IN THE CIRCUIT COURT OF

BALTIMORE CITY

LILLIAN G.WILLIAMS

VS.

ROBERT WILLIAMS

BILL FOR DIVORCE

Mr.Clerk:-

Please file,

which has a second

Davis Evaus
ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS

Fd 5 Feb 1927

BAUMGARTEN & CO., INC.

IN THE CIRCUIT COURT

LILLIAN G.WILLIAMS

VS.

:

:

OF

ROBERT WILLIAMS

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully says:

- I. That she was married to her husband, Robert Williams on the 2nd day of August, I924 and with whom she resided until the 3rd day of June, I925 when the defendant deserted the plaintiff.
- 2. That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said defendant.
- That the said Robert Williams has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned women, whose names are unknown to your Oratrix and said offense has not been condoned by your Oratrix.
- 4. That your Oratrix has not lived or co-habited with the said defendant since sheddiscovered his said adulteries.
- 5. That there are no children born as result of said marriage.
- 6. That your Oratrix is a citizen of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this bill of complaint, but that the defendant is a non-resident of the State of Maryland and when last heard of was in Middlesex County, Virginia.

TO THE END, THEREFORE:

- (a) That your Oratrix may be divorced A Vinculo Matrimonii from the said Robert Williams.
- (b) That she may resume her maiden name THOMPSON.
- (c) That she may have such other and further relief as her case may require.

May it please your Honorito grant unto your Oratrix the Order of Publication directed against the said Robert Williams, commanding and requiring him to be and appear in this Court on some day certain to be named therein to answer the premises and abide by and perform such decree or order as may be passed therein.

AND as in duty bound, etc.

Solicitors for Plaintiff.

DAVIS & EVANS, SOLICITORS 215 ST.PAUL PLACE IN THE CIRCUIT COURT OF BALTIMORE CITY LILLIAN G.WILLIAMS VS_ROBERT WILLIAMS

ORDER OF PUBLICATION

The object of this bill is to procure a divorce A Vinculo Matrimonii by the plaintiff, Lilaian G. Williams, from the defendant, Robert Williams.

The bill recites that the parties were married on the 2nd day of August, 1924 and lived together until the 3rd day of June, 1925. That ever since said marriage the Oratrix has bahaved herself as a faithful, chaste and affectionate wife toward the said defendant. That the said defendant has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned women, whose names are unknown to your Oratrix and said offense has notbeen condoned by your Oratrix. That your Oratrix has not lived or co-habited with said defendant since she discovered said adulteries. That there are no children born as result of said marriage. That your Oratrix is a citizen of the Stateof Maryland but the defendant a non-resident of the State of Maryland and when last heard of was in Middlesex County, Virginia.

192	Docket N	, 61 1927 U
<u>U</u>	vs. Hai	UL)

Certificate of Publication

B 31477

THE DAILY RECORD

Davis & Evans, Solicitors. 215 St. Paul Place. IN THE CIRCUIT COURT OF BALTI-MORE CITY-(B-61-1927)-Lillian G.

Williams vs. Robert Williams.

ORDER OF PUBLICATION.

The object of this bill is to procure a divorce a vinculo matrimonii by the plaintiff, Lillian G. Williams, from the defendant, Robert Williams

The bill recites that the parties were married on the 2nd day of August, 1924. and lived together until the 3rd day of June, 1925. That ever since said marriage the oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said defendant. That the said defen-dant has on divers days and times since 'said marriage, committed the crime of adultery with divers lewd and abandoned women, whose names are unknown to your oratrix and said offense has not been condoned by your oratrix. That your oratrix has not lived or co-habited with said defendant since she discovered said adulteries. That there are no children born as result of said marriage. That your ora-trix is a citizen of the State of Maryland but the defendant a non-resident of the State of Maryland and when last heard of was in Middlesex County, Virginia.

It is thereupon ordered by the Circuit Court of Baltimore City this 5th day of February, 1927, that the plaintin by causing a copy of this order to be inserted in some daily newspaper published in Baltimore City, once a week for four successive weeks before the 8th day of March, 1927, give notice to the absent defendant of the object and substance of this bill, warning him to be and appear in this Court in person or by solicitor on or before the 24th day of March, 1927, to show cause, if any he may have why a decree should not be passed as prayed.

JAMES P. GORTER.

True Copy-Test: CHAS. R. WHITEFORD. f7,14,21,28 Clerk.

Ct. Ct. Docket B Cellian Urlliams Bobet Meliams Decree Pro Confesso.

