IN THE GIRCUIT COUBT OF BALTIMORE GITY.

WilburiJohnson

VS.

Selina Johnson.

Bill for Divorce

A Vinculo Matrimonii.

Mr. Clerk,

Please file, etc.

Wilbur Johnson,(

VS.

Selina Johnson (

IN THE CIRCUIT COURT OF BALTIMORE CITY.

To the Honorable, the Judge of said Court:
Your Orator, complaining respectfully says:

FIRST.

That the parties hereto were married in Govans, Baltimore County, Maryland, on or about January 10th 1908, and lived together as man and wife until on or about the 30th day of September 1914.

SECOND.

That your Orator, is a resident of the City of Baltimore, and of the State of Maryland, and has been for more than two years prior to the filing of this Bill of Complaint and that the defendant is is a resident of Baltimore County, and of the State aforesaid.

THIRD.

That the defendant has on divers days and times since the said marriage committed the crime of adultery, with divers lewd men whose names will be disclosed on the day of trial and that the said acts were committed without his procurement, connivance or consent and that he has not lived or co-habited with the defendant since he discovered the same.

FOURTH.

That the defendant has without any just cause or reason abandoned your Orator and has declared her intentions to live with him no more; that the abandonment was deliberate is final has continued uninter-rupted for more than three years prior to the filing of this Bill of Complaint, and that there is no reasonable hope or expectation of a reconciliation.

FIFTH.

That three children all of whome are yet minors have been born since the said marriage.

SIXTH.

That your Orator, has ever been a good, faithful, chaste, affectionate and true husband to the said defendant.

Wherefore your Orator prays:

lst. That a decree be passed divorcing your Orator, A VINCULO MATRIMONII, from the defendant.

2nd. The care and custody of the oldest child Mary Elizabeth Johnson.

3rd. Such other and further relief as the case may require.

May it please Your Honor to grant your Orator the writ of subpoena directed unto the said defendant commanding her to be and appear in this Court on some day certain to be therein named and perform such such decree as may be passed in the premises.

And as in duty bound he will ever pray.

Solicitor for complainant.

Sol Woodburn St Boets av Mel Docket No. SUBPOENA TO ANSWER BILL OF COMPLAINT

now Est. Fined J. M. Medy Janes J. M. Medy J. Markey Janes.

EQUITY SUBPOENA

The State of Maryland

Selma Johnson

Un

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 (1917), to answer the complaint of

against you in said Court exhibited.

HEREOF fail not, as you will answer the contrary at your peril:

Willow Johnson

WITNESS, the honorable MORRIS A. SOPER, Chip Judge of the Supreme Bench of

Baltimore City, the

day o

191

Issued the

day o

Stole in the year 191

Notice to the person summoned:

"Personal attendance in Court on the day named in the above writ is not required; but unless within such number of days thereafter as the law limits, legal defence is made in the above mentioned suit a Judgment by default may be entered against you."

Ct. Ct.

191 Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed_____191

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

Tn

L.S.

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 1917, to answer the complaint of

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

day of

191

Issued the

day o

October in the year 191

Notice to the person summoned:

· "Personal attendance in Court on the day named in the above writ is not required; but unless within such number of days thereafter as the law limits, legal defence is made in the above mentioned suit a Judgment by default may be entered against you."

CIRCUIT COURT 495 36 19 Docket No. William Johnson vs. Clina Johnson

ORDER OF APPEARANCE

Mr. Clerk

Please File

Sol. for

No. (7 !!!!

No. (3)

Filed (0 day of Oct 191)

Form 20

Wilber Johnson

Peleira Johnsan

MR. WHITEFORD, Clerk.

IN THE

Circuit Court

OF

BALTIMORE CITY

Depteule Term, 191

Enter my appearance for Defendant

Solictor

J. STEWARD DAVIS ATTORNEY AT LAW

WILBUR JOHNSON

IN THE CIRCUIT COURT

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#

VS.

OF

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SELINA JOHNSON.

BALTIMORE CITY.

*

TO THE HONORABLE, THE JUDGE OF SAID COURT.

The Defendant, answering says:

I.That she respectfully admits the first, and second allegation in the first and second paragraphs respectively of the plaintiff's bill.

II. That she with great respect most emphatically denies the allegations contained in the third and fourth paragraphs of the plaintiffs bill and to the contrary says that she has ever behaved herself as a good faithful and chaste wife, and that the plaintiff in this case left and deserted her.

III. That she admits the fifth paragraph of the plaintiffs bill.

IV. That she denies that the plaintiff was a good, faithful, chaste, and true husband to her and to the contrary says that he was insanely jealous of her and at times exceedingly cruel.

WHEREFORE the defendant prays:

a. That the care and custody of the oldest child Mary Elizabeth Johnson be given her inasmuchas she always has taken care of the said Mary Elizabeth and is much better preared to take care of the said child.

b. And such other further releif as the case may require.

As in duty bound etc.

Solictor for the Defendant.

Circuit Court. DOCKET No. 191 GENERAL REPLICATION. MR. CLERK, Please file Solicitorfor Plaintiff . FILED

IN THE CIRCUIT COURT BALTIMORE CITY. Term, 19 /) The Plaintiff joingissue on the matters alleged in answer of the defendant in the above mentioned caus

so far as the same may be taken to deny or avoid the allegations of the bill.

CIRCUIT COURT

1917 B Docket

Willow Pohnson

Selina Pohnson.

Order 191

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

No.

(6)

Fd / 1 Oct 1917

Wilbur Johnson	
0.	IN THE
vs.	Circuit Court
Selina Pohnson	BALTIMORE CITY.
To the Honorable the Judge of the	
Circuit Court of Baltim	ore City:
the plaintiff or a	to Willow Johns
in this case, respectfully shows that Aldesire	to take testimony in this case, and
respectfully pray that leave be granted ///	to do so before one of the Standing
Examiners of this Court.	Bankity.
ORDERED, this /7" day of leave be granted to the parties to the cause, to take to of the Standing Examiners of this Court.	of October 1917, that estimony, as prayed, before any one
M.	arthur Hump.

In the Circuit Court,

OF BALTIMORE CITY

DEPOSITIONS

Welley Johnson, Schnal Johnson,

No. 17/1897.

PLAINTIFF'S COSTS 00

Examiners \$\ Copies

Sheriff......Stenographer.....

DEFENDANT'S COSTS

Stenographer

Ad 2602-190

Wiltour Johnson In the Circuit Court	
Sefenal Common OF BALTIMORE CITY.	
The above cause lung at and	
and notice having been given me by the Solicitor for the	
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	
day of Jeffer 19/7, met on	
the day of Geloved in the year nineteen	
hundred and execute my office, in the City of Baltimore, in the State	
of Maryland, and assigned the day of Selvices	
in the same year ato'clock in thenoon and the	
office of Sephnyton Chey 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 Solicitorof the	
to take the following depositions, that	
is to say:—	

WILBUR JOHNSON, the Plaintiff in this case, produced on his own behalf, having been first duly sworn, deposeth and saith as follows, that is to say:

BY THE EXAMINER:

- 1 Q. State your name residence and occupation?
 - A. Wilbur Johnson, 1108 Division Street; laborer.
 - 2 Q. Do you know the parties to this suit?
- A. I am the Plaintiff and my wife is the Defendant.

BY MR. BOND:

- 1 Q. Johnson, when were and by whom were you married?
- A. I was married in 1908, 10th. January, 1908 at Govanstown, Maryland.
- 2 Q. By whom?
- A. Reverend James A. Frey, Pastor of the Baptist Church at Govanstown.
- 3 Q. How long did you live with your wife, until when?
 - A. Until September 30th., 1914.
- 4 Q. How long have you been a resident of the State of Maryland?
 - A. All my life.
- 5 Q. How long have you been living in Baltimor e City.

- A. Three years.
- 6 Q. How long have you been away from your wife?
 - A. Three years.
- 7 Q. Where does your wife live?
 - A. Govanstown, Maryland.
- 8 Q. How long has she lived there?
 - A. All her life.
- 9 Q. Now, in your Billyyou allege that your wife has on divers days and times since your marriage committed the crime of adultery with several men; I want you to tell me what you know about this adulterous intercourse?
- A. Yes; I know that I saw her i n adultery, because I have seen it; I saw it with my own eyes; that night I came home, and I had been away on a picnic and I told her that I was not coming home that night with my little girl, but I got home early, and when I got home my wife was not there, about half past eleven, and I went out to look for her as a man should, and as I went to look for her, I saw her and another man as she passed under a light, and they went into a field, and as they went into the field I went behind them, and I caught them, and the man was on top of her, and they stayed there about three quarters of an hour, and

she came out one way, and he came out the other; they both came out different ways; I wanted to face them both together, but she went out one way and he went out the other. After I got home and aftershe came in, I got after her about it and she said that she had gotten off at Edgewood Avenue and "alked around, and I said that it was not so, and she tried to deny it, and said that it was not so, and I kept telling her that it was, and she owned up and said that it was Charlie Smith.

