7Q. How did Mrs. Jackson treat her husband?

A- She treated him nice then, as far as I could see.

8Q. Are they now living together?

A- No.

Mary E. Giles

9Q. When did they separate and which one left the other?

A- She left, in August, 1917.

10Q. What caused the separation, if you know?

A- , From what I know, her and I used to live next door to each other, in Canton, and I said to her one day, I was joking with her, I said "there goes your husband passing the door, 'old coals will sometimes be rekindled'", and she said "No, I will never live with him any more. I moved out, and took out everything, and will not live with him any more. We were then living on Hudson Street.

11Q. How long ago was that?

A- One year ago, on Hudson Street.

12Q. Who lived with her?

A- Her and her three sons.

13Q. How old are these three children?

A- Grown. They are men. Grown.

14Q. Did she ever tell you why she left her husband?

A- She said if he would not take care of her and her children, she did not want him.

15Q. Do I understand you then, to testify that she left him because ~~xxx~~ he would not support her grown children by her previous husband?

A- That is what she told me.



Mary E. Giles

16Q. Has the abandonment of Mr. Jackson by his wife continued uninterruptedly for at least three years prior to October 1st, 1930?

A- Yes, three years last August.

17Q. Was or not her abandonment of him her own deliberate and final act?

A- Yes, her own act.

18Q. In your opinion, is there any reasonable hope or expectation of a reconciliation?

A- No. She said she would never live with him again.

(Mr. Winterling - no questions)


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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* Mary E. Giles

No other witnesses being named or produced before me, I then at the request of the solicitors of the respective parties closed the depositions taken in said cause, and now return them closed under my hand and seal, on this 17th day of December 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.

Sent to Mr. Coe,

603

Circuit Court

19 20

Docket No. \_\_\_\_\_

Jackson<sup>3</sup>  
vs.  
Jackson

SUBMISSION FOR DECREE.

Mr. Clerk,  
Please file,

*Coe*

Solicitor for Plaintiff.

B 21629  
No. \_\_\_\_\_

Filed *1 Jan* 19*21*

In the Circuit Court  
of Baltimore City



*Edward Jackson*

vs.

*Alice Jackson*

*In the Circuit Court  
of Baltimore City*

*September*

TERM 19 *20*

To the Honorable

Judge of Said Court:

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

*[Signature]*

Solicitor for Plaintiff,

*R. M. Wintersburg*

Solicitor for Defendant.

Circuit Court

603

19 20

Docket No. ....

Jackson

vs.

Jackson

Order of Reference  
and Report

8 21629

No. ....

7

Order Filed 10 day of Jan 21 19

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

Edward Jackson

vs.

Alice Jackson

B 622  
1920

IN THE

Circuit Court

OF

BALTIMORE CITY

January

Term 1921

10

This case being submitted, without argument, it is ordered by the Court, this day of January, 1921, 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.

Ward B. Coe

Report of Auditor and Master

matrimonii

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

Defendant summoned and answers by solicitor.

Residence of both parties 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.

Fee \$9 paid.

January 11th, 1921.

50  
CIRCUIT COURT

B-603-

1920.

No. 60 Docket

EDWARD JACKSON

VS.

ALICE JACKSON.

**Decree of Divorce**

B 21629

B No. ....

8  
Recorded

Folio 50 1921

Ad 14 February 1921

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

Ward B. Cox  
Auditor and Master.



Decree of Divorce

IN THE

**Circuit Court**

OF

BALTIMORE CITY

EDWARD JACKSON

VS.

ALICE JACKSON

*Jan*

Term, 1921.

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

It is thereupon, this *15th* day of *February*, A. D. 1921,

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

the above named Complainant be and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, the said Alice Jackson.

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

*Charles H. Hester*