

P 116

In the Circuit
Court of Balt-
timore City

Randolph Mason
vs

Minnie D. Mason
1303 Myrtle Ave

Bill of Complaint

W. Clerk.

Please

file, etc

~~Minnie D. Mason~~
Sol. for complainant

320681

FILED 26 Feb 1920

Randolph Mason *
vs. *
Minnie Brooks Mason *

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT,

Your Orator complaining says:

1. That on the 10th day of September, 1914, he was married to his wife, Minnie Brooks Mason, with whom he resided until the 12th day of January, 1917.
2. That he has been a resident of the City of Baltimore, State of Maryland, for more than two (2) years previous to the filing of this, his bill of complaint.
3. That there is one child born as issue of said marriage, namely, Maretia Mason, who is in the custody of the defendant, Minnie Brooks Mason.
4. That the respondent has committed the crime of adultery with divers men unknown to your Orator at this time.
5. That your Orator has not condoned the said offenses.

To the end therefore,

(a) That your Orator may be divorced A Vinculo Matrimonii from the respondent, the said Minnie Brooks Mason.

(b) That your Orator may have such other and further relief as his case may require.

May it please Your Honor to grant unto your Orator the writ of subpoena, directed to the said Minnie Brooks Mason, who is a resident of the City of Baltimore, State of Maryland, commanding her to be and appear in this Honorable Court, in person or by solicitor, on some certain day to be named therein, to show cause, if any she may have, why a decree ought not to be passed as prayed.

Maurice J. Dism
.....
Solicitor for Complainant.

Randolph Mason
.....
Complainant.

116 Pleo ⁵⁵⁴

Ct. Ct.

1920 Docket No.

Mason
Mason
Pnt

SUBPOENA TO ANSWER BILL OF COMPLAINT

B 1303 Myrtle ave
No. 20681
(2)

Filed 1 March 1920
Maurice J Blum
SOLICITOR
10

Summond and a copy of the Process goes with the
defendant

Thomas F. McNulty
Sheriff

(Kelly)
Fee. \$0.50.

EQUITY SUBPOENA

The State of Maryland

To

Minnie B Mason

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 March 1920 to answer the complaint of

Randolph Mason

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 12 day of Jan 1920

Issued the 26 day of February in the year 1920

Clark Whitford 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

176

1920

Docket No. 60-B

Randolph Mason

vs.

Minnie B. Mason

ORDER OF APPEARANCE

Mr. Clerk

Please File

Arling C. Dew

Sol. for Plaintiff

B
No. 20681

Filed 18⁽³⁾ day of March 1920

Randolph Mason

Minnie Brooks Mason

IN THE
Circuit Court
OF
BALTIMORE CITY

January Term, 1920

Mr. WHITEFORD, Clerk.

Enter my appearance for Defendant

Achey Dew

Solicitor

Faint watermark text: HAMMERS, BEDGE

IN THE
CIRCUIT COURT OF
BALTIMORE CITY

B 116

RANDOLPH MASON

1920

VS.

MINNIE B. MASON

A N S W E R

Mr. Vlerk:

Please file.

Archie C. New
SOLICITOR FOR DEFENDANT.

*B 50681
(4)*

ARCHIE C. NEW
ATTORNEY AT LAW
27. LEHIGH ST.
BALTIMORE, MD.
Filed March 1920

RANDOLPH MASON
VS.
MINNIE G. MASON.

*
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*

IN THE
CIRCUIT COURT OF
BALTIMORE CITY.

To the Honorable, the Judge of said Court:

The Defendant, Minnie B. Mason, of the City of Baltimore, State of Maryland, by Archey C. New, her Solicitor, for answer to the Bill of Complaint heretofore filed against her in this cause, respectfully represents:

