

In The Circuit Court  
of Baltimore City ~~494~~  
~~1919~~

Marnie Plummer

vs

John Plummer

Bill for Divorce & annals.

Mr Clerk please file

(Edward Davis atty  
118 E. Lexington St.

B19731

(1)

FILED

August 1919

Mamie Plummer

In The Circuit Court

Vs.

of

John Plummer

Baltimore City

-----  
To The Honorable, The Judge of Said Court:

Your Oratrix, complaining, respectfully states:

**FIRST**, That the parties hereto, were married in Sparrow's Point, state of Maryland on or about the 20th. day of April, 1916 by Rev. Booker, a minister of the gospel; and they lived together as man and wife until the 21st. day of April, 1919.

**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 any just cause or reason abandoned and deserted her, 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 and final, and beyond any reasonable hope or expectation of reconciliation.

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

**FIFTH**, That there is one minor child, Allison, born of the parties to this suit.

**SIXTH**, That Your Oratrix is without the means to defray the expenses of this litigation and that the defendant is employed, earning about \$30 per week, and she is advised by counsel that she is entitled to have an order passed by This Honorable Court, awarding her a certain sum as alimony during

the progress of this suit, permanent alimony for the support of the aforesaid minor child, and a further sum to compensate her solicitor for his services in the cause.

WHEREFORE YOUR ORATRIX PRAYS:

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

b-Permanent for the support of herself and minor child.

c-Such other and further relief as the case may require, including alimony pendente lite and counsel fee in such sums as this Honorable Court may think proper.

May it please Your Honor to grant unto Your Oratrix a writ of subpoena, directed unto said defendant, 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.

*Mamie Plummer*  
Complainant

*P. J. Davis*  
Solicitor for Complainant

State of Maryland )  
                          ) To Wit  
City of Baltimore )

I hereby certify that on this 13<sup>th</sup> day of Aug, 1919, before me the subscriber, a Notary Public in and for the <sup>County</sup> ~~city~~ of Baltimore, state of Maryland aforesaid, personally appeared Mamie Plummer, Complainant in the foregoing bill and made oath in due form of law that the matter contained therein was true to the best of her knowledge and belief.

*Arthur H. Rogers*  
Notary Public

220

494 Ct. Ct.  
191 9 B. 59 Docket No.

Plummer

Plummer  
2434 Buchanan St

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B 19731  
(2)

Filed 11 Aug 1919  
J. Stewart Davis  
SOLICITOR

16

summoned and a copy of the process left  
with the defendant.

Thomas J. McShulty  
Sheriff.

(Carke) 9/19

Jan 20 50

EQUITY SUBPOENA

The State of Maryland

To

*John Plummer*

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

*Maime Plummer*

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 *5* 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.”

59 B Docket 494  
1919

**CIRCUIT COURT.**

*Plummer*

vs  
*Plummer*  
2434 Buchanan

**Order For Alimony**  
Pendente Lite.

ORDER

**B No. 19.7.31**

*1 chkd (3)  
#30a Hecks*

*Fd.: 6 August 1919*  
16

*Copy of the within Order of Plaintiff served on  
John P. Plummer on the 6<sup>th</sup> day of August, 1919  
in presence of William H. Parks,  
Thomas J. M. Multy  
Sheriff.*

*L. W. #0 58*

IN THE  
**CIRCUIT COURT**  
OF  
**BALTIMORE CITY**

Mamie Plummer  
vs.  
John P. Plummer

July TERM, 191 9

ORDERED BY THE COURT this 6 day of August 191 9

that the defendant

John P. Plummer  
Mamie Plummer

pay to the plaintiff

the sum of

Seven 50 (\$7.50)

Dollars per week, during the continuance of this suit, accounting from the

day of August 191 9 to the said plaintiff

Mamie Plummer

as alimony, *pendente lite* unless cause to the contrary be shown on or before the 21

day of August 191 9, provided a copy of this Order be served on the said defendant

John P. Plummer on or before the 14

day of August 191 9

Carroll T. Bond

TRUE COPY—TEST:

CLERK.

IN THE CIRCUIT COURT OF  
BALTIMORE CITY

*B 494*

MAMIE PLUMMER

VS

JOHN P. PLUMMER

*1919*

ANSWER TO ORDER NISI.

Mr. Clerk:-

Please file.

*Harry O. Levin*

SOLICITOR FOR RESPONDENT.

