

In The
Circuit Court
of
Baltimore City.

62 of 635
1922

John A. Baker

vs.

Lottie Baker

Bill of Complaint.

Mr. Clerk:
Please file,
issue, etc.

Chapin A. Ferguson

Sol. for Complainant.

B 24510

11

CHAPIN A. FERGUSON
ATTORNEY AT LAW
215 COURT AND STREET
BALTIMORE, MD.
Ad 2 Nov 1922

John A. Baker

vs.

Lottie Baker

:
:
:
:
:

In The
Circuit Court of
Baltimore City.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator Complaining Says:

1. That he and the defendant were married on or about the 14th day of January, 1900, at Baltimore City, Maryland, by a religious ceremony.

2. That both he and the defendant 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.

3. That although your Orator has always been to the defendant a good, true and dutiful husband, she abandoned and deserted him in the month of April, 1913, without cause or provocation. That the separation of the parties has continued uninterruptedly for more than three years prior to the filing of this bill of complaint, is deliberate and final and beyond any hope of reconciliation.

To The End Therefore:

(a) That he may be divorced A Vinculo Matrimonii from the defendant.

(b) That he may have such other and further relief as his case may require.

May it please your Honor to grant unto your Orator the writ of subpoena directed to the said defendant, Lottie Baker, residing at Baltimore, State of Maryland, commanding her to be and appear in this Court on some certain day, to be named in said writ, and show cause, if any she may have, why a decree ought not be granted as prayed.

And as in duty bound, etc.

Chapin A. Ferguson

Solicitor for Complainant.

635-1362

Ct. Ct.

1922

Docket No.

Baker

False

680 Josephine St

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B 24510

(2)

Filed 13 Nov 1922

W. H. Ferguson SOLICITOR

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

Thomas J. McPulty Sheriff

(Ring) 11/4/22 Fee \$0.80

EQUITY SUBPOENA

The State of Maryland

To

Lottie Baker *SP 11/4/22* *(mmy)*

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

John A. Baker

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 JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the **11th** day of **September** **1922**

Issued the *B* day of **November**, in the year 1922

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.)

In The Court
of 3635
Baltimore 1922

John Baker

vs

Ruthie Baker

Answer to bill of
Complaint

Mr Clerk please
file

[Signature]

B 24510
(3)

DAVIS & BISHOP
ATTORNEYS AT LAW
BANNER BUILDING
14 E. PLEASANT STREET
BALTIMORE, MD.
[Signature] 1922

John Baker
Vs.
Lottie Baker

In The Circuit Court
of
Baltimore City

To The Honorable, The Judge of said Court
Your Respondent answering the petition of the Complainant in
the above case exhibited respectfully says:

1. The Respondent admits the allegations as contained in the
first paragraph of the Bill of Complaint.

2. The Respondent denies that she deserted the Complainant.

3. The Respondent denies that she is responsible for the sep-
aration of the parties .

4. There is a minor child, Randolph Baker, born as a result of
the marriage as between the parties to this suit, which child
is now in custody of the Complainant.

5. The respondent is without funds and is unable to provide
the funds necessary for the defense of this action; and she is
advised by counsel that she is entitled to petition This Hon-
orable Court for an allowance of a sum certain as alimony and
a reasonable amount to compensate her solicitor. The Complain-
ant is employed as a janitor in an apartment house and his wages
amount to \$30 weekly.

Wherefore Your Orator Prays

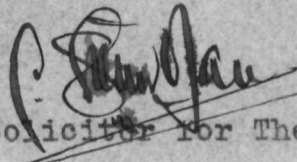
Alimony Pendente Lite.

Counsel Fee

Care and Custody of Randolph Baker

Dismissal of The Bill of Complaint.

As in Duty Bound etc.


Solicitor for The Complainant

Serve on
Chapin A. Ferguson

B62 Docket 635
1922

Circuit Court

Baker

vs.

