3/21/3/21

In the Circuit Court
for Baltimore City

394

Della Keys 1920

vs

Henry Webster Keys

Bill for Divorce a Vinculo

Mr Clerk please file

Davis & Bishop
Solicitors for Plaintiff

B21230

10 Subs 1920
" 12 "

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

COMMERCIAL PRINTING & STATIONERY CO.

Della Keys — In The Circuit Court

vs. — of

Henry Webster Keys — Baltimore City.

To The Honorable, The Judge of Said Court:

Your Oratrix complaining respectfully says:

FIRST, That the parties hereto were married on or about the 7th. of September, 1903 in Baltimore City, by Rev. John Hurst. and lived together as man and wife until on or about December 7th.1910.

SECOND, That Your Oratrix is a resident of the city of Baltimore, state of Maryland, and has been for more than two years prior to the filing of this bill of complaint. That the respondent is a non-resident of the city of Baltimore, and when last heard of was in Philadelphia Pa.

THIRD, That though the conduct of Your Oratrix towards her husband has always been kind, affectionate and above reproach the respondent without any just cause or reason, abandoned your Oratrix and said abandonment hass continued uninterruptedly for more than three years prior to the filing of this bill of complaint. He has upon divers times and occasions committed adultery with lewd and abandoned women whose names are unknown to your Oratrix.

FOURTH, That Your Oratrix has never condoned said offenses of desertion and adultery.

FIFTH, There were fourcmchildren born as a result of their marriage, of which three survive, Carrie, 14yrs. Romey, 11yrs. William 10yrs.

WHEREFORE YOUR ORATRIX PRAYS:

a-a A divorce a vinculo matrimonnii from the respondent.

b-b The care and custody of her three children.

c-c Resumption of her maiden name, Della Johnson.

d-d Such other and further releif as the case may require

WHEREFORE YOUR ORATRIX PRAYS:

That a decree be passed, divorcing Your Oratrix from the respondent, a vinculo matrimonnii.

May it please Your Honor, to grant unto

Your Oratrix, an order of publication, setting forth the nature and substance of this bill and warning the said defendant to be in this Court in person or appear by solicitor on or before a certain day to be therein named and show cause, if any he may have why a decree should not be passed as prayed.

× Della Keys.

Davis + Bishop
Solicitors for Plaintiff

As in duty Bound etc.

State of Maryland)
) To Wit:
Baltimore City)

I hereby certify that on this 9th day of July 1920, before me the subscriber, a notary public, of the State of Maryland, in and for the city of Baltimore, personally appeared Della Keys, the petitioner, in the foregoing proceedings, and made oath in due form of law, that the matter contained therein is true to the best of her knowledge and beleif.

As witness my hand and Seal.

Arthur M. Rogers
Notary Public.

Davis & Bishop, Solicitors,

II8 E.Lexington St.

In The Circuit Court of Baltimore City.

Della Keys vs. Henry Webster Keys.

ORDER OF PUBLICATION.

The object of this suit is to procure a decree for a divorce A VINCULO MATRIMONNII, by the plaintiff from the defendant.

The Bill states that the parties thereto were married in Baltimore, Md. September 7th. I903, By Rev. John Hurst; and lived together as man and wife until on or about December 7th. I9I0. That the plaintiff is a resident of the city of Baltimore, state of Maryland and has been for more than two years prior to the filing of this bill of complaint. That the defendant is a non-resident of this city and state, and when last heard of was in Philadelphia Pa. That though the conduct of the plaintiff towards her husband was always kind and affectionate and above reproach, he, without just cause or reason abandoned her and has declared his intentions not to live with her any longer; and that the abandonment has continued uninterrupted for more than three years prior to the filing of this bill of complaint; and the separation of the parties ~~are~~ is beyond any reasonable hope or expectation of reconciliation. That ~~three~~ there are four children as a result of said marriage, of which three survive.

It is thereupon by the Circuit Court of Baltimore City, ordered this 12th day of July, I920. That the plaintiff by causing a copy of this order to be inserted in some daily newspaper, published in the city of Baltimore, once a week for four successive weeks, before the 15th day of August, I920; and give notice to the said defendant, Henry Webster Keys (Now absent) of the object and substance of this bill and warning him to be and appear in this court in person or by solicitor, on or before the 28th day of August I920 to show cause if any he may have, why a decree should not be passed as prayed.

Robert F. Stanton

192 0 344 Docket No. .....

Keys

vs.

Keys

Certificate of Publication

B 21230
(3)

THE DAILY RECORD.

Filed 11 day of Sept 192 0

THE DAILY RECORD

(17)

Davis & Bishop, Solicitors,
118 E. Lexington St.

IN THE CIRCUIT COURT OF BALTIMORE CITY — (B—394—1920) — Della Keys vs. Henry Webster Keys.