*B 19731*

*(4)*

HARRY O. LEVIN

ATTORNEY AT LAW

443-453 CALVERT BUILDING

BALTIMORE, MD.

*Oct 21 1919*



MAMIE PLUMMER : IN THE CIRCUIT COURT  
 :  
 vs : OF  
 :  
 JOHN P. PLUMMER : BALTIMORE CITY.

.. .. .

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

Your Respondent, for answer to the Order of this Court, requiring him to pay alimony pendente lite, respectfully shows:-

That he is not possessed of such estate nor does he earn such income as to carry out the provisions of said order.

WHEREFORE he prays that the same may be hence dismissed with his reasonable costs.

  
Solicitor for Respondent.

3/12/1919

In the Circuit Court  
of  
Baltimore City

---

Mamie <sup>B 494</sup> Plummer  
1919

John <sup>W.</sup> Plummer

---

Answer

---

B 19 7 3 1

Mr. Clerk →

Please file

Harry Olevin  
Soc for Dept

---

HARRY O. LEVIN

ATTORNEY AT LAW

443-453 CALVERT BUILDING

BALTIMORE, MD

pd 8 Sept 1919

MAMIE PLUMIER : IN THE CIRCUIT COURT  
vs : OF  
JOHN <sup>W.</sup> PLUMIER : BALTIMORE CITY.

.....

TO THE HONORABLE, THE JUDGE OF SAID COURT:


Your Respondant, for answer to the Bill of Complaint filed in this case respectfully shows:-

- (1) He admits the allegations contained in the first, and second paragraphs.
- (2) He neither admits nor denies the allegations contained in the third and fourth paragraphs and demands strict proof thereof.
- (3) He admits the allegation contained in the fifth paragraph.

HAVING fully answered as he is advised, he prays that the said Bill of Complaint may be hence dismissed with his reasonable costs.

AND, as in duty bound, etc.

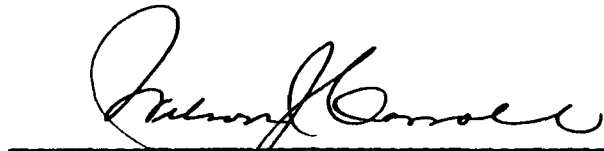
  
Solicitor for Respondant.

  
Respondant.

STATE OF MARYLAND:  
TO WIT:  
CITY OF BALTIMORE:

I HEREBY CERTIFY that on this <sup>8<sup>th</sup></sup> day of <sup>Sept</sup> ~~August~~, in the year one thousand nine hundred and nineteen, before me, the subscriber, a Notary Public of the State of Maryland, in and for Baltimore City aforesaid, personally appeared John W. Plummer, and he made oath in due form of law that the matters and facts above set forth are true and bona fide to the best of his knowledge, information and belief.

AS WITNESS my hand and Notarial Seal.

  
Notary Public.

494 Cir. Ct.

191 *B 59* Docket No. ....

*Plummer*

vs.

*Plummer*

**GENERAL REPLICATION**

Mr. Clerk,

Please file,

*B 19731*

*(John J. Davis)*

Solicitor for Plaintiff.

*(6)*

No. ....

Filed *16 Sept* 191*9*

OF BALTIMORE CIVIL CIRCUIT COURT

Plummer  
vs.  
Plummer

In the CIRCUIT COURT  
of Baltimore City

May TERM 1919

The Plaintiff join Issue on the matters alleged in the answer of

defendant

so far as the same may be taken to deny or avoid the allegations of the bill,

[Signature]

Solicitor for Plaintiff.

*in card*

**CIRCUIT COURT**

*494*  
*1919* / *9/359* Docket No.

---

*Pleasant*

---

vs.

*Pleasant*

---

Order

19

---

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

*B 19731*

No. ....

*can*  
*<7>*

*16 Sept* 1919

Fd

*Plummer*

.....

*Plummer*

vs.

.....

.....

IN THE  
**Circuit Court**  
OF  
BALTIMORE CITY

To the Honorable the Judge of the  
Circuit Court of Baltimore City:

THE PETITION OF *Marion Plummer*

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

*[Signature]*  
Solicitor for

ORDERED, this *16<sup>th</sup>* day of *September* 19*19*, 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.

*James M. Reebler*

.....

J. Stewart Davis

39  
494 B59  
1919 No.

Ct. Ct.  
Docket.

Plummer

vs.