1. Your respondent denies that she was married to the Plaintiff on the 10th day of September, 1914, as alleged in the aforesaid Bill of Complaint, but avers that she was married to him on October, 13, 1914, and she further denies that the Complainant resided with her until January, 12, 1917, but avers that they continued to live and co-habit together, at irregular intervals, as man and wife until a certain day in the month of October, 1919.
2. Your respondent further denies the allegations set forth in the second paragraph of the Bill of Complaint, and she further avers that the Complainant has been a resident of the City of Philadelphia, State of Pennsylvania, for more than two years immediately prior to the filing of his Bill of Complaint.
3. Your respondent admits the allegations in the third paragraph of the Bill of Complaint.
4. Your respondent denies the allegations set forth in the fourth paragraph of the Bill of Complaint, viz: that she has been guilty of the crime of adultery with divers men unknown to the Complainant at the time of the filing of his Bill of Complaint, but, on the contrary, states that she has always acted as a chaste, faithful and affectionate wife towards the Complainant and her conduct has always been above reproach.
5. Your respondent, answering the fifth paragraph of the Bill of Complaint, avers that, inasmuch as she was not guilty of the crime of adultery as alleged in said Bill of Complaint, there was no offense for the Complainant to condone, and she therefore denies the allegation set forth in the said fifth paragraph.
6. Your respondent, further answering the said Bill of Complaint, avers that the Complainant does not come into this Court with clean hands, but that, on the contrary, he has been guilty of the crime of adultery with divers lewd and abandoned women in the City of Philadelphia and elsewhere, whose

names will be revealed at a proper hearing of this cause.

7. Your respondent, further answering the said Bill of Complaint, says that the Complainant abandoned and deserted her in the City of Baltimore without any just cause or provocation, on a certain day in the month of October, 1919, after repeated and continuous periods of desertion by him extending over a period of two years, and that he has not lived or co-habited with her as man and wife since the said day and date.

8. Your respondent, further answering the said Bill of Complaint, says that the Complainant, after failing at frequent intervals during their married life and for long periods therein, to provide for the support of herself and their infant daughter, ceased to provide anything for their support and maintenance after the 23rd day of December, 1919 or thereabouts, and that, because of his absence from the City of Baltimore and the State of Maryland, she was obliged to cause his arrest in, and extradition from the City of Philadelphia, State of Pennsylvania, on the charge of failing to provide for her support and the support of their infant daughter, he having been indicted therefor by the Grand Jury of Baltimore City, and that, upon his arraignment in the Criminal Court, Part 2, of Baltimore City, on the 11th day of March, 1920, the trial of said charges were continued indefinitely by the Court, pending the payment by the Complainant herein to your respondent of the sum of seven dollars weekly for her support and the support of their infant daughter.

Wherefore your Respondent, having answered fully the allegations set forth in the Bill of Complaint, prays that she may be dismissed with her proper costs.

And as in duty bound, etc.

Minnie B. Mason.
DEFENDANT.

Archie C. Lewis.
SOLICITOR FOR COMPLAINANT.

STATE OF MARYLAND.)
CITY OF BALTIMORE.)

I HEREBY CERTIFY that, on this 22 day of March, 1920, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared Minnie B. Mason, the Defendant named in the foregoing answer, and she made oath in due form of law that the matters and facts as therein set forth, are true, to the best of her knowledge, information and belief.

AS WITNESS my hand and notarial seal.

Anna S. Goben
NOTARY PUBLIC.

B 116
1920

IN THE
CIRCUIT COURT OF
BALTIMORE CITY.

RANDOLPH MASON

VS.

MINNIE B. MASON.

PETITION FOR ALIMONY
PENDENTE LITE AND COUNSEL
FEE.

Mr. Clerk:

Please file.

Archey C. New
SOLICITOR FOR DEFENDANT

B 20681
(5)

fd 22 March 1920
ARCHHEY C. NEW
ATTORNEY AT LAW
217 LEHIGH ST.
BALTIMORE, MD.

RANDOLPH MASON

VS.

MINNIE B. MASON.

*
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*
*
*
*
*

IN THE
CIRCUIT COURT OF
BALTIMORE CITY.

To the Honorable, the Judge of said Court:

The Defendant, Minnie B. Mason, of the City of Baltimore, State of Maryland, by Archey C. New, her Solicitor, respectfully represents:

1. That heretofore, to wit, on or about the 26th day of February, 1920, the Complainant in this cause filed his Bill of Complaint in this Court, praying that a decree be passed by this Honorable Court divorcing him a vinculo matrimonii from the Defendant, Minnie B. Mason.
2. That the Defendant has filed her answer to the said Bill of Complaint, denying the allegations therein set forth as to the crime of adultery alleged to have been committed by her, and by her answer also alleging that the Complainant has been guilty of the crime of adultery with certain persons named therein, that he deserted and abandoned the Defendant, that he failed to provide adequately for her support and the support of their infant daughter named in the said Bill of Complaint, and praying that she might be dismissed with her proper costs.
3. That, because of the failure of the Complainant to provide for the support of the Defendant and their infant daughter, the Defendant caused his arrest in, and extradition from the City of Philadelphia, State of Pennsylvania, on the charge of failing to provide for her support and the support of their infant daughter, he having been indicted therefor by the Grand Jury of Baltimore City, and that, upon his arraignment in the Criminal Court, Part 2, of Baltimore City on the 11th day of March, 1920, the trial of said charges was continued indefinitely by the Court, and he was ordered by the said Court to pay the sum of seven dollars weekly to your Defendant for her support and the support of their infant daughter, during such continuance.
4. That your Defendant is in destitute circumstances and unable to provide for the support of herself and their said infant daughter, or to defray the expenses of defending this suit, while from information received from the Complainant and from other sources, she understands that he has been earning eighteen dollars and more each week, besides being possessed of an automobile, and other personal possessions of great monetary value, which he receives for his services as a chauffeur and general mechanic in the city of Philadelphia, State of Pennsylvania.