- 10 Q. Have you ever heard that she ran around with fellows?
- A. Yes; I have heard lots of people lots of people have told me that shewas running around with fellows.
- 11 Q. Who were some of them that told you?
- A. He was one that told me (indicating); he told me that he had seen her with Charles Smith.
- 12 Q. What is his name (indicating).
 - A. Frank Johnson.
- 13 Q. Who else told you?
 - A. Nobody else told me.
- 14 Q. Think now; take your time?

- A. My little girl told me.
- 15 Q. What did your little girl tell you?
- A. She told me that a man was there and talked to her mother in close conversation, and after this man was gone her mother told her not to tell he; that if she did, that she was going to beat her, and the little girl told me and I promised that I would not tell her mother, and I did not tell that she told me.
- 16 Q. About what date was it when you saw this man in the field on top of your wife?
- A. That was about -- I can not just think of the exact date, I know that it was in the latter part of September.
- 17 Q. What year?
 - A. 1914.
- 18 Q. Have you lived with your wife since that night when you discovered that a man had had intercourse with her?
 - A. No.
 - 19 Q. Was that the cause of the separation?
 - A. Yes.
 - 20 Q. Did you ever in any way condone the Offense?
 - A. No sir.

- 21 Q. Is there any hope or expectation of your living with your wife again?
 - A. No sir; never.
- 22 Q. How many children were born?
 - A. Three children.
- 23 Q. In your Bill you ask for the custody of your oldest child, Mary Elizabeth Johnson; are you going to take care of and provide for Mary Elizabeth Johnson?
 - A. Yes.
- 25 Q. What has been your conduct, Johnson, since you have been away from your wife?
 - A. I have been quiet.
- 26 Q. Have you been a good chaste man since you have been away from your wife?
 - A. Yes.
- 28 Q. Have you always conducted yourself as a kind, affectionate and faithful husband?
 - A. Yes.
- 29 Q. What was your conduct towards your wife while you all were living together.
 - A. My conduct was good; it was just as good as

good as a man could treat a wife; I provided for her and did everything that I could to make it pleasant for her.

- 30 Q. How did she treat you?
 - A. She treated me all right for a while.
- 31 Q. And then how did she treat you?
- A. After a while she got to running around and fussing and going on.
- 32 Q. As I understand you, on the 30th. September, 1914, you discovered your wife in adultery and you went home that night and questioned her about it, and she acknowledged her adulteries to you; state whether or not that is correct?
 - A. Yes.
- 34 Q. Immedåately after she acknowledged her adulteries to you, what did you do?
 - A. I left her.
- 34 Q. Do you mean that you left her immediately?
 - A. Yes.
- 36 Q. Did you ever return to that house?
 - A. No sir.
- 37 Q. Have you ever lived or cohabited with her since this night of the 30th. September 1914?
 - 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

FRANK JOHNSON, a witness of lawful age, produced on behalf of the Plaintiff, having been first duly sworn, deposeth and saith as follows, that is to say:

BY THE EXAMINER:

- 1 Q. State your name residence and occupation?
- A. Frank Johnson, 1108 Division Street; Star Shirt Company.
- 2 Q. Do you know the parties to this suit?
 - A. Yes.

BY MR. BOND:

- 1 Q. Now, Johnson, when were the parties to this
- suit married?
 - A. 10th. January 1908.
- 2 Q. Where?
 - A. At Govanstown.
- 3 Q. What County and what State?
 - A. State of Maryland.
- 4 Q. When did the plaintiff separate from his wife?
 - A. 30th. September 1914.
- 5 Q. And do you know whether he held her out to the community as his wife and whether they went around together as husband and wife?
 - A. Yes.
- 6 Q. Where is the Plaintiff's home?
 - A. State of Maryland.

- 7 Q. In what City?
 - A. Baltimore City.
- 8 Q. How long has he been here?
 - A. Three years.
- 8 Q. How long has he b en a citizen of the State of Maryland?
 - A. All his life.
- 9 Q. Where does his wife live?
 - A. Govanstown, Maryland.
- 10 Q. How long has she been there?
 - A. All her life.
- 11 Q. The Plaintiff has testified that his wife on several occasions, on at least one occasion committed the crime of adultery; ddo you know anything of her having committed adultery either at that time or any other time?
 - A Yes.
- 12 Q. Tell in your own way, just what you know about this adulterous intercourse?
- A. Well, I saw him go with her to the Lee House on Courtland Street, I saw her go in there with a man; a tall dark brown skinned man, and I saw her another night with this fellow Charless Smith and I told him about it. He told me before about it.

- 13 Q. You say that you saw her go into the Lee House with a man; what sort of a house is the Lee House?
- A. Bed house
- 14 Q. Where is it located?
- A. On Courtland Street; on Courtland Street between Franklin and Mulberry Streets.
- 15 Q. Have you known of any other fellows who have carried girls there?
 - A. Yes.
- 17 Q. For what purpose did they go there; did they go there to have intercourse witheeach other?
 - A. Yes.
- 18 Q. Who did you say that she was with on this occasion?
 - A. I do not know the fellows name.
- 19 Q. You do not know the name of the man that she was with on this occasion?
 - A. No sir.
- 21 Q. When was that?
 - A. That was about the 20th. September.
- 22 Q. What year?
 - A. 1914.

- 23 Q. When did you tell Mr. Johnson of this?
- A. I did not telk him about that at all, only when he started this case.
- 24 Q. Why did'nt you tell him before this time?
- A. I did not have any special reason for not telling him; I just did not tell him; that is all.
- 25 Q. Have you ever see n Mrs. Johnson with any other men?
 - A. No sir; I never saw her with but the two.
- 27 Q. With these two men?
 - A. Yes.
- 27 Q. And who were the men?
- A. One was Charles Smith; he is one of the men.
- 28 Q. Where did you see her with Charles Smith?
- A. I saw her going up the road with Charles Smith at Govanstown.
- 29 Q. When?
 - A. That was before the separation.
- 30 Q. Did they go down into the field or anything or the sort that night?
- A. Yes; they went that way; they went down the road right beside the field.
- 31 Q. Did you follow them?

- A. No sir.
- 32 Q. Have the parties to this suit lived or cohabited together since the 30th., September
 - A. No sir.
- 33 Q. Is there any hope or expectation of their ever going back to live together any more?
 - A. No sir.
 - 34 Q. What has been Johnson's conduct since the separation?
- A. He has ben a good and true and chaste man.

 36 Q. Did you ever visit their home while living together?
 - A. Yes.
- 37 Q. How did he treat her?
- A. He treated her good, and tried to make her happy and things pleasant for her, and tried to do all that he could for her.
- 38 Q. How did she treat him?
- A. Som times T heard her snap at him in speech, and sometimes she would get to quarreling.
- 39 Q. Have you ever known a couple to go to the Lee House for any other purpose other than to have intercourse with each other?

- A. No sir; I have never known anybody else to go there for anything else.
- 4, Q. It was generally known as a bed house?
 - A. It was then.
- 41 Q. How do you know that it is a bed house?
 - A. Because I have been there myself.
- 42 Q. Have you known of other people to go there?
 - A. Yes.
- 42 Q. Did they tell you what they went there for?
- A. Yes; but they did not have to tell me, when I knew.

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. - Colored Colored

CARRIE JOHNSON, a witness of lawful age, produced on behalf of the Plaintiff, having been first duly sworn, deposeth and saith as follows, that is to say:

BY THE EXAMINER:

- 1 Q. State your name residence and occupation?
 - A. Carrie Johnson, 1108 Division Street; housework.
- 2 Q. Do you know the parties to this suit?
 - A. Yes.