Plummer

MOTION FOR HEARING

can

No.

B  
19731  
(8)

H. W. Lanni

Filed

7

day of

Oct 19 19



Mary Plummer

vs.

John Plummer

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY

The

Plummett

by

J. Steven Davis

Solicitor applies to have the above entitled cause placed on the Trial

Calendar for hearing *on almost*

in conformity with the First Equity Rule.

*(J. Steven) Davis*

Solicitor for

*Plummett*

Served on  
Harry O. Lewis

Service admitted  
this 15<sup>th</sup> day of  
October 1919

Harry O. Lewis  
Sgt. for Defendant

494 B Ct. Ct.  
1919 No. 59 Docket.

Plummer

vs.

Plummer

**NOTICE OF HEARING**

B No. 19731

(9)

No.

Filed 10 day of Oct 1919

Copy of the within Notice served on Harry O. Lewis,  
Solicitor on the 15<sup>th</sup> day of October 1919 in the presence  
of Edward J. Farley  
Thomas F. McNeely  
Sheriff  
Fees \$0-50.

Mamie Plummer

v

John Plummer



IN THE

**CIRCUIT COURT**

OF BALTIMORE CITY

Upon application made by the Solicitor for the.....

Plaintiff

the above entitled cause has been placed upon the trial Calendar

in accordance with the provisions of the First Equity Rule, and

the same will stand for hearing on..... *Alimony pendente lite*

.....  
.....  
when reached in due course on the said calendar.

**CHARLES R. WHITEFORD,**

True copy

Test:

*Clerk Circuit Court.*

Clerk.

Docket ..... B. 494/1919 .....

IN THE CIRCUIT COURT .....

.....  
Mamie Plummer  
.....

vs

.....  
John Plummer  
.....

**DEPOSITIONS**

*B* No. *19731*  
*1105*

**PLAINTIFF'S COSTS**

Examiner..... \$ 8.00  
Copies .....  
Notices .....  
Sheriff .....  
Stenographer ..... 1.50

.....  
\$ 9.50 Paid.

**DEFENDANT'S COSTS**

Examiner..... \$ .....  
Copies .....  
Notices .....  
Sheriff .....  
Stenographer .....

.....  
\$ .....

.....  
ALFRED J. CARR, Examiner  
.....

Filed *14* day of *Nov* 19 *19*

\_\_\_\_\_

      Mamie Plummer      

\_\_\_\_\_

vs

      John Plummer      

\_\_\_\_\_

\_\_\_\_\_

In the Circuit Court \_\_\_\_\_

OF BALTIMORE CITY

\_\_\_\_\_

      The above entitled 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, 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  
      16th       day of       September             1919      , met on  
the       17th       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       22nd       day of       September        
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:—

NOTE: Counsel for defendant duly notified but did  
not attend.

MAMIE PLUMMER, the Plaintiff, produced as a witness on her own behalf, being duly sworn, deposes and saith as follows- that is to say-

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Mamie Plummer, Sparrows Point; live at home with my mother.

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

A- I am Mamie Plummer and John P. Plummer is my husband.

BY MR. DAVIS:

3 Q- You were married when?

A- April 20th, 1916, to John Plummer, by Rev. Booker, in Sparrows Point.

4 Q- How long did you and your husband live together?

A- He deserted me the 21st of April, 1916, the next day.

5 Q- Did you do anything to cause him to leave you?

A- Nothing at all.

6 Q- Was your conduct towards your husband always kind and affectionate and above reproach?

A- Always kind and affectionate.

7 Q- And he abandoned you without just cause?

A- Yes sir.

8 Q- Has the desertion continued since that date?

A- Yes, he has been away all that time.

9 Q- Have you ever been together since then?

A- No, never been together since.

Mamie Plummer.

10 Q- Any hope of reconciliation?

A- No hope of reconciliation.

11 Q- You have never lived with him, never condoned, never forgiven the desertion?

A- No.

12 Q- Any children born?

A- One child, Allison, three years old.

13 Q- you are a citizen of the State of Maryland?

A- Yes sir.

14 Q- You want to keep your child, do you not?

A- Yes, indeed.

15 Q- You have been for more than two years before this bill was filed?

A- Yes sir.

16 Q- You have always had the child since its birth?

A- Yes indeed.

17 Q- It has never been with its father?

A - No indeed.