5. That the Defendant will be ready and able to produce abundant evidence, at a proper hearing upon the allegations contained in the said Bill of Complaint, disproving the same and showing such allegations to be groundless and made because of malicious motives on the part of the Complainant, and also proving the truth of the counter-charges made by her, the Defendant, against the Complainant, in her said answer to his Bill of Complaint.

Wherefore the Defendant prays:

1. That this Honorable Court pass an order, ordering and directing the said Complainant, Randolph Mason, to pay her a reasonable sum weekly, as alimony pendente lite, for the support of herself and their infant daughter, and also a reasonable sum as counsel fee, to enable her to properly defend this suit.

2. And that she may be awarded such other and further relief as this Court may deem requisite and necessary.

And as in duty bound, etc.

Minnie B. Mason.
DEFENDANT.

Archey C. Hew
SOLICITOR FOR DEFENDANT.

STATE OF MARYLAND.)
CITY OF BALTIMORE.) SSJ

I HEREBY CERTIFY that, on this 22 day of March, 1920, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore, personally appeared Minnie B. Mason, the Defendant in the above-entitled cause, and she made oath in due form of law that the matters and facts as set forth in the foregoing Petition are true, to the best of her knowledge, information and belief.

AS WITNESS my hand and notarial seal.

Anna S. Nolan
NOTARY PUBLIC.

Blev Docket 116
1920

Circuit Court

Mason

vs. Mason

3/24/20

1103 E. Mormon St
Petition and

Order Counsel Fee and Alimony

Pendente Lite

B No. 50681

\$25.00 (6) (7)
no children

Ad 23 March 1920
" 16 am
3

Copy of the within Order of court served on
Randolph Mason on the 24th day of March, 1920,
in presence of Morris Trinkelstein,

Thomas J. M. Mully
Sheriff

Fee \$0.50

-IN THE-
CIRCUIT COURT

-OF-
BALTIMORE CITY

Randolph Mason

vs.

Minnie B Mason

March TERM

ORDERED BY THE COURT this *23* day of *March* 19*20*

that the Plaintiff *Randolph Mason*

pay to the Defendant *Minnie B Mason*

the sum of *twenty-five* Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of *eight*

Dollars per week, during the continuance of this suit, to the said Defendant *Minnie B Mason*

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the *7*

day of *April* 19*20*, provided a copy of this Order be served on the said Plaintiff

Randolph Mason on or before the *31*

day of *March* 19*20*

Robert J. Stanton

TRUE COPY—TEST:

CLERK

A copy of the foregoing order having been served upon the defendant as is shown by the Sheriff's return hereon, and no cause to the contrary having been shown, it is this *16th* day of *April* 19*20*, ordered by the Circuit Court of Baltimore City that the same be, and it is hereby made absolute and final.

Robert J. Stanton

116
CIRCUIT COURT

116 Blw
19 20 Docket No.

Russell Mason

vs.

Minnie Mason

ORDER OF APPEARANCE

Mr. Clerk

Please File

Q. ~~John~~ *John*

Sol. for ~~def~~

B

plaintiff

No.

20681

(8)

Filed 24 day of Apr 1920

Randolph Mason

vs.

Minnie Mason

IN THE
Circuit Court
OF
BALTIMORE CITY

Term, 1922

Mr. WHITEFORD, Clerk.

Plaintiff

Enter my appearance for Defendant

(J. H. Jans)

Solicitor

In the B 116
1940
Circuit
Court of
Baltimore City

Mason

vs

Mason

Mr. Clerk.

Please

file etc.

Harvey J. Sum

B 20681

(9)

fd 26 June 1940

Mason *
*
vs *
*
Mason *

IN THE CIRCUIT COURT OF BALTIMORE CITY.