BY MR. BOND:

- 1 Q. Was the Plaintiff married to the Defendant on the 10th. January 1908?
 - A. Yes.
- 2 Q. Were you present?
 - A. Yes.
- 3 Q. Did they live together as husband and wife until the 30th. September 1914?
 - A. Yes.
- 4 Q. How long has the Plaintiff been a resident of Baltimore City, State of Maryland; about how long; has it been for more than two years prior to the filing of this suit?
 - A. Yes.

Carrie Johnson.

- 5 Q. How long has he been living in this State?
 - A. All his life.
- 6 Q. How long has his wife been living in the State?
- A. She has been living in the State all her life too.
- 7 Q. Did you ever visit their home?
 - A. Yes.
- 8 Q. How did he treat his wife?
 - A. He treated her as a man ought to treat a wife.
- 9 Q. How did she treat him?
- A. She did not treat him very good at all; she did things that she ought not to; quarreled and one thing and another.
- 10 Q. Have you known her to be back with him since the separation?
 - A. No sir.
- 12 Q. Have they ever lived or cohabited with each other since the separation, 30th. September 1914?
 - A. No sir; they have not.
- 12 Q. Is there my hope of a reconciliation between them; is there any hope of expectation of them ever

Carrie Johnson.

living together again?

- A. No sir.
- 14 Q. What has been his conduct since he has been away from his wife?
 - A. His conduct; he has been very good.
- 15 Q. Chaste?
 - A. Chaste; yes.
- 16 Q. Was he a true husband to his wife, as far as you know?
 - A. Yes; as far as I know of.
- 17 Q It has been testified here that she ran around with men; do you know anything about it?
 - A. Yes.
- 18 Q. All right; tell us what you know about it.
 - A. I saw her with this man twitwo men.
- 19 Q. What are these -- What are the names of these two men?
 - A. Rugus Thomas and Charles Smith.
- 20 Q. Did you ever see her with them?
 - A. Yes.
- 21 Q. Did her husband know that shewas going around with them?
 - A. No sir; not until he found it out.

Carrie Johnson.

- 22 Q. I mean at that time.
- A. No; not at that time; he did not know it at that time.
- 22 Q. Was this prior to the separation?
 - A. Yes.
- 23 Q. Was Mrs. Johnson and these men in dakk places when you saw them.
- A. Yes; I saw her along the road, standing and talking to them in the dark.
- 24 Q. Who?
 - A. Rufus Thomas.

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 matte's in question between the parties? If so, state the same fully and at large in your answer.

A. --- Russell Shows

No other witnesses being named or produced before me, I then, at the
request of the Solicitor of the Solicitor
closed the depositions taken in said cause and now return them closed under my
hand and seal, on this JO day of goet over
in the year of Our Lord nineteen hundred and sessential at the
City of Baltimore, in the State of Maryland.
Colle Cappington (SEAL).
Examiner.
There are Exhibits with these depositions, to wit:
Plaintiff'sExhibit
\
`
Defendant's Exhibit
· '
Ca Capenda
Examiner
I, A. de RUSSY SAPPINGTON, the Examiner before whom the fore-
going depositions were taken, do hereby certify that I was employed in assigning
a day, and taking the said depositions upon days, on each
of which I was employed by the Plaintiff, and on, and on
by the Defendant
Mild Cappingthy
Examiner.

Ct. Ct. 357

Docket No.

1917

Willru Johnson Submission for Decree

Filed 27 Oct /9/7

To the Honorable

IN THE

BALTIMORE CITY.

Judge of said Court:

The above cause is respectfully submitted

for decree and the 43d General Equity Rule is hereby waived.

(! they wan's allowing for defendant

195 B B Docket No.

William Johnson

vs.

Lelina Johnson Order of Reference.

Filed 2 Tay of Oct 1977

Willow Lohnson

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY.

_Term, 19

This case being submitted, without argument, it is ordered by the Court, this

that the same be and is hereby referred to

day of Colle

Esq,

Auditor and Master, to report the pleadings and the facts, and his opinion thereon

Report of Auditor and Master.

BRIXXBEXERS SERVICE SE

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Ct. Ct. Docket No.5 SUBPOENA TO ANSWER BILL OF COMPLAINT

now Est. The Flully (Parks) though

EQUITY SUBPOENA

The State of Maryland

Un

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 November 1917, to answer the complaint of

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

day of

191 /

Issued the

10 day of

in the year 19i 7

Notice to the person summoned:

"Personal attendance in Court on the day named in the above writ is not required; but unless within such number of days thereafter as the law limits, legal defence is made in the above mentioned suit a Judgment by default may be entered against you."

Ct. Ct.

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed _____191

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

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 November 1917, to answer the complaint of

against you in said Court exhibited.

HEREOF fail not, as you will answer the contrary at your peril:

WITNESS, the honorable MORRIS A. SOPER, Whief Judge of the Supreme Bench of day of Sept. 1917

10'The day of Oct in the year 1917

Baltimore City, the

Issued the

Wellow Johnson

Clerk.

Notice to the person summoned:

"Personal attendance in Court on the day named in the above writ is not required; but unless within such number of days thereafter as the law limits, legal defence is made in the above mentioned suit a Judgment by default may be entered against you."

CIRCUIT COURT! H 1000 WILBUR JOHNSON VS. SELINA JOHNSON. Petition and Order. Mr. Clerk: -Please file. I Willin Negads Petitioner's Sols. ARTHUR R. PADGETT ATTORNEY AND COUNSELOR AT LAW

WILBUR JOHNSON

VS.

CIRCUIT COURT

SELINA JOHNSON

BALTIMORE CITY.

To the Honorable the Judge of said Court:

The petition of Selins Johnson, the above named defendant, by T. Wilbur Meads and Arthur R. Padgett, her solicitors, respectfully represents:

- 1. That she is the defendant in the above entitled suit.
- 2. That she has never been served with a writ of subpoena issued in this case by this Honorable Court, and that the docket entries therein show that she has been returned "non est" on October 8, 1910.
- 3. That the said docket entries and the papers in this suit further show that J. Steward Davis, Esq., a member of the Baltimore Bar, filed an appearance on behalf of your petitioner on October 10th, 1917, but that he did hot file a written authority or warrant of attorney from your petitioner.
- 4. That on or about October 7th, 1917, the said J. Steward Davis called to see your petitioner at her home in Govanstown, Maryland and told her that her husband had filed a suit for divorce against her and that he would like to represent her, but your petitioner refused and told him to come to see her when her parents were home.
 - 5. That on or about October 10th, 1917, your petitioner received the following letter from the said J. Steward Davis:

October 9th. 1917.

Mrs. Selina Johnson 801 Woodburn Ave.,

My Dear Madam:

In keeping with my promise of Sunday, I beg to state that I will call to see your father and mother Wednesday evening

about 8.30 in the evening.

Hoping that the same is agreeable to you,

I remain.

which letter your petitioner did not answer.

6. That on or about October 25th, 1917 your petitioner received another letter of said J. Steward Davis as follows:

October 26th. 1917.

Dear ladam:

Yours

J. Steward Davis.

The enclosed power of attorney mentioned in said letter is _ as follows:

Baltimore, Md. October 8th.1917.

I hereby appoint J. Steward Davis my attorney to represent me in the case of wikidalawas Johnson vs. Johnson, Circuit Court for Baltimore City.

7. That your petitioner never saw said J. Steward Davis after his said interview with her on October 7th, nor did she reply to either of his said letters nor sign said power of attorney, but your petitioner did consult T. Wilbur Meads, Esq. and showed him the letter dated October 26th, 1917 and set out in paragraph 6 hereof; that the said T. Wilbur Meads advised your petitioner that she need not take any action in said suit until she had been served with a subpoens from this Honorable Court.

- 8. That even though your petitioner had not authorized the said J. Steward Davis to enter his appearance for her and even though the said J. Steward Davis had by his said letter dated October 26th esked your petitioner to sign a power of attorney, he, the said J. Steward Davis, had entered his appearance on behalf of your petitioner on October 10th, 1917, as the papers in this case will more fully show, without any authority whatsoever from your petitioner.
- 9. That regardless of the fact that the said J. Steward Davis had no authority to represent your petitioner in this suit, he filed an answer in her behalf and continued in said case signing all the necessary papers down to the submission for a decree, but there is nothing to show that he was present at the taking of testimony, and your petitioner had no notice whatsoever of the taking of said testimony.
- 10. That the said bill alleges and the testimony, taken in this case ex parte, accuses your petitioner with having committed adultery and with having desert/the plaintiff all of which your petitioner says is untrue.