ORDER OF PUBLICATION.

The object of this suit is to procure a decree for a divorce a vinculo matrimonii by the plaintiff from the defendant.

The bill states that the parties thereto were married in Baltimore, Md., September 7th, 1903, by Rev. John Hurst, and lived together as man and wife until on or about December 7th, 1910. That the plaintiff is a resident of the City of Baltimore, State of Maryland, and has been for more than two years prior to the filing of this bill of complaint. That the defendant is a non-resident of this City and State, and when last heard of was in Philadelphia, Pa. That though the conduct of the plaintiff towards her husband was always kind and affectionate and above reproach, he, without just cause or reason, abandoned her, and has declared his intentions not to live with her any longer; and that the abandonment has continued uninterrupted for more than three years prior to the filing of this bill of complaint; and the separation of the parties is beyond any reasonable hope or expectation of reconciliation. That there are four children as a result of said marriage, of which three survive.

It is thereupon, by the Circuit Court of Baltimore City, ordered, this 12th day of July, 1920, that the plaintiff by causing a copy of this order to be inserted in some daily newspaper, published in the City of Baltimore, once a week for four successive weeks, before the 12th day of August, 1920, and give notice to the said defendant, Henry Webster Keys (now absent), of the object and substance of this bill, and warning him to be and appear in this Court, in person or by solicitor, on or before the 28th day of August, 1920, to show cause, if any, he may have, why a decree should not be passed as prayed.

ROBERT F. STANTON.

True copy—Test:

CHAS. R. WHITEFORD,
Clerk.

jy13,20,27au3

Baltimore, AUG 3 - 1920, 192

We hereby certify that the annexed advertisement of Order Publication Circuit Court ——— of Baltimore City, Case of ———

Della Keys

vs. Henry Webster Keys

was published in THE DAILY RECORD, a daily newspaper published in the City of Baltimore, once in each of four successive weeks before the 12th day of August, 1920

First insertion July 13th, 1920

THE DAILY RECORD.

Per Howard I. Appish Jr.

450

394 Alex Docket Ct. Ct.

Della Keys

vs.

Henry Webster Keys

Decree Pro Confesso.

B 21230

No. (4)

Filed 11 Sept 1920

[Decree Pro Confesso.]

Della Keys

vs.

Henry Webster Keys

IN THE

Circuit Court

OF

BALTIMORE CITY.

July Term, 1920

The Defendant having been duly ~~summoned~~ (notified by Order of Publication) to appear to the Bill of Complaint, and having failed to appear thereto, according to the exigency of the ~~writ~~ (said Order).

It is thereupon this 11th day of September in the year nineteen hundred and twenty by the Circuit Court of Baltimore City, ADJUDGED, ORDERED and DECREED, that the complainant is entitled to relief in the premises, and that the bill of Complaint be and is hereby taken pro confesso against said defendant. But because it doth not certainly appear to what relief the Plaintiff is entitled, it is further *Adjudged*, and *Ordered*, that one of the Examiners of this Court, take testimony to support the allegations of the bill.

John J. Dobler

STATE OF MARYLAND,

BALTIMORE CITY, SCT:

I hereby certify that on this 20th day of August 1920 before me, the subscriber, a Notary Public, of the State of Maryland, in and for the City aforesaid, personally appeared Della Keys and made oath in due form of law that her (~~his~~) husband (~~wife~~) the defendant in the above entitled case is not in the Military or Naval service of the United States Government, to the best of her (his) knowledge, information and belief.

As Witness my hand and Notarial Seal.

Arthur M. Rogers.

Notary Public.

Della Keys.

Doc. B 394 1920

In the Circuit Court,

OF BALTIMORE CITY

DEPOSITIONS

Della Keys

vs.

Henry Webster Keys

No. 21230 B

PLAINTIFF'S COSTS

Examiners	$ 5 00
Copies	
Sheriff	
Stenographer	1 00
	$

DEFENDANT'S COSTS

Examiners	$
Copies	
Sheriff	
Stenographer	
	$

fd 27 Oct 1920

Della Keys

vs.

Henry Webster Keys

In the Circuit Court

OF BALTIMORE CITY.

Decree Pro Confesso having been passed in said cause and notice having been given me by the Solicitor for the plaintiff of a desire to take testimony in the same, I, A. de RUSSY SAPPINGTON, one of the Standing Examiners of the Circuit Courts of Baltimore City, under and by virtue of an order of the above named Circuit Court, passed in said cause on the eleventh day of September 1920, met on the twenty-second day of September in the year nineteen hundred and twenty at my office, in the City of Baltimore, in the State of Maryland, and assigned the twenty-third day of September in the same year at four o'clock in the after- noon and the office of Messrs. Davis & Bishop, in the City and State aforesaid, as the time and place for such examination of witnesses in said cause; at which last mentioned time and place I attended, due notice of such meeting having been given, and proceeded in the presence of the Solicitor of the plaintiff to take the following depositions, that is to say:—

8-113

KEYS

vs.

