

B313
1921 In the
Circuit Court No 2
Baltimore City

Walter Jones

vs

Georganna Jones

Bill for a Divorce
a Vinculo Matrimonii
from defendant

Mr Clerk -
Please file etc

W. Grant Tyler,
Sol for Plaintiff

No 20616 B
1

July 16 1921

4.

That there are no children born as a result of their marriage.

5.

That the defendant is not in the army or naval services of the United State Government.

To the end therefore, your petitioner, prays this Honorable Court to grant him:-----

- (A). A divorce a vinculo Matrimonii from the defendant:--
- (B). And the Writ of subpoena, directed to to defendant at 1410 Division Street, Baltimore City, commanding the defendant to be and appear in this Honorable Court, some day certain named therein, to answer the bill of complaint herein.
- (C). And such other and further relief as in equity the case may require.

(D).

And as in duty bound etc.,

U. Grant Tyler

Solicitor for Plaintiff.

474

Ct. Ct. No. 2

313
1921

Docket No. 3

Jones

vs.

Jones

Subpoena to Answer Bill of Complaint

Pro

No. 20616 B
2

Copy-typed

Filed 25 July 1921

J. Grant Tyler

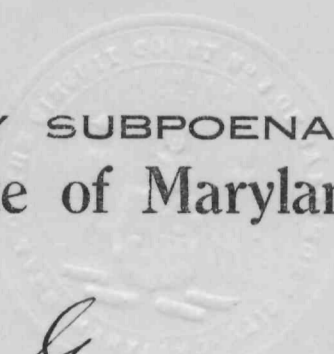
Solicitor.

11

Summons and a copy of the process left
with the defendant -

Thomas W. McKeeth
Sheriff

(-Attach) 7/19/21
Len # 80



EQUITY SUBPOENA
The State of Maryland

To

Georganna Jones
1410 Linicum St

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 *August*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Walter Jones

against you exhibited in the CIRCUIT COURT NO. 2 OF BALTIMORE CITY.

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 *11* day of *July*, 192*1*

Issued the *16* day of *July*, in the year 192*1*
John Pleasant
Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

13213/1921
Inherent Court No 2

Walter Jones

5

George Jones

Amos Reed Campbell

Mr. John Jones

[Signature]

No 20616 B

3

DAVIS & BISHOP
ATTORNEYS AT LAW
BANNEKER BUILDING
14 E. PLEASANT STREET
BALTIMORE, MD.

Ad. 6 August 1921

[Handwritten note]

Walter Jones

In The Circuit Court No.2

vs.

of

Georgeanna Jones

Baltimore City.

To The Honorable, The Judge of Said Court:

The defendant answers the above case in your Honorable Court exhibited respectfully says:

FIRST, that she admits the first, third, fourth and fifth paragraphs of the plaintiff Bill of complaint.

SECOND, that she denies emphatically the second paragraph and insists upon the strictest legal proof thereon.

THIRD, That the defendant is without means to defray the expenses of this litigation and that the plaintiff is employed as a waiter making approximately forty (\$40.00 dollars a week. That ~~your oratrix~~^{the} or defendant has been advised by counsel that she is entitled to have an order passed by this Honorable Court awarding her a sum certain as alimony during the progress of this suit and a further sum to compensate her solicitor for his services in the cause.

WHEREFORE YOUR ORATRIX PRAYS:

a-a that an order be passed allowing her alimony Pendite Lite, a counsel fee in sum as this Honorable Court may think just and proper.

Georgeanna Jones
Complainant

[Signature]
Attorney For Complainant.

State of Maryland)
Baltimore City) To Wit

I hereby certify that on this 5th day of August, 1921, before me the subscriber, A Notary Public in and for Baltimore City, State of Maryland, personally appeared *Georgeanna Jones* the complainant in the foregoing bill and made oath in due form of law that the matter contained in the same was true to the best of her knowledge and belief.

Caroline Murray
NOTARY PUBLIC.



Same as
Walter Jones.
525 N Lafayette Ave

B Docket 3/3/1921

CIRCUIT COURT No. 2

Jones
vs.
Jones

Order Counsel Fee and Alimony.
Pendente Lite
Husband Plaintiff

ORDER 8 August 1921

No. 20616 B.

(H.)

Copy Kept

Filed 8 August 1921

10

Thomas G. McWhorter
S. Sheriff
An Ent
(Kelly)

CIRCUIT COURT No. 2
BALTIMORE CITY

Walter Jones

vs.