Wherefore your petitioner prays:

- 1. That an order may pass directing the plaintiff, Wilbur Johnson, to show cause why all the proceedings in this case subsequent to the filing of the bill should not be dismissed and declared null and void and of no effect.
- 2. That your petitioner be given fifteen days after a final hearing of this petition within which to file her answer to said bill.
- 3. And for such other and further relief as may be proper in the premises.

Mun left Solicitors for Petitioner

Petitioner.

STATE OF MARYLAND, BALTIMORE CITY, to wit:

of November in the year one thousand nine hundred and seventeen before me a subscriber a Notary Public of the State of Marykand in and for Baltimore City aforesaid personally appeared Selina Fohnson the above named petitioner and made oath in due form of law that the matters and facts set out in the above petition are true to the best of her knowledge and belief.

Witness my hand and notarial seal.

Notary Public.

Upon consideration of the foregoing petition and affidavit it is ordered by the Circuit Court of Baltimore City this day of November, 1917, that all the proceedings in this suit of Wilbur Johnson vs. Seline Johnson subsequent to the filing of the bill be and the same are hereby stricken out and declared null and nutthen the limit wall remain hable for court cats lands account void and of no effect, and that said defendant be and she is hereby allowed to answer said bill within fifteen days after a final determination of this petition in favor of said defendant, unless cause to the contrary be shown on or before the wall day of November, 1917, provided a copy of this order be served on the said plaintiff or his solicitor on or before the wall day of November, 1917, and provided further that a copy of this order be served on J. Steward Dayis or left at his office at 215 Courtland Street on or before the

aucust Court Willer plusar 917 Seling Johnson Paner of attorney un . Clust! Plus ple. J. Willin Mends Arthur R. Perlyet Duls. 1317111 A10 De 1917

WILBUR JOHNSON

VS.

CIRCUIT COURT HORE CITY.

I hereby authorize T. Wilbur Meads, Esq. and Arthur R. Padgett, Esq. to represent me as my solicitors in the above entitled suit.

A80.10,1917

Defendant.

WILBUR JOHNSON

VS.

SELINA JOHNSON.

Answer.

Mr. Clerk:-

Defendant's Sols.

ARTHUR R. PADGETT

VILBUR JOHNSON IN THE

VS. CIRCUIT COURT

SELINA JOHNSON. OF

BALTIMORE CITY.

To the Honorable the Judge of said Court:-

The snswer of Selina Johnson to the bill of complaint, filed against her in the above entitled suit, respectfully shows:

- 1. That she admits the allegations in paragraph one, except the dates set out therein and demands strict and full proof thereof.
- 2. That she neither admits nor denies the allegations of paragraph two. but demands full and strict proof thereof.
- 3. That she denies the allegations in paragraphs three and four.
 - 4. That she admits the allegations in paragraph five.
- 5. That she denies that the complainent has ever been a good, faithful, chaste, affectionate and true husband to her, and alleges that the complainant has conducted himself with other women in a manner inconsistent with the conduct of a good, faithful, chaste affectionate and true husband.

That having fully answered said bill of complaint, she prays to be dismissed with her costs.

Mulling means

Defendant. Johnson

WILBUR JOHNSON VS. SELINA JOHNSON. SELINA JOHNSON VS.

WILBERT JOHNSON also known as WILBUR JOHNSON.

CROSS BILL.

MR. Clerk.

Please file. J. Willy Mussel

Mully aug 19 Defendent's Sols.

ARTHUR R. PADGETT

ATTORNEY AND COUNSELOR AT LAW

525-526 WASEY BUILDING

BALTHORE

WILBUR JOHNSON

VS.

SELINA JOHNSON

AND

SELINA JOHNSON

VS.

WILBERT JOHNSON also known as WILBUR JOHNSON.

CROSS BILL.

IN'THE

CIRCUIT COURT

OF

BALTIMORE CITY.

To the Honorable the Judge of said Court:-

Your oratrix, filing her cross bill, by T. Wilbur Meeds and Arthur R. Padgett, her solicitors, complaining says:

- 1. That heretofore she was sued for a divorce a vinculo matrimonii in this Honorable Court on the grounds of adultery and abandonment, which she has denied in her answer and has shown that her husband is not entitled to the relief prayed for.
- 2. That on or about the 10th day of January, 1909 she was married to the said Wilbert Johnson, and she has resided in the State of Maryland for more than two years last passed.
- 3. That there hat been three children born to them as a result of said marriage, viz: Evelyn Johnson, almost three years of age.

 Lillian Johnson four and one half years of age and Mary Elizabeth

 Johnson seven and one half years of age.
- 4. That ever since their said marriage your oratrix has behaved herself as a faithful and affectionate wife toward the said Wilbert Johnson.
- 5. That the said Wilbert Johnson on divers days and times since the said marriage has committed the crime of adultery, and your oratrix has not lived or cohabited with the said Wilbert Johnson since she has discovered the said adultery nor condoned the said offences in any manner.
 - 6. That the said Wilbert Johnson without any just cause or

reason abandoned and deserted your oratrix on or about the fourth day of October, 1914, that said desertion has continued uninterruptedly ever since, is deliberate and final and beyond any reasonable expectation of reconciliation.

7. That your oratrix has no means of her own for support, whilst the defendant is steadily employed at a wage of eighteen dollars (\$18.00) per week.

To the end therefore.

- 1. That your oratrix may be divorced a vinculo matrimonii from the said Wilbert Johnson.
 - 2. That she may be awarded the custody of said infant children.
- 3. That she may be allowed alimony pendente lite, as well as permanent alimony for the support of herself and said infant children, and also a reasonable sum as a counsel fee for her solicitors of record.
- 4. That your oratrix may have such other and further relief as may be proper in the premises.

May it please your Honor to grant unto your oratrix the writ of subpoens, directed to the said Wilbert Johnson at Baltimore City and State of Maryland, commanding him to be and appear in this Honorable Court on some certain day to be named therein, and answer the premises and abide by and perform such decree as may be passed therein.

And as in duty bound etc.

May Padgett Solicitors for Complainant.

Complainent.

STATE OF MARYLAND, CITY OF BALTIMORE, to wit:

I hereby certify that on this wifth and day of December, 1917, before me the subscriber, a Notary Public of the State of Maryland, in and for Baltimore City aforesaid, personally appeared Selina Johnson, the within named Complainant, and made oath in due form of law that the matters and facts herein set forth are true to the best of her knowledge, information and belief.

Witness my hand and Notarial Seal.

Notery Public

Ct. Ct. SUBPOENA TO ANSWER BILL OF COMPLAINT arthur R Padget SOLICITOR

EQUITY SUBPOENA

The State of Maryland

Un

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

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 2 day of Avenue 191)
day of Occurred in the year 191 Baltimore City, the

Issued the

Notice to the person summoned:

"Personal attendance in Court on the day named in the above writ is not required; but unless within such number of days thereafter as the law limits, legal defence is made in the above mentioned suit a Judgment by default may be entered against you."

IN THE CARCUIT COURT
BALTIMORE CARA

Wilbur Johnson

/ - VS. --

Selina Johnson and Selina Johnson

VS.

Wilbur Johnson.

Answer to Cross Bill.

MR. Clerk, Pléase flé, etc.,

Sol for Plaintiff.

31711,

fd14 Jdy 1918

COMMERCIAL PRINTING & STATIONERY

Wilbur Johnson

VS.

Selina Johnson

and

Selina Johnson

Vs.

Wilbur Johnson.

IN THE CIRCUIT COURT OF BALTIMORE CITY.

To the Honorable the Judge of said Court:

Your respondent filing his answer to the cross-bill of the defendant Selina Johnson, respectfully says:

- I. He admits the first, second, and third paragraphs of said bill.
- II. He most emphatically denies the fourth and fifth paragraphs and to the contrary says that he has always demeaned hinself as a faithful, affectionate and chaste husband to the said defendant.
- III. He neither admits nor denies the allegations contained in the sixth paragraph of said bill, and demands strict and legal proof of all therein contained.

ŦŶ.

He denies that he is steadily employed at a regular wage of eighteen dollars per week and further denies that his wife is without means of her own to defray the expenses relative to her end of this litigation.

Wherefore, having fully answered all the material allegations of defendant is cross bill, your respondent prays that he be hence dismissed with proper costs.

And as in duty bound he will ever pray.

Solicitor Plaintiff

Serve on ORDER OF COURT

.

Selma Johnson

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY.