Filed 10 May 1927

Robert Milians	Circuit Court of BALTIMORE CITY.
	Term, 192
The Defendant having been duly summe the Bill of Complaint, and having failed to appear (said Order).	med (notified by Order of Publication) to appear to thereto, according to the exigency of the writ,
•	
DECREED, that the complainant is entitled to relief in the is hereby taken pro confesso against the defendant. It relief the Plaintiff is entitled, it is further Adjudged, Court, take testimony to support the allegations of the	But because it doth not certainly appear to what and Ordered, that one of the Examiners of this e bill.
Anne protune as April 1927	James P. Forter

	61
Doc. B	1927

In the Circuit Court,

DEPOSITIONS

Lillian G. Williams
Volent Williams

No. 3/5

PLAINTIFF'S COSTS

Examiners \$..... Copies

Sheriff Stenographer

DEFENDANT'S COSTS

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

Stenographer

Lillian G. Williams
In the Circuit Court
Robert Williams OF BALTIMORE CITY.
Leu passed in Said cause
blen 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 SAPPING POW, one
of the Standing Examiners of the Circuit Courts of Baltimore City, under and by
of the Standing Examiners of the Circuit Courts of Baltimore City, under and by hume is June dated april 1/15/917. virtue of an order of the above named Circuit Court, passed in said cause on the
teuth day of may 1927, met on
the eleventh day of april in the year nineteen
hundred and twenty awey at my office, in the city of Baltimore, in the State
of Maryland, and assigned the eleventh day of april
in the same year at three-thirty o'clock in the after - noon and the
office of Niersts Wavist Evans 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
plaintif to take the following depositions, that
is to say:—

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VS.

ROBERT WILLIAMS

)

In the Circuit Court of
Baltimore City.

Testimony taken before me, Mason P. Morfit,
Special Examiner, in the offices of Messrs. Davis
& Evans, in Baltimore, on April 11, 1927, at 3:30
P. M.

Thereupon ---

LILLIAN G. WILLIAMS.

the plaintiff, of lawful age, produced on her own behalf, after having been first duly sworn according to law, was examined and testified as follows:

By the Examiner:

- Q State your name, residence and occupation?
- A Lillian G. Williams, 1146 Myrtle Avenue, Baltimore, janitress.
 - Q Do you know the parties to this suit?
- A Yes, I am the plaintiff and my husband is the defendant.

By Mr. Davis:

- Q When, where and by whom were you married?
- A On August 2, 1924, in Baltimore City, by Rev. Allen.
 - Q Are you living with your husband now?
 - A No.
 - Q When did you separate?
 - A June 3, 1925.
 - Q Which left the other?
 - A I left him.
 - Q Why?
- A He did not support me and attended houses that had bad reputations.
 - Q Did you have to work?
- A I had my sister and they helped me and my mother.
 - Q You say he attended a house of bad reputation?
 - A Yes.
 - Q Did you go there?
- A Yes, on Pierce Street between Myrtle and Octon. and saw him coming out.

- Q What time was it?
- A Two o'clock in the morning.
- Q Did you have occasion to suspicion his relations with the woman with whom you were living?
- A Yes, Miss Ella. I heard her telling him to give her money she wanted to get shoes.
 - Q Was that money for the rent?
 - A No. she had been paid for that.
 - Q When was she paid for that?
 - A Saturday night.
 - Q When was it she asked him for money?
- A Sunday morning he was trying to quiet her down I was in my bedroom.
 - Q Where were they?
 - A In the parlor downstairs with the door open.
- Q Did he ever say anything to you about his relations with this Miss Ella?
 - A Said he went with her before he was married.
 - Q Was she a married woman?
- A Yes, I don't know whether she lived with her husband or not.

- Q Did he say anything about going with her after the marriage?
 - A No.
 - Q Did he ever stay out all night?
 - A Yes, he has stayed out all night.
 - Q More than once?
 - A Three or four times.
 - Q What did he say?
 - A He would say he was gambling.
 - Q What would be his condition?
 - A Drunk, sometimes.
- Q Did you ever accuse him of being with any women?
 - A No.
- Q Did you ever accuse him of having relations with Miss Ella?
 - A Yes, he would say there was nothing to it.
- Q Did you ever hear them talking at other times, see any whispering?
 - A Yes, in the dining room once.

- Q Were you always a kind, faithful and affectionate wife?
 - A Yes.
- Q Have you lived or cohabited with him since you discovered his adulteries?
 - A No. sir.
- Q Were any children born as a result of the marriage?
 - A No.
- Qn Have you been a resident of the City of Baltimore, State of Maryland, for more than two years prior to the filing of your Bill of Complaint?
 - A All my life.
- Q Is your husband a resident of the State of Maryland?
 - A No. he lives in Middlesex County, Virginia.
 - Q Do you wish to resume your maiden name?
 - A Yes.
 - Q What is your maiden name?
 - A Lillian G. Thompson.

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.

Le fillian H. Williams.

Thereupon---

MRS. ERMA WOODS,

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

By the Examiner:

- Q State your name, residence and occupation?
- A Mrs. Erma Woods, 558 McMechen Street, Baltimore, laundress.
 - Q Do you know the parties to this suit?
 - A Yes, the plaintiff is my sister.