Baker

Order Counsel Fee and Alimony

Pendente Lite

No. 24-5-10

\$30 (4) (5)
14 Jan 1923

15 Nov 1922
6 1923
14 Jan 1923

Now Est
(2nd Return)

Thomas J. McMultry
Sheriff

Now Est
Thomas J. McMultry
Sheriff

50
Copy of the within Order of Court served on
Chapin A. Ferguson, Solicitor on the 17th day
of January 1923 in presence of Harry B. Frank
Thomas J. McMultry
Sheriff
Fees \$0.50

John A Baker

vs.

Lottie Baker

-IN THE-
CIRCUIT COURT

-OF-

BALTIMORE CITY

Nov TERM

ORDERED BY THE COURT this 15 day of November 19 22

that the Plaintiff John A Baker

pay to the Defendant Lottie Baker

the sum of Thirty 00 Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of Twelve 00

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

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

day of November 19 22, provided a copy of this Order be served on the said Plaintiff

John A. Baker on or before the 24

day of November 19 22

Cassell J. Bond

TRUE COPY-TEST:

CLERK

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City

this 11 day of January 1923, that the time for showing cause

under said Order be extended to the 26 day of January 1923,

and the time for service of a copy of the same be extended to the 20 day of

January 1923.

Kenneth Duff

reserved upon the Plaintiff or his Solicitor of Plea

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this 6 day of December 1922, that the time for showing cause under said Order be extended to the 21 day of December 1922, and the time for service of a copy of the same be extended to the 16 day of December 1922.

Carroll J. Bond

In The
Circuit Court
of
Baltimore City

B 635
John A. Baker

1942
vs.

Lottie Baker

Answer to Petition and
Order for Counsel Fee
and Alimony

Mr. Clerk:
Please file,

Chapin A. Ferguson

Sol. for Respondent.

B 24510

CHAPIN A. FERGUSON

ATTORNEY AT LAW

APR 1943
213 COURTLAND STREET
BALTIMORE, MD

John A. Baker

vs.

Lottie Baker

:
:
:
:
:
:
:

In The
Circuit Court of
Baltimore City.

To The Honorable, The Judge of Said Court:

The answer of the respondent to the petition and order nisi filed and passed, respectively, on the 15th day of November, 1922, respectfully shows:

That he is employed at a salary of \$15.00 per week and that he has in his custody a child of the parties hereto, who is 14 years of age and whom he is compelled to support out of his earnings. That he is therefore unable to pay a Counsel fee of Thirty Dollars or to pay the sum of Twelve Dollars per week alimony pendente lite.

Your Respondent therefore prays this Court to dismiss said petition, and that the order nisi of November 15th, 1922, be rescinded and set aside.

John A. Baker
Respondent

Chapman A. Ferguson
Solicitor for Respondent.

State of Maryland, City of Baltimore, to wit:

This is to certify that on this 25th day of January, 1923, before the subscriber, a Notary Public of the State of Maryland, in and for Baltimore City, personally appeared John A. Baker, and made oath in due form of law that the matters and facts set forth in the foregoing answer are true to the best of his knowledge information and belief.

C. Miltensickerson
Notary Public.

C. A. Ferguson

Serve on

J.S. Davis

J. S. Davis

80

CIRCUIT COURT

635
1923

Docket No. 62

John A Baker
VS.

Lottie Baker

**PETITION AND ORDER TO
TAKE TESTIMONY UN-
DER 30th RULE**

B
No. *24510*

8

Fd *27 Jan* 19 *23*

*Copy of the within Petition and Order of Court
served in J.S. Davis Solicitor on the 2nd
day of February 1923 in presence of Harry B. Brant
Thomas F. Murphy
Sheriff
Fees \$0.50*

John A. Baker
VS.
Lottie Baker

IN THE
Circuit Court
OF
BALTIMORE CITY

To the Honorable the Judge of the
Circuit Court 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 therefor prays your Honor to pass an order, according to the Statutes for such case made and provided.