Mr. Clerk,

Please strike out my appearance in the above entitled
Case.

Harold J. Plum
.....

In the Circuit Court

No. 2 *B 116*
Baltimore City. *1920*

RANDOLPH MASON
VS.
MINNIE BROOKS MASON

-Cross Bill-

MINNIE BROOKS MASON
VS.
RANDOLPH MASON.

Cross-Bill. *see*

Mr. Clerk:--

B 20681

Please file &c.,

Roy S. Bond

Sol. for Complainant in
Cross Bill.

ROY S. BOND
ATTORNEY AT LAW
215 ST. PAUL PLACE
BALTIMORE, MD.

FILED

24 October 1920

RANDOLPH MASON

VS.

In the Circuit Court

MINNIE BROOKS MASON

of Baltimore City.

-Cross Bill-

MINNIE BROOKS MASON

VS.

RANDOLPH MASON.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Complainant in the Cross-Bill, Minnie Brooks Mason, respectfully represents to the Court as follows:

FIRST: That heretofore Randolph Mason, the husband of this Complainant, filed his Bill of Complaint against her in this Honorable Court, alleging among other things that this Complainant has, without just cause or reason, committed the crime of adultery with divers, men unknown to your Orator.

SECOND: That this Complainant has answered said Bill of Complaint, and in her answer has shown that the said Randolph Mason is not entitled to the relief in this Honorable Court, and she also further denied all the material allegations alleged in said Bill and each paragraph thereof.

THIRD: That this Complainant in the Cross-Bill, Minnie Brooks Mason, and the Respondent in the Cross-Bill, Randolph Mason, were married in the City of Baltimore, State of Maryland, on or about the 13th day of October 1914, and lived together as man and wife until on or about the 3rd day of October 1919.

FOURTH: That the Complainant in Cross-Bill is a resident of Baltimore City, State of Maryland and has been for more than two years prior to the filing of this Bill of Complaint.

FIFTH: That one child was born to the union of this suit; namely, Maretia Mason, aged seven years.

SIXTH: That the Respondent in the Cross-Bill, the said Randolph Mason, has committed the crime of adultery with

divers, lewd women, whose names will be disclosed on the day of trial, and that the said acts were committed without her procurement, connivance, or consent and that she has not lived nor cohabited with the said defendant since she discovered the same.


SEVENTH: That the conduct of your Orator during and since the said marriage, has been above reproach in all respects, having always been a kind, affectionate wife to the said defendant.

WHEREFORE the premises considered the Complainant in the Cross Bill prays as follows:-

- a- That she may be divorced from her husband, the respondent in Cross Bill, the said Randolph Mason, A Vinculo Matrimonii.
- b- That she may be awarded the care and custody of the infant child, Maretia Mason aged seven years, and maintenance for her support.
- c- That she may resume her maiden name, Minnie Brooks.
- d- Such other and further relief as the case may require.

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

As in duty bound, etc.,


Sd. for Complainant.

KNOW ALL MEN BY THESE PRESENTS, that I, Minnie Mason, of the City of Baltimore, State of Maryland, do constitute and appoint Roy S. Bond, as my true and lawful Attorney in the matter of the divorce case of Minnie Mason versus **Randolph** Mason, hereby granting unto my Attorney all power to act in every compacity for me in the same. and hereby discharging all others and declaring the said Roy S. Bond, my only true and lawful Attorney.

IN WITNESS WHEREOF, I set my hand and Seal this 20th
day of October 1921.

Minnie Mason
Complainant.

262-290

116 B60 Ct. Ct.
1920 Docket No.

Mason
Mason

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. ~~2081~~ 20681
Pw

Filed 14 Nov 1921
" 13 Dec 1921
Roy S. (Gard) SOLICITOR
Pw

Thomas F McNeely
Sheriff

Wm Est

REISSUED TO December 17 1921
Return Day, 1921
Clerk

Wm Est

Thomas F McNeely
Sheriff

EQUITY SUBPOENA

The State of Maryland

To

Randolph Mason

Handwritten notes and stamps, partially illegible.



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 **November** ^{next} cause an appearance to be entered for you and your answer to be filed to the complaint of *Cross Bill of*

Minnie I. Mason

against you exhibited in the Circuit Court of Baltimore City,

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

James P. Gorter

WITNESS, the Honorable ~~MORRIS A. SOPER~~, Chief Judge of the Supreme Bench of

Baltimore City, the **12th** day of **September** 192 **1**

Issued the *24.* day of **October**, in the year 192 **1**

Chas R. Whiteford

Clerk.