KEYS.

Testimony taken at the office of Messrs. Davis & Bishop, 118 East Lexington Street, Baltimore, Maryland, September 23, 1920, at four o'clock p. m.

DELLA KEYS,

the plaintiff, produced in her own behalf, having been first duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

1Q. (By the Examiner) State your name, residence and occupation.

A. Della Keys, 507 North Barnes Street; presser.

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

A. Yes, I am the plaintiff and my husband is the defendant.

3Q. (By Mr. Davis) When were you married?

A. I have been married since the 7th of September, 1903.

4Q. Where?

A. In Baltimore.

5Q. Baltimore City, State of Maryland?

A. Yes.

6Q. By whom?

A. The Rev. Mr. John Hurst.

7Q. A minister of the Gospel?

A. Yes.

8Q. Did you live with your husband as husband and wife after that?

A. Yes.

9Q. Until when?

A. Until ten years ago.

10Q. What date?

A. December 7, 1910.

11Q. Now you were separated on that day; did he leave?

A. Yes, he left me with three children.

12Q. Where did he go?

A. He did not go right away; he lived a street from me in the 1700 block.

13Q. Whom did he live with up there?

A. A girl by the name of Ella Cook.

14Q. That was December 7, 1910?

A. Yes.

15Q. How long did he live there?

A. I can not tell you how long he lived there.

16Q. He moved from there and went to Philadelphia?

A. Yes, and he has been in Philadelphia ever since.

17Q. Did you give him any cause to go?

A. No, sir, none at all. With all those children and an infant baby?

18Q. Were you always kind and affectionate?

A. Yes.

19Q. And was your conduct above reproach?

A. Yes.

20Q. And were you a faithful wife?

A. Yes, I have been both of that; I have proof of that.

21Q. And have his desertion and abandonment of you continued uninterruptedly for more than three years prior to July 10, 1920?

A. Yes; oh, my, yes; ten years.

Della Keys.

22Q. Have you ever forgiven or condoned his offense of desertion; have you ever forgiven him?

A. No, sir, I have not forgiven him.

23Q. Have you ever lived or cohabited with him since then?

A. No, sir.

24Q. Is there any chance or hope of a reconciliation?

A. No, sir, not any.

25Q. There are four children of this marriage?

A. Yes.

26Q. Three of them are living?

A. Yes.

27Q. Carrie, fourteen; Romey eleven; William, ten years old?

A. Yes.

28Q. Do you want the care and custody of your children?

A. Yes.

29Q. You want the Court to order him to pay some money for their support?

A. Yes.

30Q. You want to resume your maiden name of Johnson?

A. Yes.

31Q. Have you been a resident of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit?

A. Yes.

32Q. How long have you lived in Baltimore?

A. All my life.

33Q. Your husband is a non-resident of Baltimore City and has been a non-resident of the City of Baltimore ever since he left you?

A. Yes, he is a non-resident.

34Q. And he was last heard of where?

A. In Philadelphia.

35Q. How long has he been a non-resident of the State of Maryland?

A. He has been living in Philadelphia about eight years.

36Q. Has he ever supported you since he left you?

A. No, sir, not a bit.

37Q. State whether or not said abandonment has continued uninterruptedly for at least three years prior to the filing

of this suit?

A. Yes.

38Q. State whether or not said abandonment was deliberate and final?

A. Yes.

39Q. State whether there is any reasonable expectation of a reconciliation?

A. No, sir, there is not.

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 Della Keyes.

SARAH ASKINS,

a witness of lawful age, produced on behalf of the plaintiff, having been first duly sworn, was examined and testified as follows:

DIRECT EXAMINATION

1Q. (By the Examiner) State your name, residence and occupation.

A. Sarah Askins; 522 North Eden Street, laundress.

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

A. Yes, and I am acquainted with her husband.

3Q. (By Mr. Davis) They are husband and wife?

A. Yes.

4Q. Where did they live together as husband and wife?

A. I think it was on Monument Street---Spring Street.

5Q. Did you visit them while there?

A. Yes, quite often.

6Q. You visited them there as husband and wife?

A. Yes.

7Q. Did he hold her out as husband and wife?

A. Yes.

8Q. Was their reputation in the community that of husband

and wife?

A. Yes.

9Q. You know that they were husband and wife?

A. Yes.

10Q. And were you present at the wedding?

A. No, sir.

11Q. They lived together as husband and wife until on or about December 7, 1910?

A. Yes.

12Q. You know that, do you?

