

3/12/12/66

In The Circuit Court  
of B 499  
Baltimore City 1919

Sally Marshall

vs

Thoroughgood Marshall

Bill for Divorce A Vinculo

Mr Clerk please file

J. Stewart Davis atty  
118 E. Lexington St

B 19 740

11

FILED

6 August 1919

Sallie Marshall

In The Circuit Court

Vs.

of

Thoroughgood Marshall

Baltimore City.

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To The Honorable, The Judge of Said Court:

Your Oratrix, complaining, respectfully states:

FIRST, That the parties hereto were married, October 13, 1908, in Baltimore City, state of Maryland, by Rev. J. H. Taylor, a minister of the gospel; and they lived together as man and wife until October 28, 1912.

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 also a resident of the city of Baltimore, state of Maryland.

THIRD, That though the conduct of Your Oratrix towards her husband, has always been kind, affectionate, and above reproach, he, without just cause or reason, wilfully abandoned and deserted Your Oratrix; and has declared his intentions to live with her no longer; that such abandonment has continued uninterruptedly for more than three years prior to the filing of this bill of Complaint and was deliberate, final and beyond any reasonable hope or expectation of reconciliation.

FOURTH, That Your Oratrix has never condoned nor forgiven the said desertion, and that she has never co-habited with the said respondent since the said desertion.

FIFTH, That there are no children, born as a result of said marriage.

WHEREFORE YOUR ORATRIX PRAYS:

That a decree be passed, divorcing Your Oratrix from the

respondent, a vinculo matrimonii.

Such other and further relief as the case may require.

May it please Your Honor to grant unto Your Oratrix a writ of subpoena, directed unto the said respondent, commanding him to be or appear in this Court on some day certain, to be named therein, to perform such decree as may be passed in the premises.

As in duty bound etc.

*Sally Marshall,*  
Complainant

*(S. J. Davis)*  
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Solicitor for Complainant.

222 XK

498 859 Ct. Ct.  
191 9 Docket No.

Marshall  
"  
Marshall

**SUBPOENA TO ANSWER BILL OF COMPLAINT**

*Pro*  
B No. 19740  
{ 3 }

Filed 11 Aug 191 9  
J. S. Davis SOLICITOR

SP 3473 @

*Now Est of Thomas J. Mc Mully  
Shank*

EQUITY SUBPOENA

The State of Maryland

On

*Thoroughgood Marshall*

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 *August* 191*9*, to answer the complaint of

*Sallie Marshall*

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 *14* day of *July* 191*9*

Issued the *6* day of *August* in the year 191*9*

*Clark Whiteford* 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.”

**Ct. Ct.**

**191**

**Docket No.**

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**SUBPOENA TO ANSWER BILL OF COMPLAINT**

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No.

Filed .....191

**SOLICITOR**

EQUITY SUBPOENA

The State of Maryland

To

Thoroughgood Marshall



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 August 1919, to answer the complaint of

Sallie Marshall

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 14 day of July 1919

Issued the 6 day of August in the year 1919

Chas K Whiteford 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."

498  
1919

222 LK  
239  
B59 Ct. Ct.  
Docket No.

Marshall  
vs.  
Marshall  
422 N Banc St

Subpoena to Answer Bill of Complaint

Pro  
No.  $\text{\textcircled{D}}$  19740  
(3)

Filed 23 Aug 1919

J. S. Davis  
SOLICITOR  
30 3473-8 B

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

Thomas F. McQuilty  
Sheriff

(McQuilty)  
Fees \$0.50



EQUITY SUBPOENA

The State of Maryland

To

*Thoroughgood Marshall*

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 *September* 191*9*, to answer the complaint of

*Sallie Marshall*

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 *14* day of *July* 191*9*

Issued the *13* day of *August* in the year 191*9*

*Chas. R. Whiteford*

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."

498  
1919 Docket

Ct. Ct.

Sally Marshall

vs.

Thosugood Marshall

Decree Pro Confesso.

19740

No. (4)

Filed

29 Sept 1919

Sallie Marshall

vs.

Thoroughgood Marshall

IN THE  
Circuit Court

OF

~~M.D.~~ ~~Del.~~

BALTIMORE CITY.

Term, 1919

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 29 day of September in the year nineteen hundred and ineteen 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.