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11.)

Ct. Ct.

192

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed 192

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

To

Randolph Mason



REISSUED TO

11/17 192 *1*
December Return Day, 192 *1*
Chas R Whiteford
Clerk

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 *November* next cause an appearance to be entered for you and your answer to be filed to the complaint of *Carroll Bice*

Minnie B Mason

against you exhibited in the Circuit Court of Baltimore City,

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

James P. Gorter

WITNESS, the Honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *12th* day of *September* 192 *1*

Issued the *24* day of *October*, in the year 192 *1*

Chas R. Whiteford

Clerk.

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11.)

In the Account Book
of 11/16
Baltimore 1920

Joseph Masan

↳
Minnie B. Masan
Cross Bell

Minnie B. Masan

↳
Franklin Masan

Answer to Cross Bell

Not to be filed

(~~John~~)

B 20681
(12)

DAVIS & BISHOP
ATTORNEYS AT LAW
BANKERS BUILDING
14 E. PLEASANT STREET
BALTIMORE, MD.
B. H. 1921

RANDOLPH MASON

.....

IN THE CIRCUIT COURT

VS

OF

MINNIE BROOKS MASON

.....

BALTIMORE CITY

-Cross Bill-

RANDOLPH MASON

VS

MINNIE BROOKS MASON

.....

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Complainant in the cross-bill, Randolph Mason respectfully represents to the Court as follows:-

FIRST, Your respondent admits the allegation as contained in the first paragraph of the aforementioned amended bill of complaint.

SECOND, Your respondent neither admits nor denies the second paragraph of the aforementioned amended bill of complaint.


THIRD, Your respondent admits the third paragraph as contained in the aforementioned amended bill of complaint.

FOURTH, Your respondent admits the fourth paragraph as contained in the aforementioned amended bill of complaint.

FIFTH, Your respondent admits the fifth paragraph as contained in the aforementioned amended bill of complaint.

SIXTH, Your respondent with great emphasis denies emphatically the allegations as contained in the aforementioned amended bill of complaint and insists on the strictest legal proof thereon.

SEVENTH, Your respondent denies the seventh paragraph as contained in the aforementioned amended bill of complaint.


SOLICITOR FOR COMPLAINANT.

Circuit Court ~~No. 2~~

116
1920

Docket 29B-

RANDOLPH MASON
Vs.

MINNIE B. MASON

Cross vs. Bill.

MINNIE B. MASON

VS.

RANDOLPH MASON.

Petition for Leave to Take
Testimony and Order of
Court Thereon.

B 20681

No.

copy 13

5 nov
Filed , 192

RANDOLPH MASON

VS.

MINNIE B. MASON.

Cross vs. Bill.

MINNIE B. MASON

VS.

RANDOLPH MASON.

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 Minnie B. Mason,

Complainant,

in this case, respectfully shows that she desires to take testimony in this case, and respectfully prays that leave be granted her to do so before one of the Standing Examiners of this Court.

[Handwritten Signature]
Solicitor for Complainant.

ORDERED, this 5 day of November, 1921, 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.

[Handwritten Signature]

3/12/13/3

Doc. B ¹¹⁶
1920

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Minnie B. Mason

vs.

Randolph Mason

No. 20681 B

PLAINTIFF'S COSTS

Examiners.....\$ 5⁰⁰
Copies.....
Sheriff.....
Stenographer.....2⁰⁰
\$ _____

DEFENDANT'S COSTS

Examiners.....\$ _____
Copies.....<15>
Sheriff.....
Stenographer.....
\$ _____

Ad. 6th February 1922

Minnie B. Masou

vs.

Randolph Masou

In the Circuit Court

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

fifth day of November 1921, met on the fifth day of November in the year nineteen hundred and twenty-one at my office, in the City of Baltimore, in the State of Maryland, and assigned the seventh day of November

in the same year at two o'clock in the afternoon and the office of Roy S. Bond, Esq. in the City and State

aforsaid, 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:—

8-2 B.

Mason,

v.

Mason.

Testimony taken at the office of Roy S. Bond, Esq.,
215 Courtland Street, Baltimore, Maryland, November
1921, at 3 O'clock P. M.

MINNIE MASON, the Plaintiff in this case,
produced on her 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. Minnie Mason, 1303 Myrtle Avenue; store work .