Georgeanna Jones

IN THE

CIRCUIT COURT No 2

OF

BALTIMORE CITY

July

TERM, 1921

ORDERED BY THE COURT, this 8 day of August 1921

that the Plaintiff Walter Jones

pay to the Defendant Georgeanna Jones

the sum of twenty five Dollars as Counsel Fee for the

Solicitor of the Defendant, and that he further pay the sum of thirteen

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

Georgeanna Jones

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 24

day of August 1921, provided a copy of this Order be served on the said Plaintiff

Walter Jones on or before the 13

day of August 1921

Walter T. Dunsin

TRUE COPY—TEST:

\$40. per week
70 cheques

Clerk.

B Docket 313
1921

CIRCUIT COURT No. 2

Jones
vs.
Jones

Order Counsel Fee and Alimony.
Pendente Lite
Husband Plaintiff

ORDER
No. Copy B.
()

Filed 191

Walter Jones
vs.
Georganna Jones

IN THE
CIRCUIT COURT No 2
OF
BALTIMORE CITY

July TERM, 1921

ORDERED BY THE COURT, this 8- day of August 1921

that the Plaintiff Walter Jones
pay to the Defendant Georganna Jones
the sum of, twenty five Dollars as Counsel Fee for the
Solicitor of the Defendant, and that he further pay the sum of thirteen
Dollars per week, during the continuance of this suit, to the said Defendant

Georganna Jones
as Alimony, pendente lite, unless cause to the contrary be shown on or before the 24-

day of August 1921, provided a copy of this Order be served on the said Plaintiff

Walter Jones on or before the 13-

day of August 1921

Walter F. Dawkins

TRUE COPY—TEST:

John Pleasant

Clerk.

Circuit Court No. 2

B 3/3 30
1921

Docket.....

Walter Jones

vs.

George Anna Jones

Saff

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

No. 20616 B
15

Filed 19 August 1921

.....
Walter Jones
.....

vs.

.....
George-Anna Jones
.....

IN THE
Circuit Court No. 2,
OF
BALTIMORE CITY.

**To the Honorable the Judge of the
Circuit Court No. 2 of Baltimore City:**

THE PETITION OF..... *Walter Jones, plaintiff*

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

W. Grant Tyler
Solicitor for *plaintiff*

ORDERED, this..... *19th*..... day of..... *August*..... 19*21*., 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.

H. Arthur Plump

2/17/34

Doc. 3 313
1921

In the Circuit Court, #2.
OF BALTIMORE CITY

DEPOSITIONS

Walter Jones

vs.

Georgiana Jones

No. 20616
61

PLAINTIFF'S COSTS

Examiners \$ 8⁰⁰
Copies
Sheriff
Stenographer 1⁰⁰
\$ _____

DEFENDANT'S COSTS

Examiners \$
Copies
Sheriff

Walter Jones

vs.

Georganna Jones

In the Circuit Court # 2

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 *mineteenth* day of *August* 19*21*, met on the *twenty-third* day of *August* in the year nineteen hundred and *twenty-one* at my office, in the City of Baltimore, in the State of Maryland, and assigned the *twenty-fourth* day of *August* in the same year at *four* o'clock in the *after* - noon and the office of *M. Grant Tyler, 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:—

Walter Jones,

v.

Georgeanna Jones.

Testimony taken at the office of U. Grant Tyler, Esq., Pleasant Street, Baltimore, Maryland, August 24th. 1921, at 4 o'clock P. M.

WALTER JONES, the Plaintiff in this case, produced on his own behalf, having been first duly sworn, deposeseth and saithaas follows, that is to say:

BY THE EXAMINER:

1 Q. State your name residence and occupation?

A. Walter Jones, 525 W. Lafayette Avenue; qaiter.

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

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

BY MR. TYLER:

1 Q. When, where and by whom were you and your wife married?

A. We were married by the Reverend Mr. John Holmes, March 1898.

2 Q. On what day in March?

A. I think it was about Thursday, I think.

3 Q. The Bill says about the 3rd. March, is that right?

A. Yes; 3rd. March; that is right.

4 Q. Of what Church was the Reverend Mr. Holmes Pastor at that time?

A. The Metropolitan M. E. Church.

5 Q. Are you and your wife still living together?

A. No sir.

6 Q. Which one left the other.

Walter Jones.