A. Yes.

13Q. What caused the separation, and which left the other?

A. He left her.

14Q. Did you visit the house after he left her?

A. Yes.

15Q. And found that he was gone?

A. Yes.

16Q. And she was still keeping house there with her three children?

A. Yes.

17Q. Do you know why he left her?

Sarah Askins.

A. Well, for that other woman.

18Q. Then he went to live with another woman?

A. Yes.

19Q. Do you know her name?

A. Yes, I know her name was Ella Cook; I know her well.

20Q. He lived where with her?

A. I think it was on Dalls Street.

21Q. He lived there with this woman as husband and wife?

A. Yes.

22Q. You know that?

A. Yes, I do.

23Q. What was the conduct of the plaintiff toward her husband; was she a good and kind and faithful wife?

A. Yes; she has been all of that.

24Q. Did she give her husband any cause to leave her?

A. None at all.

25Q. Has the separation continued uninterruptedly for more than three years prior to the filing of this suit?

A. Yes.

Sarah Askins.

26Q. For more than ten years?

A. Yes.

27q. Is there any hope of their making up?

A. No, sir.

28Q. No chance of their making up?

A. No, sir, I don't think so.

29Q. Has she lived or cohabited with him since he left her?

A. No, sir.

30Q. Has she ever condoned or forgiven him?

A. No, sir.

31Q. There are three children living as the result of this marriage?

A. Yes, I know them well.

32Q. Has the plaintiff been a resident of Baltimore City, State of Maryland for more than three years prior to the filing of this suit?

A. Yes; ever since I have known her.

33Q. How long have you known her?

A. Over fifteen years.

34Q. And she has been a resident of Baltimore City all

that time?

A. Yes.

35Q. Prior to the date of the filing of this bill, was he a resident of the State of Maryland?

A. No, non-resident.

36Q. And he was living at that time where?

A. In Philadelphia.

37Q. He went to Philadelphia soon after he left his wife?

A. Yes, in the neighborhood of two years afterward.

38Q. And he has been living there ever since?

A. Yes, with this Ella Cook; she went away with him.

39Q. Ella Cook went away with him, did she?

A. Yes, I know her well.

40Q. State whether or not said abandonment has continued uninterruptedly for at least three years prior to the filing of this suit?

A. Yes.

41Q. State whether or not said abandonment was deliberate and final?

A. Yes.

Sarah Askins.

42Q. And you would say that there is no reasonable expectation of a reconciliation?

A. No, there is not.

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.---

Sarah M askins

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 26 day of October
in the year of Our Lord nineteen hundred and Twenty at the City of Baltimore, in the State of Maryland.

A. de Sappington (SEAL).
Examiner.

There are Ns Exhibits with these depositions, to wit:

Plaintiff's Exhibit \

Defendant's Exhibit \

A. de 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 work of which I was employed by the Plaintiff....., and on none by the Defendant.....

A. de Sappington
Examiner.

Circuit Court

594 Bleo

19 20 Docket No.

Keys

vs.

Keys

Order of Reference and Report

Robertson

B 21230

No

(b)

Order Filed 27 day of Oct 19 20

Report Filed 3 day of Nov 19 20

Della Keyes

vs.

Henry W. Keyes

IN THE

Circuit Court

OF

BALTIMORE CITY

Sept Term, 19 27

This case being submitted without argument, it is ordered by the Court, this 27 day of Octobr, 19 27, that the same be and it is hereby referred to Alex H Robertson, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Robert F. Stanton

Report of Auditor and Master

Bill pltd by wife against husband
pet a divorce a Vinculo matrimonii
for abandonment for three years
and adultery, and for custody of
minor children Code Art. 16. S. 36
Order of publication against
defendant as a non resident on
appearance docket ma awaiting thirty
days elapsed. Proof shows married
residence of plaintiff non residence
of defendant abandonment by
plaintiff for three years and adultery
The minor children live awarded
plaintiff. Plaintiff to resume her
maiden name
Case ready for decree

Alex H Robertson
Aud & Master

CIRCUIT COURT

B 394 1920
No. Docket

Della Keyes

VS.

Henry Webster Keyes.

Decree of Divorce

B No. 21230

Fd 3 Nov 1920

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

Auditor and Master.

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

Della Keyes

VS.

Henry Webster Keyes

September Term, 1920.

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

It is thereupon, this third day of November, A. D. 1920. by the Circuit Court of Baltimore City, **Adjudged, Ordered and Decreed,** that the said Della Keyes the above named Complainant be and she is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, Henry Webster Keyes; and that the three minor children, Carrie, Romey and William Keyes, be awarded the plaintiff; and that the plaintiff be permitted to resume her maiden name the said name being Della Johnson

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

Robert F. Stanton

FORM 4—5M—1-1-19.