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

A. I am the Plaintiff and my husband is the De-
fendant .

BY MR. BOND:

1 Q. When were you married?

A 1914.

2 Q. What month?

A. October 13th.

3 Q. Were you married by a Minister of the Gospel?

A. Yes.

4 Q. In Baltimore City?

A. Yes.

5 Q. According to a Religious Ceremony?

Minnie Mason.

A. Yes.

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

A. One.

7 Q. Name and age?

A. Maurita, seven years old.

8 Q. Have you the custody of the child?

A. Yes.

9 Q. Are you able and willing to properly support, educate and rear the child?

A. I am able to support the child with some assistance from my husband.

10 Q. Have you or not entered into an agreement with your husband with reference to alimony in this case through counsel?

A. Yes.

11 Q. And with this amount called for in this agreement you are willing and able to support, educate and rear your child?

A. Yes.

12 Q. What was your conduct towards your husband while living together?

A. All right.

Minnie Mason.

13 Q. State whether or not you were always a kind, affectionate and faithful wife?

A. Yes.

14 Q. Are you and your husband living together now?

A. No sir.

15 Q. Which left the chgr?

A. He left me.

16 Q. When?

A. October 1919.

17 Q. You charge your husband with adultery; what do you know personally about that; do you know anything personally about it.

A. Well, he has been going with this woman off and on for four years.

19 Q. How do you know that?

A. Well, she has written letters because I sw them, although I only got a glimpse at them because he grabbed them away from me, and I have seen him go into his brother's with this woman, and he acknowledged to me himself that he was going with her, and that he was going to continue going with her.

20 Q. Did you or not charge him with adultery with this woman.

A. Yes.

Minnie Mason.

21 Q. Did he admit them or deny them.

A. He admitted them.

22 Q. And then what did you do?

A. And then I left him.

23 Q. Have you lived or cohabited with him since he admitted his adulteries to you?

A. No sir.

24 Q. Have you forgiven or condoned his offense in any way?

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. ---

Yes
Thirine Mason

MAMIE CAMPBELL, 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. Mamie Campbell, 1303 Myrtle Avenue; home work.

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

A. Yes.

BY MR. BOND:

1 Q. Are they husband and wife?

A. Yes.

2 Q. Did they live together as husband and wife and were they always known and recognized in the community in which they lived as husband and wife?

A. Yes.

3 Q. Has the Plaintiff been a resident of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit?

A. Yes.

4 Q. There is one child as the result of this marriage, do you think that she is the fit and proper party to have the care and custody of the child.

A. Yes.

5 Q. And is she able and willing to support, educate and rear the child with some assistance from her husband?

A. Yes.

Mamie Campbell.

6 Q. What was her conduct towards her husband while living together?

A. Always very good.

7 Q. State whether or not she was always a kind, affectionate and faithful wife?

A. Yes.

8 Q. Are the parties to this suit living together now?

A. No sir.

9 Q. Which left the other?

A. He left her.

10 Q. When?

A. October 1919.

10 Q. She has charged her husband with adultery do you know anything personally about that.

A. Yes.

11 Q. Tell us?

A. Well, I was in Philadelphia two years ago in July prior to the separation and he was supposed to be living on Christian Street, and I went to visit him, and he said "Come on", and he was going to the garage to get his car, and when we got there he had taken me to 1334 Carpenter Street, and I met this lady, and I was introduced to her, and he went upstairs in her bed room, and sat across the bed,

Mamie Campbell.

and his clothes were hanging on her costumer in the room, and I saw them when he took me out in the machine; I saw him when he kissed her goodbye at the door, and sine that time I know that he has been living with her.

12 Q. How do you know that.

A. I have seentthem there; I went visiting there and he was in the bed.

13 Q. He was in the bed with her?

A. Well, he was not exactly in the bed with her, but she was sitting alongside of the bed in her night gown.

14 Q. Did you ever spend a night at that house where he is living with this woman.

A. I have stayed there until three O'clock in the morning.

15 Q. Did you ever see him retire to the bed room with this woman?

A. Yes.

16 Q. And what did he tell you about this woman.

A. He said that was his girl.

17 Q. And did he or not admit to you that he was living with her in adultery?

A. Yes.

18 Q. More than once?

A. O, yes.

Mamie Campbell.