By Mr. Davis:

- Q Did you attend the wedding?
- A Yes.
- Q Your sister states she lived with her husband until June 3, 1925, when she left him. is that right?
 - A Yes.
 - Q Where were they living then?
 - A At my house, 558 Mc echen Street.
 - Q How did he treat his wife, did he support her?
- A Never had money to pay for his room rent while he was there and several times he would start a fight, I know that.

- Q Did she leave him?
- A Yes.
- Q Where did she go?
- A To her parents.
- Q Did you ever have any conversation with her husband with reference to his relations with this Miss Ella?
- A After she left him he told me he married her for spite and went with Miss Ella and he was going back there.
- Q Did he say he had been back to see Miss Ella after he married Lillian?
- A He used to go there, yes, while he was married to Lillian. Her son would come after him and he would go down to her house.
 - Q Where would Lillian be?
- A Sometimes right in the house sometimes down to mother's.
 - Q Did you know about his staying out all night?
 - A Yes, especially Saturday nights.

- Q All night?
- A Yes, he would come home dressed to go out and would go out and stay all night.
 - Q How did she treat her husband?
 - A Treated him very nice.
- Q Did she give him any cause to be unfaithful to her?
 - A No. sir.
 - Q Was she a kind, faithful and affectionate wife?
 - A Yes.
 - Q Were any children born as a result of the marriage?
 - A No. sir.
- Q Has she been a resident of the City of Baltimore, State of Maryland, for more than two years prior to the filing of her Bill of Complaint?
 - A All her life.
 - Q Is he a resident of the State of Maryland?
 - A No. he lives in Middlesex County, Virginia.
 - Q Have you ever seen him since the separation?
 - A No. sir.
 - Q How long did he stay there after she left?
 - A About a couple days.

- Q Then what happened?
- A He told me he was going back he used to live with Miss Ella.
 - Q Have you seen him since then?
- A No, sir, never heard from him except that I heard he went to Virginia.

_ _ _ _ _

GENERAL QUESTION

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. -- 200

Coma woods.

No other witnesses being named or produced before me, I then, at the	-
of the Solicitor of the plaintif	
placed the depositions taken in said source and new return them also due	
hand and seal, on this mileteuth day of M	ay
hand and seal, on this	at the
City of Baltimore, in the State of Maryland. M. J. Morfex. Exam	(CEAI)
Exam	iner.
There are Exhibits with these depositions	s, to wit:
Plaintiff's Exhibit	
Defendant's Exhibit M. O. Morfix,	
M. O. Morfix, Special Exam	ner.
I, A. de RUSSY SAPPINGTON, the Examiner before whom t going depositions were taken, do hereby certify that I was employed in a day, and taking the said depositions upon days, on	şsigning
of which I was employed by the Plaintiff, and on wife	
by the Defendant	ner.

Circuit Court Docket No._ Robert Melians Order of Reference and Report

Order Filed / 9 day of May 192)
Report Filed / day of time 1927

Coon Molean	
our at the	IN THE
	Circuit Court
(Olal Melians	OF
	BALTIMORE CITY
	ordered by the Court, this
This case being submitted, without argument, it is	
day of May , 1927 Hilliam P. Gyons	, that the same be and it is hereby referred to
•	, Esq.,.Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.	autuu Hurry
Report of Auditor	r and Master
Bill for divorce a vinculo matri	monii, filed by the wife against
her husband on the ground of adultery	c. Code Art. 16, Sec. 37-42.
Defendant proceeded against as a	non-resident, and his non-
residence proved.	
Plaintiff's residence in Baltimo	ore City for more than two years
prior to the filing of the bill prove	ed.
The marriage proved. Adultery p	proved; the testimony on this point,
it is submitted, is sufficient, thoug	th some of the statements are not clear
Decree pro confesso was passed a	against the defendant and more
than thirty days have since elapsed.	
Case ready for decree.	Mina' BY.
May 31, 1927.	
	

CIRCUIT COURT

B -61

1927

No.

Docket

LILLIAN G. WILLIAMS

VS.

ROBERT WILLIAMS

Recorded

Folio / 7 1927

Decree of Divorce

B No. 31477

Fd 49 June 1927.

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

William P. Lyons Aughtor and Master.)

DECREE OF DIVORCE.	IN THE
LILLIAN G. WILLIAMS	Circuit Co
	OF

LLLIAN G. WILLIAMS	Circuit Court
VS.	OF
	BALTIMORE CITY,
ROBERT WILLIAMS	MAY Term, 192_7
This cause standing ready for hearing and bein	g duly submitted, the proceedings were by the Court
read and considered.	
It is thereupon, thisday	of , A. D. 192
by the Circuit Court of Baltimore City, Adjudged, O	rdered and Decreed, that the said
LILLIAN G, WILLIAMS	
the above named Complainant be and She is hereby	DIVORCED A VINCULO MATRIMONII from the
Defendant, ROBERT WILLIAMS.	·
	~
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	•

And it is Further Ordered, That the said...Complainant, LILLIAN G. WILLIAMS pay the cost of this proceeding.

Same . P. Forter