Circuit Court. Selina Johnsay GENERAL REPLICATION. MR. CLERK, Please file Solicitor & for Plaintiff .

2	
Selina Johnson	IN THE
	CIRCUIT COURT
vs.	OF
Wilbert Johnson ets. (Crosbill)	BALTIMORE CITY.
(Crosbill)	Term, 19
The Plaintif	f joinsissue on the matters alleged in answer of
the above named by	lendant,
,	
so far as the same may be taken to deny or avoid the	he allegations of the bill.
arthur P.	Padgett
	Wilher Mends
	Solicitor & for Plaintiff .

CIRCUIT COURT

495

Docket 57B

Willer Stevens
Selvin Johnson
Willert Folian etc

Order 191

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

No.

Fd 28 Schwary 1915

Willin Joliusa	
Seling Johnson	IN THE
Grown	Circuit Court
Selvin Slusar	/ -OF
Wilbert Johnson etc.	BALTIMORE CITY.
To the Honorable the Judge of the	
Circuit Court of Baltim	ore City:
THE PETITION OF Selvia Jo	lum above
named	
in this case, respectfully shows that she desire s	to take testimony in this case, and
respectfully prays that leave be granted ker	to do so before one of the Standing
	eller Myself on Selin Johnson
ORDERED, this 284 day o	estimony, as prayed, before any one
leave be granted to the parties to the cause, to take t	estimony, as prayed, before any one
of the Standing Examiners of this Court.	
	Mini Alfin

In the Circuit Court, OF BALTIMORE CITY **DEPOSITIONS** No. PLAINTIFF'S COSTS Examiners \$ Copies Sheriff..... Stenographer DEFENDANT'S COSTS Examiners \$ Copies Sheriff..... Stenographer

Selina Johnson OF BALTIMORE CITY. The above cause very at well
and notice having been given me by the Solicitor for the Journal 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 Gurt passed in said cause on the day of live in the year nineteen
hundred and and at my office, in the City of Baltimore, in the State
of Maryland, and assigned the day of Maryland
in the same year at o'clock in the of the noon and the
office of Jacob State 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

life Johnson Jdo Belina Johnson

SELINA JOHNSON, the Plaintiff in this case, produced on her own behalf, having been first duly swern, deposeth and saith as follows, that is to say:

BY THE EXAMINER:

1 Q. State your name residence and occupation?

- A. Selina Johnson, Woodburn Avenue; Govans; washing and ironing.
- 2 Q. Do you know the parties to this suit?
- A. I am the Plaintiff and my husband is the Defendant in the Cross Bill.

BY MR. PADGET:

- 1 Q. Now, Selina, when were you married to the Defendant?
 - A. January 10th., 1909.
- 2 Q. Have you a certificate of your marriage?
 - A. Yes.

Note: Same produced a filed as Plaintiff's Exhibit Examiner No. 1.

- 3 Q. How long have you lived in the State of Mary-land?
- A. I was born here, and I am twenty-five years old now.
- 3 Q. You have lived here ever since?
 - A Yes.

- 4 Q. Have you lived in Maryland since you were married?
- A. Yes; I have lived in Baltimore since I was married.
- 5 Q. Were you married to anybody else before you were married to this man.
 - A. No sir.
- 6 Q. Are there any children of this marriage?
 - A. Three.
- 8 Q. What are their names and ages?
- A. Mary E. eight years old; Lillian, five and Evelyn three years old.
- 8 Q Have you always been a faithful and affectionate wife towards your husband?
 - A. yes.
- 10 Q. Did you ever give him any reason to leave you?
 - A. No; I did not.
- 11 Q. Now, do you know anything as to whether your husband went around with other women or nota
 - A. Yes.
- 12 Q. State what it was.
- A. Well, the girl that I know that he went around with was a girl in Govanstown. He went

around with her before he left me. He would go out and stay all night long, and would come home in the morning, and whenever I wanted him I could find him there whenever I went there, I could, - I could always find him thefe.

- 14 Q. What was the name of this girl.
 - A. Beatrice Benson.
 - 15 Q. Where did she live?
 - A. Glenwood Avenue.
- 16 Q. Glenwood Avenue, Govanstown.
 - A. Yes.
- 17 Q. How close is that to where you live?
 - A. I guess about four or five squares.
- 18 Q. Four or five squares from your house?
 - A. Yes; not any more than that.
- 19 Q. You used to see him down there at that house.
- A. Yes; I used to see him there, and whenever I went there I could find him right there.
- 20 Q. Now, when did you find out that hewas running with this woman?
- A. Well, it must have been, I guess it was a year or so before he left me.
- 21 Q A year or so before he left you?
- A. Yes. I used to hear so much talk, but I did not believe what I heard, and I watched to find

out, and when I began to watch I found out that what I had heard was true.

- 23 Q And you say that he left you?
 - A. Yes.
- 23 Q. Whenddid he leave you?
 - A. October.
- 24 Q. What year?
 - A. 1914.
- 26 Q. Now, did he have any just reason or cause to leave you?
 - A. No sir; he did not.
- 26 Q. Will you state just what happened at that time.
- A. I heard that that Sunday night he stayed out all night long and he came in Monday morning and commenced to pack up his clothes and said -- I said "What are you going to do" and he said "I am going to leave you". It all started about a dress that I wanted him to buy me and he would not buy it for me and I wan t and bought it myself, and he said that if I could buy something to dress in that I could buy something to eat, and when I came in that day I caught him standing over the dress with a razor in his hand about to cut it up, and I got after him about it, and he packed his clothes and said that he could go

where he could get something to eat; that he had more thanoone home; that this was not the only home, and he said he did not have to work, and that he had some one working for him every day.

- 27 Q. What day was that?
 - A. Monday.
- 28 Q. On or about October 4th.
- A. Yes; on or about October the 4th., was when he came back after his sui. case, and this Sunday was just before October 4th.
- 29 Q. The Sunday before October 4th.
 - A. yes; in the same week.
- 30 Q. He packed up his clothes, you say, at that time.
 - A. Yes.
 - 31 Q. And left?
 - A. Yes.
- 32 Q. And when did he come back again.
 - A. On Friday night.
- 33 Q. The following Friday.
- A. Yes; the following Friday of the same week.
- 34 Q. That was October 4th?
 - A. Yes; about that.

- 35 Q. And what did he do?
- A. He said that he wanted to get his clothes, and said that he was going to leave, and when he got out in the yard he turned around, and he told me to get the oldest child ready that he was going to take her with him, and I said no that he would not that if he could not provide for his child there that he could not provide for her if he took her away.
- 36 Q. Did he say anything else at that time.
 - A. He said very little to me that night.
- 37 Q. But he left that time?
 - A. ves.
- 38 Q. Has he been back to you since?
 - A. No sir.
- 38 Q. Has he tried to come back to you; has he tried to make up with you.
 - A. Mo sir.
- 40 Q. You have not seen him at all.
 - A No sir.
- 42 Q. Now, after October 4th., 1914, what did you do with respect to him supporting yourself and children.
 - A. I had him arrested for non-support.
- 41 Q. You had him arrested for non-support?
 - A. Y^{es}.

- 42 Q. What magistrate did you go before?
 - A. Mr. Meades.
- 43 Q. A Justice of the Peace.
 - A. Yes.
- 43 Q. At Towson?
 - A. Yes.
- 44 Q. At Govans?
 - A. Yes; at Govans it was.
- 46 Q. And you swore out a warrant for his

arrest?

- A. Yes.
- 47 Q. And had him arrested?
 - A. Yes.
- 47 Q. What happened at the trial.
 - A. He was ordered to pay me three dollars .
- 48 Q. Three dollars a week?
 - A. Three dellars a week; certainly.
- 49 Q. Did he defend himself and say that he had not left you or anything of that kind.
 - A. He said that he had left.
- 50 Q. He said that he had left?
 - A. Yes.
- 50 Q. And did he pay you the money after that.

- A. He paid the three dollars regularly after that for a time. And then he got down to two dollars, and then dedid not get anything.
- 51 Q. Is his abandonment of you deliberate and final?
 - A. Yes.
- 52 Q. And beyond any hope of a reconciliation?
 - A. Yes.
- 53 Q. How much does your husband made, do jou know?
 - A. I judge that he gets from \$2.50 to
- \$3. a day; not less than that I know.
- 53 Q. He was ordered by Judge Meade to pay three dollars a week?
 - A. yes.
- 55 Q. Now, I want to ask you this: How much do you think that you can get on with at the present time? That would be about the same, would'nt it?
 - A. Yes.
- 55 Q. About three dollars a week?
 - A. Yes.