James P. Gorton

STATE OF MARYLAND,  
BALTIMORE CITY, SCT :

I hereby certify that on this 26<sup>th</sup> day of September 1919 before me, the subscriber, a Notary Public, of the State of Maryland, in and for the County ~~City~~ aforesaid, personally appeared Sallie Marshall 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.

Sallie Marshall,

Arthur M. Rogers  
Notary Public.

Docket B. 499/1919

IN THE CIRCUIT COURT

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Sallie Marshall

vs

Thoroughgood Marshall

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**DEPOSITIONS**

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No.

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PLAINTIFF'S COSTS

Examiner	\$ 8.00
Copies	
Notices	
Sheriff	
Stenographer	1.50
	<hr/> <hr/>
	\$ 9.50

DEFENDANT'S COSTS

Examiner	\$
Copies	
Notices	
Sheriff	
Stenographer	
	<hr/> <hr/>
	\$

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ALFRED J. CARR, Examiner

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Filed

day of

191

\_\_\_\_\_  
Sallie Marshall  
\_\_\_\_\_  
vs  
\_\_\_\_\_  
Thoroughgood Marshall  
\_\_\_\_\_  
\_\_\_\_\_

In the Circuit Court \_\_\_\_\_  
OF BALTIMORE CITY

\_\_\_\_\_ A Decree Pro Confesso having passed \_\_\_\_\_

and notice having been given me by the Solicitor for the Plaintiff  
of a desire to take testimony in the same, I, ALFRED J. CARR, 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  
29th day of September 1919, met on  
the 30th day of September in the year nineteen  
hundred and nineteen at my office, in the City of Baltimore, in the State  
of Maryland, and assigned the third day of October  
in the same year at three o'clock in the after noon and the  
office of the Examiner, \_\_\_\_\_ 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 deposition, that  
is to say:—

SALLIE MARSHALL, the Plaintiff, produced as a witness on her own behalf, being duly sworn, deposeth and saith as follows-that is to say-

BY THE EXAMINER:

1 Q- State your name, residence and occupation ?

A- Sallie Marshall; 1400 Jefferson street, Baltimore. I am a Seamstress.

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

A- Yes, Thoroughgood Marshall is my husband, I am the Plaintiff.

BY MR. DAVIS:

3 Q- When, where and by whom were you and the defendant married ?

A- I was married October 13th, 1908 at 1507 E.Monument street, Baltimore City, by Rev. J.H.Taylor, a Baptist Minister.

4 Q- Where did you and your husband reside after the marriage ?

A- After we were married we first lived at 1710 Milliman street.

5 Q- Were there any children born of your marriage ?

A- No sir.

6 Q- How long have you resided continuously in the State of Maryland prior to August 6th 1919 ?

A- All my life in Baltimore, Md.

Mrs Sallie Marshall.

7 Q- What was your conduct towards and treatment of your husband during your married life ?

A- Very affectionate and kind and my conduct was above reproach.

8 Q- How did your husband treat you ?

A- Fair. He would drink and stay out late at night and often refused to give me any money for the home.

9 Q- Are you and your husband living together now ?

A- No sir.

10 Q- When did you separate and which one left the other ?

A- He left me in 1912, on October 28th.

11 Q- Where were you living at that time ?

A- 1611 E. Monument street.

12 Q- What occurred on October 28th 1912, the day your husband left you?

A- My husband did not have to report for work until twelve o'clock. I went to market and when I got back I found my husband had taken his clothes and gone, leaving the doorkey on the dining room table.

13 Q- Have you seen or had any communication from your husband since he left you, October 28th 1912?

A- After he left I saw him on the street but did not have any talk with him, but I have not seen or heard from him for over three years.

Mrs Sallie Marshall.

14 Q- Do you know where he lives ?

A- In Baltimore some place, as far as I know.

15 Q- Has he in any way contributed towards your support?

A- No sir, not one cent.

16 Q- Has or not the abandonment of you by your husband continued uninterruptedly for more than three years prior to August 6th 1919, when you filed this Bill ?

A- Yes, all the time since he left me October 28th 1912

17 Q- Was the abandonment of you by your husband his own deliberate and final act ?

A- It was. He has no reason to leave; he left me and has never come back or communicated with me.

18 Q- Is there or not any reasonable hope or expectation of a reconciliation between you and your husband ?

A- No sir; there could be none.