19 Q. He did not try to hide it did he.

A. No sir.

20 Q. And when was that; during what period of time was he maintaining these relations with this woman

A. July two years ago; that was before the separation, and it has been since the separation, - I have been there and I saw the same thing. I never told Mrs. Mason anything at all before the separation, but after the separation she sent to find out -- she seemed to find out something herself and she came to me and asked me and I told her. I told her after the separation.

21 Q. Has she lived or cohabited with her husband since she discovered his adulteries?

A. No sir.

22 Q. Has she forgiven or condoned his offense in any way?

A. No sir.

23 Q. Has Mrs. Mason lived or cohabited with her husband since October 1919?

A. Not to my knowing.

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.-----

Yes
Mrs Mamie Campbell

WALTER GREEN 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. Walter Green, 1325 Walnut Street; Philadelphia, Pennsylvania; laborer.

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

A. Yes.

BY MR BOND:

1 Q. Are they husband and wife?

A. Yes; as far as I know.

2 Q. Did they live together as husband and wife and were they always known and recognized in the community in which they lived as husband and wife?

A. Yes.

3 Q. Has the Plaintiff been a resident of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit?

A. Yes.

4 Q. There is one child as the result of this marriage, you know that, dont you.

A. Yes.

5 Q. Do you think that Mrs. Mason is the fit and proper party to have the care and custody of the child?

Walter Green.

A. Yes.

6 Q. And is she able and willing to support, educate and rear the child with some assistance from her husband?

A. Yes.

7 Q. What was her conduct towards her husband while living together?

A. Kind and affectionate.

8 Q. State whether or not she was always a kind, affectionate and faithful wife?

A. Yes.

9 Q. Are the parties to this suit living together now?

A. No.

10 Q. Which left the other?

A. He left her.

11 Q. When?

A. Two years ago.

12 Q. The Plaintiff has testified that it was October 1919, will you state whether or not that is about right?

A. That is about the time.

13 Q. She has charged her husband with adultery - what do you know about that.

A. Well, I used to have a room at this house 1334 Carpenter street, and of course, I saw a whole lot go on in there.

Walter Green.

14 Q. Tell what you saw

A. Of course, I have seen him come on and undress and get in bed along side of the woman; that is as far as I saw.

15 Q. Do you mean that he was living with this woman in adultery?

A. Yes.

16 Q. And how did you happen to see him get into the bed or go into the bed room with her.

A. Every night that I was up there when I came in I would see them; I had a room there.

17 Q. During what period of time was this?

A. That was about a year ago.

18 Q. Since the separation between Mr. and Mrs. Mason.

A. Yes.

19 Q. Outside of what you personally saw while living in the house, did he or not admit his adulteries to you with this woman?

A. Yes.

20 Q. Has Mrs. Mason forgiven or condoned the offense of adultery of her husband?

A. No sir.

21 Q. Has she lived or cohabited with him since October 1919?

Walter Green.

A. No sir.

22 Q. And you say that night after night you would see him enter the bed room with this woman.

A. Yes.

23 Q. You know this because as you say you lived in the same house with them.

A. Yes; I was living on the third floor and they were on the second, and every time that I went to bed I had to pass their door, and that is the way that I saw it.

24 Q. Everybody knew it.

A. Yes.

26 Q. They did not try to hide it.

A. No sir.

27 Q. Outside of what you personally saw, from your association with them, how long have they been maintaining these relations together?

A. About three or four years, but I only know of my own personal knowledge for the last year.

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 Green

No other witnesses being named or produced before me, I then, at the request of the Solicitor.....of the.....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.....at the City of Baltimore, in the State of Maryland.

A. de Russey Sappington

(SEAL).
Examiner.

There are.....Exhibits with these depositions, to wit:

Plaintiff's.....Exhibit.....

Defendant's.....Exhibit.....

A. de Russey 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.....days, on.....of which I was employed by the Plaintiff....., and on.....by the Defendant.....

A. de Russey Sappington

Examiner.

B-116/1920

In the Circuit Court
-No. 2 of
Baltimore City.

Randolph Mason

vs.

Minnie Mason.

Minnie Mason

vs.

Randolph Mason.

Agreement as to the Custody
and maintenance of minor child.

B-20681

~~20681~~ 1167

15

ROY S. BOND
ATTORNEY AT LAW
215 ST. PAUL PLACE
BALTIMORE, MD.

FILED 6th February 1922

The Daily Record Co. Print, Baltimore, Md.

RANDOLPH MASON

VS.

MINNIE MASON

and

MINNIE MASON

VS.

RANDOLPH MASON

In the Circuit Court,

No. 2 of

Baltimore City.