CROSS EXAMINATION BY MR. BOND:

- 1 Q You say that he left you October 4th.
 - A. Yes.

2 X Q. What year?

A. 1914

3 X Q. October 4th., 1914?

: A. Yes.

4 X Q. Did you give him any cause for his leaving?

A. No sir.

5 X Q. You do not know why he left.

A. He left because I was not willing to support him; work.

6 X Q. You say that he threatened to cut you with a razer?

A. I said that he was going to cut a dress that I had bought, but he threatened to do me harm many times.

7 X Q. With regard to your testimony in direct examination, that he wanted to take the child with him?

A. Yes; he did.

9 X Q. Do you want him to have the custody of the child now?

A. No sir.

10 X Q. You dont object to him seeing the child and taking it out for a walk and the like of that?

A. do object

11 X Q. Why?

A. I do not want him to have anything toddo with the children; he is not fit to see them.

11 X Q. It is his child?

- A. Yes; it is his child.
- 12 X Q. Do you object to him seeing the child.
- A. He can see it if he comes to the house, but I do not want him to take her away to any place. He does not care anything for her; if he had he would have done something for her.
- 13 X Q. Would you object to his moth r taking the child for a walk and bringing it back to you.
 - A. I dont think that I would object to her.

ANNIE WILSON, a witness of lawful age, produced on behalf of the Plaintiff, having been first duly sworn, deposeth and saith as follows, that is to say:

BY THE EXAMINER:

- 1 Q. State your name residence and occupation?
- A. Annie Wilson, Woodburn Avenue; Govanstown; washing and ironing.
- 2 Q. Do you know the parties to this suit?
 - A. Yes.

BY MR. PADGET:

- 1 Q. Who is the Plaintiff?
 - A. The Plaintiff is my daughter.
 - 2 Q. The Plaintiff is your daughter?
 - A. Yes.
- 3 Q. Now, do you know that your daughter was married to the Defendant on January 10th., 1909?
 - A. Yes.
- 4 Q. How do you know that.
 - A. It was right in the parlor and I was a witness.
- 6 Q. And saw them married?
 - A. Yes.
- 7 Q. Whomwas the Minister.
 - A. The Reverend James Frey.
- 8 Q. You know that Mr. and Mrs. Johnson have the reputation of being married among the people who know them

- A. Yes.
- 9 Q. And they lived togetheraas husband and wife?
 - A. Yes.
- 10 Q. And have three children?
 - A. Yes.
- 11 Q. As testified to by the Plaintiff?
 - A. Yes.
- 12 Q. Now, at that time were they living at your house?
 - A. They stayed there all the time.
- 13 Q. They stayed there all the time.
 - A. Yes.
- 14 Q. And she still lives at your house?
 - A. Yes.
- 15 Q. Now, did she behave herself as a faithful and affectionate wife towards her husband?
 - A. She certainly did.
- 16 Q. And did her duty as a wife should?
 - A. She certainly did. .
- 17 Q. You have heard the Plaintiff testify as
- to the abandonment of her by her husband
 - A. Yes.
- 18 Q. Can you tell us what you know about that.

WITNESS: what do you mean; when he left her.

COUNSEL: Yes. He came in that morning and started the pack up his clothes; he had stayed out Sunday night all night and he came home in the morning wery early and packed up his clothes and went out.

- 19 Q. That was prior to August 4th., 1914.
- A. Just previous to it; the same week; and he did not come back any more until Friday, October 4th., 1914, and he packed up his suit case and all, and said that he was going to leave and after he got outside, he said for her to get the child ready, that he was going to take her with him, and she said no he would not, that if he could not support her where she was that he could not support her where he would take her.
 - 20 Q. Has he ever come back since that time?
 - A. No sir.
- 21 Q. Were you present at the trial before Judge Meades?
 - A. Yes.
- 22 Q. Has he sent her any money for suppo t outside of what Judge Meads ordered?
 - A. No sir; not a penny.
- 22 Q. Do you know anything about whether the Defendant ran around with women or not.
 - A. I certainly do.

- 23 Q. What do you know about that?
- A. He lived right across the lot from me, and he and when I used to go to Church I would see him going drown the back with her as a courting couple, and he was holding her hands.
- 24 Q. What is this girl's name.
 - A. Bertha Benson.
- 35 Q. Bertha Benson.
 - A. Bertha Johnson or Benson.
- 26 Q. Then did she take his name.
- A. No; I dont think so. She was a Johnson, and she married a man by the name of Benson, but she goes by the name of Bessie Benson now.
- 27 Q. Did the Defendant have any reason for leaving your daughter?
 - A. No sir; not a bit in the world.
 - 28 Q. No reason at all?
 - A. No sir.
- 29 Q. Is his desertion in your opinion delib rate and final and beyond any reasonable expectation of a sconciliation?
 - A. Yes.
- 30 Q. And has this desertion continued uninterruptedly since october 4th, 1914,

- A. Yes.
- 31 Q. Do you think that she can get along on \$3a a week alimony at the present time.
 - A. Yes; I think so with her working.
- 31 Q. With the three dcllars a week and the money she received from her work she can get along?
 - A. Yes.

CROSS EXAMINATION BY MR. BOND:

- 1 X Q. You do not know the cause of his leaving?
- A. No sir; only that he left, and this woman was the only cause that I know of.

T. WILBUR MEADES, a witness of lawful age, produced on behalf of the Plaintiff, having been first duly sworn, deposeth and saith as follows, that is to say:

BY THE EXAMINER:

- 1 Q. State your name residence and occupation?
 - A. T. Wilbur Meades, Govanstown; Attorney at Law.
- 2 Q. Do you know the parties to this suit?
 - A. I do.

BY MR. PARGETT:

- 1 Q. Now, Mr. Meades, the Plaintiff has testified that she had her husband arrested subsequent to October 4th., 1914. Do you know when this case was tried.
 - A. May 22nd., 1916
- 2 Q. What happened?
- A. Well, at that time I was Justice of the Peace at Govanstown; she came up and swore out a warrant for him for non-support of herself and three children, and I issued the warrant and gave it to the Officers, and the Officer arrested him and he was brought before me, and he waived his right to a jury trial and the State waived their right to a jury trial, and he was tried before me, and found guilty, and ordered to pay three dollars a week, and I understand that he did that for several weaks, and then it got down to two dollars. I think for possibly a year; and he would

T. Wilbur Meads.

pay something after that but not regularly; it was paid to me and I paid it over to her.

- 3 Q. Is this a certified copy of the Docket entries of that case?
- A. It is. I would like to say this, to make it clear: I was Magistrate from May 1916 to the latter part of March 1917, when I resigned. On the 18th. May 1917, I turned my criminal docket into the Clerk's office of the Circuit Court at Towson, and this copy was taken from that.
- 4 Q. But that was taken from your docket?
 - A. Yes.

NVte: Same produced and filed as Plaintiff's Exhibit Examiner No. 2.

CROSS EXAMINATION BY MR. BOND:

- 1 X Q. At the trial before you your Honorable Court, did he say whether he left or whether she left him.
 - A. Well,- Let's see----

COUNSEL INTERRUPTING: Was there any statement made as to which one left the other.

witness: I do not recall whether there was any statement of that kind made; the question before me was whether

T. Wilbur Meads.

he was supporting his wife and children.

2 X Q. But there had been a separation.

A. Yes; there had been a separation.

rEDIRECT EXAMINATION BY MR. PADGETT:

1 R D Q But you are sure that she stated that he left her?

A. Yes.

2 R D Q. Of course, the cause of the separation did not come up before your Court?

A. No sir; it was just a matter of whether he was supporting the children at that time, - or her. 3 R D Q. Did Kate Johnson, the mother of the Defendant, testify before you.

A. Yes.

4 R D Q. Did she accuse the Plaintiff of ever having done wwwrong.

A. No.

5 R D Q. And did her husband, the Defendantk accuse his wife of having done wrong.

A. It is a little hard for me to remember those things. I have a memorandum here. No; he did not; he did not accuse her of doing wrong.