And as in duty bound will ever pray.

Chapman Ferguson
Solicitor for Plaintiff.

Upon the foregoing Petition and Application it is this 27th day of January
A. D., 1923, Ordered that the petitioner have leave to take testimony as prayed and that the
testimony to be offered be taken as required by the 30th Rule of this Court. And it is further Ordered
that a copy of this petition and order be served on the Defendant or her
Solicitor, on or before the 10 day of February 1923
Henry Duggan

CIRCUIT COURT

635 B62
19 22 Docket No.

John C. Baker
vs.

John Baker

ORDER OF APPEARANCE

Mr. Clerk

Please File

Louis S. Hagg, Jr.
Sol. for Defendant

B 24510
No. (19)

Filed 1 day of July 19 22

John A. Baker

.....

.....

Lothe Baker ^{vs.}

.....

.....

IN THE
Circuit Court
OF
BALTIMORE CITY

..... *Term, 19*

Mr. WHITEFORD, Clerk.

Enter my appearance for Defendant

Lewis S. Stagg, Jr.

.....

Solicitor

W.A. Ferguson

635
192 2 No. Ct. Ct.
Docket

John A. Baker

vs.

Lothe Baker

MOTION FOR HEARING

B 24510

No.

(10)

Filed *1* day of *July* 192 *3*

J.S. Davis
Lewis S. Glegg Jr

IN THE

CIRCUIT COURT

OF

DALLAS COUNTY

in conformity with the first printing rule

Notice for

John A. Baker

VS.

John Baker

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The *defendant* by *Lewis S. Plagg* and *J. S. Davis*

Solicitor, applies to have the above entitled cause placed on the Trial Calendar

for hearing *on alimony and counsel fee*

in conformity with the First Equity Rule.

Lewis S. Plagg
Solicitor for *Defendant*

Serve on
C.A. Ferguson
J.S. Davis

635
B-~~24570~~
192 2 No. Ct. Ct. Docket

BAKER

vs.

BAKER

NOTICE OF HEARING

B No. 24570
11

No.

Filed 2 day of Feb 1923

Copies of the within Notice served on J.S. Davis
and C.A. Ferguson - Adalberto on the
5th day of February 1923 in presence of
Harry B Franz Thomas F McQuilty
Sheriff
Fees \$1.00

JOHN A BAKER

VS

LOTTIE BAKER

IN THE

CIRCUIT COURT

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 ALIMONY AND COUNSEL FEE

when reached in due course on said calendar.

CHARLES R. WHITEFORD.

Clerk Circuit Court.

Circuit Court

635
19 21 B No. Docket.

Jama Baker
us.
Lottie Baker

Final Order, Counsel Fee and Alimony
Pendente Lite.

B24510
No. B.

12

Filed 12 July 19 23

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

John A Baker
vs.

Lottie Baker

Jan Term, 1923

This cause coming on to be heard upon the petition for Alimony *pendente lite* and Counsel fee, and the answer thereto, and testimony taken, and having been submitted by the solicitors for the respective parties;

ORDERED by the Circuit Court of Baltimore City this 12th day of February 1923, that the Complainant pay to the Defendant the sum of Twenty-five Dollars, as counsel fee for the Solicitor of the Defendant and that he further pay the sum of Three Dollars per week, to the said Defendant as Alimony *pendente lite* accounting from the 12th day of February 1923 and continuing until the day of 19, (should this suit be so long pending) or until the further order of this Court.

Payable through
the Prisoner Aid Association

Kenny Duffy

CIRCUIT COURT

635
1922

B Docket No. 62

John A. Baker
vs.

Lottie Baker

Order

19

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

~~Sally~~
No. B 24510

< 13 >

Fd. 19 Feb 1923

Circuit Court
BALTIMORE CITY

John A. Baker
US.
Lottie Baker

IN THE
Circuit Court
OF
BALTIMORE CITY

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

THE PETITION OF *John A. Baker*
the Complainant

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.