AGREEMENT AS TO CUSTODY AND MAINTENANCE OF MINOR CHILD:

It is agreed by and between the parties in the above entitled cause, that in the event that a decree of divorce, A Vinculo Matrimonii, be passed in said cause, the permanent care, custody and guardianship of Maurita Mason, aged seven years, the infant child of the parties to this cause, be awarded the mother, Minnie Mason and that the father, Randolph Mason shall contribute Five (\$5) dollars per week, same to be paid through the Prisoner's Aid Association, for the support and maintenance of the said minor child, until she shall have reached the age of sixteen years, pending the further order of the Court.

It is expressly understood that this agreement is made subject to the approval of this Honorable Court.

Minnie Mason
Mother.

x Randolph Mason
Father.

R. M. Bond
Sol. for Plaintiff,
in Cross-Bill.

C. W. [Signature]
Sol. for Respondent
in Cross-Bill.

116-20

116
1920

B

Circuit Court

Docket No. _____

RANDOLPH MASON

VS.

MINNIE MASON.

and

MINNIE MASON

VS.

RANDOLPH MASON.

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file,

R. M. Bond

Solicitor for Plaintiff.

No.

B-20681

L 177

Filed

6th February

1922

RANDOLPH MASON

VS.

MINNIE MASON

and

MINNIE MASON

VS.

RANDOLPH MASON.

*In the Circuit Court
of Baltimore City*

January

TERM 19__

To the Honorable

The

Judge of Said Court:

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

Solicitor for Plaintiff,

Solicitor for Defendant.

Circuit Court

116
19 20

Docket No. B-60

Mason

vs.

Mason

Order of Reference
and Report

bal

No. B-70681

187

Order Filed 7th day of Febr 1922

Report Filed.....day of.....19

IN THE
Circuit Court

OF

BALTIMORE CITY

January Term, 1922

Randolph Mason
vs
Minnie Mason
and
vs.

Minnie Mason
vs
Randolph Mason

This case being submitted, without argument, it is ordered by the Court, this 6th day of February, 1922, that the same be and it is hereby referred to Ward B. Cox, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Carroll J. Bond

Report of Auditor and Master

Bill for divorce a vinculo matrimonii filed by the husband against his wife on the ground of adultery, and cross bill for same relief, for the custody of the minor child of the parties and for the resumption of her maiden name filed by the wife against her husband on the same ground. Code 1911 Art. 16 secs. 36-41.

Defendant to each bill ~~submitted~~ answers by solicitor.
Testimony taken on behalf of plaintiff in cross bill.

Residence of plaintiff in cross bill in Baltimore City for more than two years proven.

The marriage proven.

The adultery of defendant to cross bill proven.

An agreement between the parties as to the custody and support of said child has been filed and its terms are incorporated in the decree submitted.

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

Case submitted and ready for decree.

Ward B. Cox
Auditor and Master

February 8, 1922.

CIRCUIT COURT

B 116
1920

No. 60 Docket

Randolph Mason
vs.
Minnie Brooks Mason

Cross Bill VSX

Minnie Brooks Mason
vs.
Randolph Mason

Recorded

Folio 40 1922

Decree of Divorce

B 20681

B No.

(19)

led 15 February 1922

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

Ward B. Cur
Auditor and Master.

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

Randolph Mason
vs.
Minnie Brooks Mason

~~VSX~~

Cross Bill

Minnie Brooks Mason
vs.
Randolph Mason

Term, 1922

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

It is thereupon, this 15th day of February, A. D. 1922

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said

----- Minnie Brooks Mason -----
in the cross bill

the above named Complainant/be and She is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, to the cross bill, the said Randolph Mason, and that the original bill of Randolph Mason vs. Minnie Brooks Mason be and the same is hereby dismissed.

And it is further ordered that said Minnie Brooks Mason shall have the guardianship and custody of Maurita Mason, the minor child of the parties in the proceedings mentioned, and that said Randolph Mason shall pay said Minnie Brooks Mason the sum of five dollars (\$5.00) per week, accounting from the date of this decree, for the support and maintenance of said child, until she shall reach the age of sixteen years, or until the further order of this court, said payments to be made through the Prisoners' Aid Association of Maryland.

And it is further ordered that said Minnie Brooks Mason be and she is hereby authorized to resume her maiden name--Minnie Brooks.

And it is further Ordered, That the said Randolph Mason ----- pay the cost of this proceeding.

Carroll J. Bond