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. ---

1. Willul Tueady

SELINA JOHNSON, the Plaintif f in this case, having been heretofore produced and sworn, recalled:

BY MR. PADGETT:

- 1 Q. You remember that your husband sued you for divorce originally in this case?
 - A. Yes.
- 2 M. And you have filed a Cross Bill?
- A. Yes.
- 3 Q. Did you testify under the ortginal Bill filed by your husband?
 - A. No sir.
- 4 Q. When did you first learn about that suit that he had against you?
 - A. One Sunday afternoon.
- 5 Q. Tell us about that.
- A. A man came to the house and said that he was an attorney at law; the name was Davis, I think, and said that he had filed a bill against me, and that I did not have to do anything, that it did not cost me a penny if I signed the paper, and I would not sign the paper, and he went away, and two or three days after that he came back to see me, and I said that I would rather he come back and see me when my parents was at home, and he said that later in

the week that he would be at the house, and - c n a Thursday, and Thursday he never showed up, and he sent a special delivery and he said that I must have mislaid the paper, and why did'nt I sign it, and he sent another paper and I would not sign it, and then he sent another fellow and wanted me to sign another paper, and I would not sign, and that is the first that I knew about it.

- 6 Q. Do you remember what date that was.
 - A. I can not remember that date now.
- 7 Q. You received the letter about October 26th., 1917; about that time?
- A. Yes; I know that it was in the month of October.
- 8 Q. A power of attorney?
 - A. Yes; a power of attorney.
- 10 Q. A power of attorney in that letter?
- A. Yes; he said that if I signed that it would give him the right to go ahead.
- 11 Q. That was in October?
 - A. Around that, I think.
- 12 Q. But you never signed it.
 - A. No sir

- 13 Q. And since that time you have employed myself and Mr. Meades, and we had the whole proceeding stricken out since the filing of the Bill; is that correct? .
 - A. Yes.
- 14 Q. In the testimony given by William Johnson, he accuses ayou of having committed adultery with Charles Smith in September of 1914; is that true?
- A. No sir; it is not true. He never saw me with any man the whole time that I was with him, and he can not saynthat I committed anything like that.
- 15 Q. You always stayed home, did you?
 - A. Yes.
- 16 Q. Did not go out at night?
- A. No sir. When I went any place I went with him.
- 17 Q. You never went out by yourself.
- A. Not unless I went around the road to go to work or come to town or to the market.
- 18 Q. Did you ever stay out all night?
- A. No; I never stayed out all night; even while I was single I did no; do that.
- 19 Q. Another witness has testified in his testi mony

that he saw you go to the Lee house on Courtland Street; a house of bad repute, and that he also saw you with Charlie Smith out on the road near a field in Govans.

- A. He never saw it.
- 20 Q. What have you to say to this.
 - A. It is not true.
- 21 Q. Do you know where the Les House is?
 - A. No sir.
- 22 Q. Did you ever hear of it before?
 - A. No sir; not until I heard it in this Bill.
- 22 Q. Do you know where Courtland Street is.
- A. No sir; I have never been on Coursland Street.
- 23 Q. You do not know where Courtland Street is?
 - A. No sir; I have never been on Courtland Street.
- 25 Q. Where is Charlis Smith now?
 - A. Dead.
- 27 Q. When did he die?
- A. He died last May, I think; I hink it was last May.
- 28 Q. It was before the taking of testimony in this case
 - A. Yes.
- 28 Q. Did he die hefore last October?
 - A. Y^{es}.

- 29 Q. October 1917?
 - A. Yes.
- 30 Q. How much before that?
- A. He died in the Spring, I think it was; in April.
- 32 Q. Before last Summer?
 - A. Yes.
- 33 Q. He died in the Spring of 1917?
 - A. Yes; along about there.
- 33 Q. Now, another witness testified at this previous taking of testimony that she saw you with two men;
 one was Rufus Thomas, and the other was Charles Smith;
 do you know Rufus Thomas?
- A. Yes. She might have seen me talking to him.

 If I meet anybody of course and have anything to say,

 I would stop, and speak; I do not run away from anybody.

 Any one may see me talking to them, but they never saw

 me in any improper conduct.
- 34 Q. Did you ---

WITNESS INTERRUPTING: They testified to a different thing when defore Justice Meades. Why did nt they testify to that then if it was true. He left because he did not want to work and support me; if he left because I was doing wrong, why did nt he say that then when he

was tried before Judge Meades., They never mentioned it; the three of them did not mentioned t. She said - that woman - that she did not know anything about me.

- 35 Q. They were before Judge Meades?
 - A. Yes.
- 36 Q. And you say that you have never been guilty of adultery?
 - A. Yes.

BY MR. BOND:

- 1 Q. Do you know where Mr. Davis is now?
 - A. I heard that he was at Camp.
- 2 Q. Camp Meade.
 - A. Yes.
- 3 Q. You do not know yourself, whether he is in the service of his Country now, or not, do you?
 - A. No sir.
- 4 Q. You have just heard it.
- A. Yes. I saw him in uniform, so I suppose he is serving his Country.

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. ---

Selina Johnson

ANNIE WILSON, a witness heretofore produced and sworn, recalled:

BY MR. PADGETT:

- 1 Q. Did the Defendant ever accuse his wife of running around with other men?
- A. No sir; I never heard him say anything about running around.
- 2 Q. Did she to your knowledge run around with other men?
 - A. No sir; I was too strict on her.
- 3 Q. Did she stay out at night at any time?
 - A. No sir.
- 4 Q. Did she have any improper relations, as far as you know with Rufus Thomas or Charles Smith?
 - A. No sir.
- 5 Q. Do you know whether she ever went to the Lee House?
- A. No sir; I dont think my girl ever went to any such places; T did not raisehher for that.
 - 6 Q. Do you know anything about it, where it is.
 - A. No sir.
 - 7 Q. Did you ever hear of it before?
 - 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. ---

Annie Wilson

No other witnesses being named or produced before me, I then, at the
request of the Solicitor of the antest
closed the depositions taken in said cause and now return them closed under my
hand and seal, on this day of far as
in the year of Our Lord nineteen hundred and leg hteese at the
City of Baltimore, in the State of Maryland.
Celo Cappington (SEAL).
Examiner.
There areExhibits with these depositions, to wit:
Plaintiff's Exhibit Colament 8
Defendant's Exhibit
)
Mis Wapping
Examiner.
I, A. de RUSSY SAPPINGTON, the Examiner before whom the fore-
going depositions were taken, do hereby certify that I was employed in assigning
a day, and taking the said depositions upon days, on each
of which I was employed by the Plaintiff, and on and on the plaintiff
by the Defendant
Examiner.

IN THE CIRCUIT COURT No. OF BALTIMORE CITY PLAINTIFF'S EXHIBIT EXAMINER No. FILED WITH THE EXAMINER A. deR. SAPPINGTON

* C-C*

Docket
Folio
STATE-OF-MATYLAND.
. vs
WILBERT T. JOHNSON.
Short Copy Docket Entries and Judgment
Filed191
THE JEFFERSONIAN PRINT TOWSON MD

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50

STATE	IN THE	
vs.	Circuit Court for Baltimore County	
WILBERT-T JOHNSON, LLLO Davidson Street, Baltimose, Md.	Term, 191_6.	
Plaintiff's Costs, \$ Defendant's Costs, \$ May 22, 1916 on oath of Selina Johnson, warrant issued directed to any officer. May 22, 1916 returned capi. May 23, 1916 Accused waived his right to jury trial. Same day; State's Attorney waived right to jury trial upon part of the State, Same day; trial had, plea not guilty. Judgment Guilty. Sentence that accused pay each week beginning Saturday May 27, 1916, \$3.00 per week until further order, for the support of three children and costs of case; Same day costs		
paid and accused released, sub	ject_to_further_orders(Seal)	
STATE OF MARYLAND, BALTIMORE CO I, WILLIAM P. COLE, Clerk of the Circ the aforegoing is a true and full copy of		
IN TESTIMO	ONY whereof I hereunto subscribe my name and affix aid Circuit Court thisday LackA. D. 1918 Clerk of the Circuit Court for Baltimore County.	

Docket No.57B 495
1917

Muun

vs.

Juliusan

Submission for Decree

(22)

Filed 22 March 1918.

495

Docket No. 57 B

Jahnson.

Johnson.

Order of Reference.

B 17/1/ (23)

Filed 22 day of March 1918

IN THE

CUIT COURT

BALTIMORE CITY

case being submitted, without argument, it is ordered by the Court, this

1918, that the same be and is hereby referred to Ward B. Cor

Esq.,

Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Mino A Lope

Report of Auditor and Master

Bill for divorce a vinculo matrimonii and for the custody of one of the minor children of the parties filed by the husband against his wife on the grounds of adultery and of abandonment.