- A. My wife left me
- 7 Q. About when did that occur?
- A. That occurred about 1901.
- 8 Q. The Bill says that it was June 3rd., 1902?
- A. About 1901, I think it was.
- 9 Q. About what month?
- A. Well, I just dont remember.
- 10 Q. The Bill says june,- Was it in the month of June.
- A. Yes; that was about the time.
- 11 Q. Now, state the circumstances surrounding your wife's abandoning you?
- A. Well, my wife was a woman that kept undesirable company,- female company, and I knew these girls, and I knew that they were not fit company, and I spoke to jher about it, andshe got very angry ofer it.
- 12 Q. She got mad?
- A. She got mad and went off.
- 13 Q. Did you do your duty as a good husband shouldhave done towards your wife?
- A. Yes; I did.
- 14 Q. Did you beat or ill treat her?
- A. No sir.
- 15 Q. Did you pro vide for her as best your means

Waltee Jones.

A. Yes.

16 Q. And did you give her a good comfortable home and the necessities of life?

A. Yes.

17 Q. Before you filed your Bill for Divorce, did you attempt to affect a reconciliation with your wife?

A. Yes; I went to see her.

18 Q. State what she said?

A. She said that she was satisfied where she was and the company that she was with and did not wish to return.

19 Q. Did you at any time for three years prior to the 16th., of July 1921, - live or cohabit with your wife?

A. No sir.

20 Q. Was the abandonment deliberate, continuous and uninterrupted and final for three years prior to the filing of this Bill for Divorce?

A. Yes.

21 Q. About how long has it been?

A. It has been about seventeen years.

22 Q. Is there any hope of a reconciliation between you and your wife?

A. No.

Walter Jones.

23 Q. Why do you say that there is no hope of a reconciliation between you and your wife?

A. Because I went to see her, and, as I stated, she said that she was satisfied where she was and did not want to return.

24 Q. Are there any children as the result of this marriage between you and she?

A. No sir.

26 Q. How long have you lived in Baltimore, Maryland?

A. About twenty-five years.

27 Q. Is your wife in the Army or Naval Service of the United States Government?

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.---

no
Walter Jones

WALTER MIDDLETON, 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. Walter Middleton, 1425 Argyle Avenue; laborer -
I work for the United Railways Company.

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

A. Yes.

BY MR. TYLER:

1 Q. Were you present at the marriage?

A. No sir; I was not present at the marriage.

2 Q. Did they live together as husband and wife and were they so received among their friends and acquaintances as husband and wife and in society.

A. They really did for awhile, sir.

3 Q. Are they still living together?

A. No sir.

4 Q. Which one left the other?

A. She left ^him.

5 Q. State how you know that?

A. Because she kept rather bad company, - real bad company around the house, and she did not provide as a wife at all.

Walter Middleton.

6 Q. Now, after she left the house and went away, did you go around to the house and if you did what did you find.

A. I did not exactly go that day, but in a couple of days or so afterwards; it may have been a week before I went there, before I was around there again, and she was gone, and she said that she did not want to stay there and she was going to leave.

7 Q. Had she told you that.

A. No sir; he told me that and then I went to the house and found that she was gone.

8 Q. What was Mr. Jones' conduct towards his wife; was it that of a good and faithful husband.

A. A good and faithful husband; that I know.

9 Q. Did he provide her with a comfortable home and the necessities of life - for his wife, as best his circumstances would permit him to do?

A. As best his ability would allow him, sir, he did.

10 Q. Did you know Mr. Jones well, and how long; - if so, how well and how long.

A. I have known Mr. Jones since he was a young man, - twenty-five years.

11 Q. Is he of a kind and gentle disposition?

A. I have always found him so.

Walter Middleton.

12 Q. Would he offend anybody, particularly his wife, for whom he cared?

A. No sir.

13 Q. Did his wife ever speak to you of her husband as being a good and faithful husband?

A. She did.

14 Q. Do you think that there is any hope of a reconciliation between the parties to this suit?

A. No sir.

15 Q. Why do you say that there is no hope of a reconciliation between them.

A. She is not a character of that kind, sir; she is not a woman worthy of a husband.

16 Q. Has Mr. Jones and his wife either lived or cohabited together for a period of three years prior to the 16th., day of July 1921?

A. No sir; they have not.

17 Q. Now, had they lived together, you would have known it.

A. Yes, I would. I was a personal friend of them.

18 Q. And you say that they have not?

A. No sir; they have not been together.

Walter Middleton.