Chapman Ferguson
Solicitor for *Complainant*

ORDERED, this _____ day of *February* 1923, 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 *January 27th* 1923 *be and the same is hereby rescinded and set aside.*

Henry Duffey

3/12/14/95

Doc. B 635
1922

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

John A. Baker

vs.

Lottie Baker

No. 24510 B

PLAINTIFF'S COSTS

Examiners.....	\$ 5 ⁰⁰
Copies.....	
Sheriff.....	
Stenographer.....	3 ⁰⁰
	\$ <u>11⁰⁰</u>

DEFENDANT'S COSTS

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

Ad 25 April 1923

John A. Baker

vs.

Lottie Baker

In the Circuit Court

OF BALTIMORE CITY.

The above 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, 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
nineteenth day of February 1923, met on
the twenty-eighth day of February in the year nineteen
hundred and twenty-three at my office, in the City of Baltimore, in the State
of Maryland, and assigned the first day of March
in the same year at three-thirty o'clock in the afternoon and the
office of Chapin A. Ferguson, 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:—

8-3

Baker,

v:

Baker.

Testimony taken at the office of C. A. Ferguson Esq., St. Paul Street, Baltimore, Maryland, March 1st., 1923, at 3.30 O'clock P. M.

John A. Baker, 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. John A. Baker, 2121 Oak Street; janitor.
- 2 Q. Do you know the parties to this suit?
- A. I am the Plaintiff and my wife is the Defendant.

BY Mr. Ferguson:

- 1 Q. When were you married?
- A. 1900.
- 2 Q. 14th., January 1900?
- A. Yes; about that time.
- 3 Q. Were you married in Baltimore, Maryland?
- A. Yes.
- 4 Q. By a Religious Ceremony?
- A. Yes.
- 5 Q. Are you and your wife residents of Baltimore City, State of Maryland, and have you been for more than two years prior to the filing of this suit?

John A. Baker.

A. Yes.

6 Q. Are you and your ~~wife~~ ^{husband} living together now?

A. No sir.

7 Q. When did you separate

A. 1913.

8 Q. What month?

A. April 1913.

9 Q. Did You leave her or did she leave you?

A. She left me.

10 Q. How did the separation take place?

A. When I came out of the Hospital---

Counsel interrupting: How long had you been in the Hospital.

Witness: Four months.

11 Q. And when you came out of the Hospital it was in April 1913.

A. Yes.

13 Q. What did you do?

A. I went home, and tried to stay home, but she has another man there. She said that she had somebody there to pay the rent, and that I should go and look out for myself and not come back there.

14 Q. She said that she had a man there and that he paid the rent for her.

A. Yes.

John A. Baker.

15 Q. Did you try to stay there.

A. I certainly did try to stay home with her.

16 Q. And did she make you get out?

A. Yes; she made me get out. There was 'nt any room there for me, she said.

17 Q. Did you try to go back after that?

A. Yes.

18 Q. I understand she had you arrested for the support of the children.

A. Yes.

18 Q. And what did she say at the station house.

A. She told the squire that she could take care of them; she wanted them all.

19 Q. What did the 'Squire ask you about going back with her?

A. He told me to go home and stay home if I could, and, of course, if I could not, to go away.

20 Q. And what did she say at that time?

A. She said that she had another man, and that she did not want me any more.

21 Q. She said thá she had another man and that she did not want you any more.

A. Yes.

22 Q. Did she say that this other man was supporting her?

John A. Baker.