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Question by the Examiner:

Do you know or can you state any other matter or thing that may be of benefit or advantage to 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.

Answer:

*No*

*Sallie Marshall.*

CHARLES H. GREEN, a witness produced on behalf of the Plaintiff, being duly sworn, deposeseth and saith as follows-that is to say-

BY THE EXAMINER:

1 Q- State your name, residence and occupation ?

A- Charles H. Green; 723 School street. Hod-Carrier.

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

A- The plaintiff is my daughter and the defendant is her husband .

BY MR. DAVIS:

3 Q- How do you know the defendant is your daughter's husband ?

A- I was at their wedding, 1507 E.Monument street and saw them married by the Rev. Taylor of the Baptist Church.

4 Q- Are there any children living born of their marriage

A- No sir.

5 Q- Where has the plaintiff lived for more than two years last past ?

A- My daughter has lived in Baltimore all her life, and Mr Marshall has lived in Baltimore since their marriage.

6 Q- From your observation how did your daughter treat her husband ?

A- She was a good, true, faithful wife to him and worked and did her part.

Charles H. Green.

7 Q- How did Mr Marshall treat his wife ?

A- Fairly good, but he would drink and stay out and did not work steady.

8 Q- Are the parties to this suit living together now, if not, when and why did they separate, and which one left the other ?

A- No; he left his wife October 1912 and has never come back; he simply left, I couldn't see any reason for him to leave.

9 Q- Has or not the abandonment of your daughter, the plaintiff, by her husband, the defendant, continued uninterruptedly for more than three years prior to August 6th 1919, when this case was filed ?

A- Yes; he left in October 1912 and it has continued uninterruptedly ever since.

10 Q- Was the abandonment of the plaintiff by the defendant his own deliberate and final act ?

A- Yes sir.

11 Q- Is there or not any reasonable hope or expectation of a reconciliation between them ?

A- No hope at all.

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Question by the Examiner:

Do you know or can you state any other matter or thing that may be of benefit or advantage to 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.

Answer:

*No*

*Charles Green*

MRS. MARY GREEN , a witness produced on behalf of the Plaintiff, being duly sworn, deposes and saith as follows-  
that is to say-

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Mary Green; 506 Central avenue. I am a Laundress.

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

A- Yes sir, her and him since their marriage.

BY MR. DAVIS:

3 Q- Are the parties to this suit man and wife; If so, how do you know ?

A- I know they are man and wife; that was their reputation and I saw their marriage certificate.

4 Q- Were there any children born of their marriage?

A- No.

5 Q- Are the parties to this suit now living together ?

A- No sir, they are not.

6 Q- Which one left the other, if you know ?

A- He left her. I know it because I went to their house the next day and he was gone.

7 Q- Has the plaintiff, to your knowledge, lived with the defendant since he abandoned her in October 1912 ?

A- No sir.

8 Q- Has or not the said abandonment of the plaintiff by the defendant continued uninterruptedly for more than

Mrs Mary Green.

three years prior to August 6th, 1919 ?

A- It has been about seven years since he left her.

9 Q- Was the abandonment of the plaintiff by the defendant deliberate and final ?

A- It was.

10 Q- Is there or not any reasonable hope or expectation of a reconciliation between them ?

A- No sir.

-----

Question by the Examiner:

Do you know or can you state any other matter or thing that may be of benefit or advantage to the parties to this suit or either of them or that may be material to the subject of this year examination or the matters in question between the parties? If so, state the same fully and at large in your answer.

Answer:

*No*

*her*

*Mary A Green*

*Test*

*mark*

*Arthur J. Carr*

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 \_\_\_\_\_ day of \_\_\_\_\_ in the year of Our Lord nineteen hundred and nineteen at the City of Baltimore in the State of Maryland.



\_\_\_\_\_  
Examiner.

There are no Exhibits with these depositions, to wit:  
Plaintiff's \_\_\_\_\_ Exhibit \_\_\_\_\_

Defendant's \_\_\_\_\_ Exhibit \_\_\_\_\_

\_\_\_\_\_  
Examiner.

I, ALFRED J. CARR, the Examiner before whom the foregoing depositions were taken, do hereby certify that I was employed in assigning a day, and taking the said depositions upon two days, on both of which I was employed by the plaintiff \_\_\_\_\_, and on none by the defendant \_\_\_\_\_.

\_\_\_\_\_  
Examiner.