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

A. No sir.

20 Q. How long, to your knowledge, has the Plaintiff, Mr. Jones, lived in Baltimore City, State of Maryland?

A. About twenty-five years.

21 Q. Is his wife in the Army or the Naval Service of the United States Government?

A. Not to my knowledge, 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.---

Walter, Midkleton

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 14 13th day of September in the year of Our Lord nineteen hundred and twenty-one at the City of Baltimore, in the State of Maryland.

A. de Russy Sappington (SEAL).
Examiner.

There are no Exhibits with these depositions, to wit:

Plaintiff's Exhibit /

Defendant's Exhibit /

A. de Russy 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 now by the Defendant _____

A. de Russy Sappington
Examiner.

In the ^{B 313/1921}
Circuit Court
No 2 of
Baltimore City

Walter Jones
vs
Georganna Jones

Agreement ^{Fees}
Counsel ^{Costs}
Alimony and
Counsel ^{Free}

Mr. Clerk
Please file etc

U. Grant Tyler
Sol for Plaintiff
No 20616 B
7

This agreement made this 24th day of August, in the
year of our Lord one thousand nine hundred and ~~nineteen~~ *Twenty one*
between J. Stewart davis, Solicitor for Georgeanna Jones
and U. GRANT TYLER, Solicitor for Walter Jones, plaintiff,
in a divorce case in Circuit Court No. 2. of Baltimore City,
that a lump sum be given and taken in lieu of Alimony and
Counsel fee; The same being done with the full knowledge and
consent of our respective clients in this cause.

IT IS FURTHER AGREED that this AGREEMENT BE MADE A
part of the proceedings of this cause.

GIVEN UNDER OUR HANDS AND SEALS, THIS 24th., DAY
of AUGUST, IN THE YEAR OF OUR LORD, ONE THOUSAND NINETEEN
HUNDRED AND ~~NINETEEN~~ *Twenty one.*

U. Grant Tyler
Solicitor for Complainant. (SEALS).

C. Stewart Davis
Solicitor for Defendant (SEALS).

313
1921

Cir. Ct. No. 2.
Docket No. _____

Walter Jones
vs.

Georgiana Jones

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file,

W. Grant Tyler
Solicitor for Plaintiff.

No. 20616 B
8

Filed 23 September 1921

Walter Jones
vs.

George Anna Jones

In the Circuit Court No. 2
Of Baltimore City.

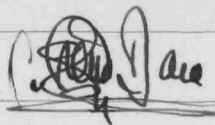
TERM 19~~21~~

To the Honorable

Judge of Said Court:

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

U. Grant Tyler
Solicitor for Plaintiff.



Solicitor for Defendant,

313
1921

B

St. Ct. No. 2

Docket No. 3

Walter Jones

VS.

Georgina Jones

Order of Reference
and Report

Loae

No. 20616 B.
9-10

Order Filed 23 day of Sept 1921
Report Filed 24 day of Sept 1921

Walter Jones

VS.

Georganna Jones

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

September Term, 1921

This case being submitted, without argument, it is ordered by the Court, this 23
day of September, 1921, that the same be and it is hereby referred to
Ward B. Cus, Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.

H. Arthur Plump

Report of Auditor and Master

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

Defendant summoned and answers by solicitor.

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

The marriage proven.

The abandonment for three years, its finality and the irre-
concilability of the parties proven.

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

Case submitted and ready for decree.

Ward B. Cus
Auditor and Master.

Fee \$9 paid.

September 23rd, 1921.

Circuit Court No. 2

-313-

1921. B No. 30 Docket

WALTER JONES

vs.

GEORGEANNA JONES

DECREE OF DIVORCE.

29 September 1921

No. 616 B. R.

Copy 11. copied

Filed 29 September 1921

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

Mund B. Cole
Auditor and Master.

IN THE

WALTER JONES

Circuit Court No. 2

VS.

OF

BALTIMORE CITY.

GEORGEANNA JONES

September TERM, 1921.

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

It is thereupon, this 29th day of September, Anno Domini, one thousand nine hundred and twenty-one by the CIRCUIT COURT No. 2 OF BALTIMORE CITY, Adjudged, Ordered and Decreed, that the said Walter Jones

the above named complainant be, and he is hereby DIVORCED A VINCULO MATRIMONII, from the defendant., the said Georgeanna Jones.

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

H. Arthur Plumptre

I, JOHN PLEASANTS, Clerk of the Circuit Court No. 2 of Baltimore City, do hereby certify that the above is a true copy of the decree taken from the record of proceedings in said cause.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of the said Court, this day of 1921