A. Yes.

23 Q. And you made two efforts to go home?

A. Yes; I really did; I really wanted to stay home with my family.

24 Q. But she would not hear of it?

A. She would not hear of it. That is the truth if the truth was ever told.

25 Q. And that was April 1913?

A. Yes.

26 Q. Have you lived together since that time?

A. No sir.

27 Q. I understand that you had just come out of the Hospital?

A. Yes.

28 Q. How long did she live with this man afterwards; do you know?

A. Well, three or four years. Yes; it was three or four years or more.

29 Q. And she positively refused to live with you?

A. Yes.

30 Q. She refused to live with you?

A. Yes.

31 Q. When you came out of the Hospital?

A. Yes.

John A. Baker.

32 Q. ^m Have you ever lived or cohabied together since April 1913?

A. No sir.

33 Q. Has the separation continued uninterruptedly for more than three years prior to the filing of this suit?

A. Yes.

34 Q. Is it deliberate and final; is there any hope of your getting together again?

A. No sir.

35 Q. There is no hope of a reconciliation?

A. No sir. She says that she does not want me, and I dont think there is any hope of our going together.

36 Q. Did she tell you and the Magistrate that she did not want you?

A. She surely did.

37 Q. That was iⁿ 1913?

A. Yes.

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.---

James W. Baker

George Leech, 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. George Leech, 1006 McCulloch Street; hard laboring work.

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

A Yes

By Mr. Ferguson:

1 Q. How long have you known the parties to this suit?

A. Well, twelve or thirteen years or more.

2 Q. Did you know them while living together as husband and wife?

A. Yes.,

3 Q. Were they married and did they live together at one time as husband and wife?

A. Yes.

4 Q. And did they hold themselves out to their friends and acquaintances as husband and wife?

A. Yes.

5 Q. Are they both residents of Baltimore City, State of Maryland, and have they resided here for more than two years prior to the filing of this suit?

George Leech.

A. Yes.

6 Q. It has been for more than two years?

A. Yes.

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

A. No sir.

8 Q. Do you know when they separated?

A. Well, it has been so long ago that I do not know exactly the year.

9 Q. He says April 1913; is that about correct?

A. Yes; it was some where in there; yes.

10 Q. Did he leave her or did she leave him?

A. No; she left him; she moved out of Carrolltown, which is in Southwest Baltimore; that is where they were house keeping, and when he came out of the Hospital she had moved.

11 Q. Did he make any effort to go back to live with her?

A. Yes.

12 Q. And you know that as a matter of fact he went back?

A. Yes; he went to his home.

13 Q. Where was she living?

A. On Green street, but I do not know the number.

George Leech.

14 Q. Do you know the number.

A. No sir.

15 Q. Do you know who shewas living with?

A. I do not know the name. I know the man that shewas running with, but I did not know the man that shewas living with.

16 Q. Was she living with the man that shewas running with.

A. Shewas living with this same man that she is running with not, I suppose, but I do not know.

17 Q. But however, you know that he went back to live with her in the home?

A. Yes.

18 Q. And she would not let him come back.

A. No sir.

19 Q. Hav e they lived ~~to~~ or cohabited together since April 1913?

A. No sir; they have not.

20 Q. Has this abandonment and separation continued uninterruptedly for more than three years prior to the filing of this suit?

A. Yes.

21 Q. Do you think it is deliberate and final, and is there any hope of them living together again?

George Leech.

A. No sir; I dont think so.

22 Q. You dont think that they will ever 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 answers.

A.---

No

Geo *his*
x *Sub*
over

Geo
W. H. M. [unclear]

James Johnson, 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. James Johnson, 1044 Argyle Avenue; I am not doing anything just now.

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

A. Yes.

By Mr. Ferguson:

1 Q. How long have you known the parties to this suit?

A. About twelve or thirteen years.

2 Q. Were they living together when you knew them?

A. Yes.

3 Q. They were married, were they, and they did live together as husband and wife?

A. Yes.

4 Q. Are they both residents of Baltimore City, State of Maryland, and have they been for more than two years prior to the filing of this suit?

A. Yes.

5 Q. Are they living together now?

James Johnson.