J. Steward Davis, Esq. appeared for the defendant, but without written authority. The testimony taken appeared to establish the adultery of the wife and the husband would have been entitled to a decree upon the filing by Davis of written authority from the wife to represent her.

Thereafter defendant filed a petition alleging that she was not summoned and that Davis appeared for her without authority and the Court passed an order striking out all proceedings in the case subsequent to the bill. The defendant thereupon, after answering, filed a cross-bill for divorce a vinculo matrimonii, for the custody of the minor children and for permanent alimony on the grounds of adultery and of abandonment. Code 1911, Art. 16, secs. 36-41.

Defendant to cross-bill summoned and answers by Testimony taken on behalf of plaintiff in cross-bill. solicator.

Residence of plaintiff in cross-bill in Maryland proven.

The marriage proven.

The abandonment by defendant to cross-bill, its finality and the irreconcilability of the parties proven.

Case made for giving the custody of the minor children

to the plaintiff in the cross-bill.

It is submitted that the wife's testimony denying the adultery alleged against her (together with the defendant's failure to himself again testify or to recall his witnesses) sufficiently discredits this charge against the wife.

Attention is called to the wife's testimony that Davis appeared for her to the original bill without authority. It also tends to show that Davis is now a soldier. He appears to have taken no part in the proceedings on the cross-bill.

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

Case submitted and ready for decree.

Auditor and Master.

March 26th, 1918.

Fee \$13.50 paid.

CIRCUIT COURT

B-495-

1917.

No. 57 Docket

WILBUR JOHNSON

4VS4

VS.

SELINA JOHNSON

CROSS BILL.

SELINA JOHNSON

-VS-

WILBUR JOHNSON.

Decree of Divorce

B No. 17111

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

Frand B. Cae Auditor and Master.

Decree of Divorce

WILBUR JOHNSON	IN THE
-vs- SELINA JOHNSON	Circuit Court
DELITAR CONTROL	OF
CROSS BILL. WSX	Or
SELINA JOHNSON	BALTIMORE CITY
-vs-	
WILBUR JOHNSON	Term, 191 8.
in the cross-bi the above named Complainant be and she is	•
MONII from the Defendant, to the cross-that the original bill of Wilbur Johnsame is hereby dismissed. AND IT IS FURTHER ORDERED that a shall have the guardianship and cust son and Mary E. Johnson, the minor of ceedings mentioned, and that said defendants and that said defendants.	bill, the said Wilbur Johnson; and minson v; Selina Johnson be and the said complainant in the cross-bill tody of Evelyn Johnson, Lilliam Johnsohildren of the parties in the proefendant in the cross-bill shall pay ing from the date of this decree, for minor children, until the further
And it is further Ordered, That the said	defendant to the cross-bill
pay the cost of this proceeding.	Monis & Lope

Serve on Ct. Ct. 5/2 Therewood Ow E. 5306 Ready avz ORDER OF COURT Selvia Johnson

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY.

Wilbur Johnson

21 7,
Ordered by the Circuit Court of Baltimore City this day of . Hebruary 1912
that the defendant appear before this Court in person
on the
if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying
the Order of this Court passed on the
payment of Alimony, purplente the blaintiff.
provided a copy of this Order be served on the said definition
on or before the day of Hebruary , 1921.
611000 PSA
Maknelles MANIA MANIA

non Est Thomas F Mchully. Sheriff. (2m4 (Return), Copy of the within order of Court served on Wilbur Johnson, on the 2 day of march 1921, in the presence of the 200 presence of Harry W. Piley Thomas I'm 'milty A es \$0.50

ГОRM 19 Selvia Johnson

vs.

Wilbert Johnson

IN THE

BALTIMORE CITY

1 2/2 201
Ordered by the Circuit Court of Baltimore City this day of Character May 1922
that the _ Alefeudaut appear before this Court in person,
on the day of (May, 1922, at 10 o'clock A. M., and then and there show cause.
if any he may have, why he should not be punished for contempt of this Honorable Court in not obey-
ing the Order of this Court passed on the 28th day of Chril , 1919, directing the
payment of Alimony, pendente lite, by him to the Plaustiff
provided a copy of this Order be served on the said
on or before the day of April (May, 1922)
Of the stand
Tayober Though Pain assaul of Tond
Man in Court april 28, 1919, and ordered to pay
\$3.00 a week, and to pay \$1.00 a week on dornars of
73.08 a week, and
16 weeks. Du march, 1921 man was mon all
attachment, and ordered to pay \$3.00 a week, and
as much as possible ou arrears.
arrears from april 28,1919 to april 24, 1922 - #290.00
/ · · · · · · · · · · · · · · · · · · ·

Serve on Ct. Ct. ORDER OF COURT

11

Selvia Johnson

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY.

ľ	
21	
Ordered by the Circuit Court of Baltimore City this day of day of	
that the diffusion appear before this Court in person	•
on the	e,
if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying	g
the Order of this Court passed on the	ıe
payment of Alimony, purplente little by him to the plaintiff:	
provided a copy of this Order be served on the said	•
on or before the Quay of Hebruary , 1921.	
\$116 en 6 5. B.	
Make les	
A With a Location	

The aforegoing Order having been returned "Non Est" as appears by this day of March 192/, that the time for showing cause under said Order be extended to the day of day of day of day of and the time for service of a copy of the same be extended to the

erve on	Ct. Ct. $B = \frac{65 - 1}{1949}$
512 GLENWOOD AVE.	SELINA JOHNSON
	VS.
	WILBERT JOHNSON &
	ORDER OF COURT
	Single Country of Coun
	3/4///
	NoB.
	Filed. 5 June 1922 & &
	69

SFLINA JOHNSON

IN THE

CIRCUIT

OF

WILBERT JOHNSON

vs.

BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this

JUNE

192 2

that the

DEFENDANT

appear before this Court in person,

, 19,19, directing the

 $IV_{\text{day of}}$ on the JUNE , 1922, at 10 o'clock A. M., and then and there show cause. if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying the Order of this Court passed on the 28th day of APRIL

payment of Alimony, pendente lite, by him to the.

PLAINTIFF

provided a copy of this Order be served on the said

DEFENDANT

on or before the

day of

JUNE

Payable through P.A.

Man in Court April 28, 1919, and ordered to pay \$3.00 a week, and to pay \$1.00 a week on arrears of 16 weeks. In March, 1921, man was in on an attachment, and ordered to pay \$3.00 a week, and as much as possible on arrears.

Arrears from April 28, 1919 to June 5, 1922----- \$308.00

Serve on

Ct. Ct.

B-____

Selina Johnson

VS

Wilbert Johnson

ORDER OF COURT

No. B.

Filed

192

Selina Johnson

IN THE

CIRCUIT COURT

vs

Wilbert Johnson

BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this 5" 1922 day of that the Defendant appear before this Court in person, 12" day of , 19 27 at 10 o'clock A. M., and then and there show cause. June on the if any he may have, why he should not be punished for contempt of this Honorable Court in not obey-28th day of April ing the Order of this Court passed on the , 19 29, directing the Plaintiff payment of Alimony, pendente lite, by him to the Defendant provided a copy of this Order be served on the said on or before the day of June , 1922.

Garroll T. Bond

Payable through P.A.

Man in Court April 28,1919, and ordered to pay \$3.00 a week, and to pay \$1.00 a week on arrears of 16 weeks. In March,1921 man was in on an attachment, and ordered to pay \$3.00 a week, and as much as possible on arrears.

Arrears from April 28,1919 to June 5,1922 \$308.00

TRIECE. V 1EST. Mulder 3/12/4/ 7/ IN THE CIRCUIT COURT OF BALTIMORE CITY PLAINTIFF'S EXHIBIT EXAMINER No. FILED WITH THE EXAMINER

A. deR. SAPPINGTON EXAMINER 6 22 March 1918

on this tenth day of Baltimon Wilbert Johnson of Baltimon City.

Miss Selena Wilson of Bovarestown md. on Simolay - the teach dayof a.D. Nineteen Hundred The residence of Mr & Mrs Wilson. Of Ballimore County in accordance with the Saws of Maryland Dated January this 10th dayof 1 Per, James & Fry. Mrs Johnson Mr. Ed Mrs Wilson