- A. No sir.
- 6 Q. Do you know when they separated?
- A. Well, not exactly; it was about April 1913.
- 7 Q. Now, did she leave him or did he leave her?
- A. She left him.
- 8 Q. Where was he at the time of the separation?
- A. He was in the Hospital.
- 9 Q. How long was he in the Hospital.
- A. About three or four months.
- 10 Q. When he came out of the hospital, where was she living?
- A. On Green Street.
- 11 Q. And she moved from where they were while he was in the Hospital.
- A. Yes.
- 12 Q. With whom was she living on Green Street.
- A. They were all in the house together.
- 13 Q. Was she living in a house with a man?
- A. Yes. The man was there; I do not know whether he was a boarder there or not, but he was there.
- 14 Q. Did he go back to that house after he came out of the Hospital?
- A. Yes.
- 15 Q. Did he succeed in staying there.

James Johnson.

A. Because she would not allow him there.

16 Q. Did he attempt to go back on more than one occasion?

A. He went back on several occasions, because each time he went back, - each time he went back there she turned him out and he would come back and tell us about it.

17 Q. She would not let him live there?

A. No.

19 Q. And you know as a matter of fact that she was living there with a man?

A. Yes.

20 Q. What was his name?

A. Johnson.

21 Q. And you say that he went back there several times and she would not let him stay there?

A. Yes.

22 Q. Have they lived together as husband and wife since the separation in April 1913?

A. No sir.

23 Q. Has this separation continued uninterruptedly for more than three years prior to the filing of this suit?

A. Yes.

James Johnson.

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

A. Yes.

25 Q. Is there any hope of their going back together again?

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.---

Ho
James Johnson

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 29th day of April 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 two Exhibits with these depositions, to wit:

Plaintiff's 1 Exhibit

Defendant's 1 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.

635
19 22

Circuit Court

Docket No. 62 B

John A. Baker

vs.

Lottie Baker

SUBMISSION FOR DECREE.

Mr. Clerk,
Please file,

Chapin A. Ferguson
Solicitor for Plaintiff.

B 24510

No. 15

Filed 25 June 19 23

John A. Baker

vs.

Lottie Baker

*In the Circuit Court
of Baltimore City*

March

TERM 19 23

To the Honorable

Judge of Said Court:

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

Chapin A. Ferguson

Solicitor for Plaintiff,

Wm. J. ...

Solicitor for Defendant.

v. s. v. s.

635 Circuit Court

19 22 Docket No.

Baker

vs.
Baker

Order of Reference
and Report

Robertson

24510

No.

16 ✓

Order Filed *25* day of *April* 19 *23*

Report Filed day of 19

John A. Baker
vs.
Lottie Baker

IN THE
Circuit Court

OF
BALTIMORE CITY

March

Term, 19 23
25th

This case being submitted, without argument, it is ordered by the Court, this
day of April, 1923, that the same be and it is hereby referred to
Alex H. Robertson, Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.

Henry Duffey

Report of Auditor and Master

Bill filed by husband against wife for a divorce a vinculo matrimonii
for abandonment for three years, Code Art. 16, Sec. 36.

Defendant summoned and answers.

Proof shows marriage, residence and abandonment for three years, con-
tinuous, deliberate, final and without hope of reconciliation.

Case ready for decree.

Alex H. Robertson

Auditor and Master

CIRCUIT COURT

B 635
1922

No. 62 Docket

John A. Baker

VS.

Lottie Baker

Filed 100 1923

Decree of Divorce

B 24510

B No. 17

At 28 June 1923

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

Alex. Robertson
Auditor and Master.

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

..... John A. Baker

VS.

..... Lottie Baker

March Term, 19*23*

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

It is thereupon, this *28* day of *April*, A. D. 1923. by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said -----
----- John A. Baker -----
the above named Complainant be and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, the said Lottie Baker.

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

Mary Duffy