- - - - -

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 to 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.*  
*Mamie Plummer*



MARY E. FINNEY, 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 E. Finney, Sparrows Point, housewife.

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

A- Mrs. Plummer is my daughter and Mr. Plummer, her husband.

BY MR. DAVIS:

3 Q- You recall when Mr. and Mrs. Plummer were married?

A- I was present at their marriage, April 20th, 1916.

4 Q- Do you know when John P. Plummer deserted Mrs. Plummer?

A- That was the next day, April 21st, 1916.

5 Q- Mrs. Plummer, of course, has been a resident of the State of Maryland for more than two years before this bill was filed?

A- Yes, sure.

6 Q- Was Mrs. Plummer's conduct toward her husband always kind and affectionate and above reproach?

A- Yes indeed.

7 Q- Was she responsible for her husband deserting her?

A- No sir.

8 Q- Have they lived together since the desertion?

A- Not a minute.

9 Q- And she has never condoned or forgiven the offence?

A- No sir.

Mary E. Finney.

10 Q- You know there is one child born as result of that marriage?

A- Yes, Allison.

11 Q- That child is how old?

A- Three years old.

12 Q- Is there any hope of reconciliation?

A- No possible hope of reconciliation.

13 Q- And the desertion has continued uninterruptedly for at least three years prior to the deed of filing the bill?

A- Yes 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 your examination or the matters in question between the parties? If so, state the same fully and at large in your answer .

Answer: *No.*

*May I ever find you.*

SARAH E. SCOTT, 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- Sarah E. Scott, Sparrows Point, housewife.

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

A- I do. I am a sister to Mrs. Plummer.

BY MR. DAVIS:

3 Q- Do you know when Mrs. Plummer was married to John P. Plummer?

A- April 20th, 1916.

4 Q- How long did they live together?

A- Until the next day; he left April 21st, 1916.

5 Q- Mrs. Plummer is a resident of Maryland and has been for more than two years before this bill was filed?

A- Yes.

6 Q- Was the conduct of Mrs. Plummer toward her husband always kind, affectionate and above reproach?

A- Yes sir.

7 Q- Did she give him any cause to leave her?

A- None whatever that I seen.

8 Q- Has the desertion continued uninterruptedly for more than three years before this bill was filed?

A- Yes, since 1916.

9 Q- Is there any hope of a reconciliation, of their getting

Sarah E. Scott.

together again?

A- No hope at all.

10 Q- Has he ever lived with her since he deserted her?

A- No sir.

11 Q- Ever cohabited with her?

A- No.

12 Q- Has she ever forgiven him?

A- No sir.

13 Q- There is one child and that child has always been in the custody of Mrs. Plummer?

A- Yes sir, Allison Plummer.

- - - - -


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 to 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*

*Garth E Scott*

No other witnesses being named or produced before me, I then, at the request of the solicitor \_\_\_\_\_ of the Plaintiff \_\_\_\_\_ closed the depositions taken in said cause, and now return them closed under my hand and seal, on this 14<sup>th</sup> day of November in the year of Our Lord nineteen hundred and nineteen at the City of Baltimore in the State of Maryland.

Alfred J. Carr   
Examiner.

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

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

Alfred J. Carr  
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 \_\_\_\_\_.

Alfred J. Carr  
Examiner.

494 Circuit Court

19 19 1809 Docket No. \_\_\_\_\_

Wm. Rummel

vs.

John Rummel

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file,

(John) Rummel

Solicitor for Plaintiff.

No. B

19431  
(10)

Filed

17 Nov

19 19



Mami Plummer

John Plummer vs.

In the Circuit Court of Baltimore City

Sept 1 TERM 1917

To the Honorable

Judge of Said Court:

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

[Empty lines for text]

(John) Davis

Solicitor for Plaintiff,

[Empty lines for text]

[Handwritten initials]

Harry O. Levin

Solicitor for Defendant.

490  
19 19 359 Docket No.

Plummer

vs.

Plummer

**Order of Reference.**

Col

B 19431  
(11)

Filed 17 day of Nov 19 19

Mame Plummer

John Plummer

IN THE  
**CIRCUIT COURT**

OF  
BALTIMORE CITY

Nov Term, 19 19

This case being submitted, without argument, it is ordered by the Court, this 17 day of  
November 1919 that the same be and is hereby referred to Ward B Coe Esq.,

Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

James P. Gorton

**Report of Auditor and Master**

Bill for divorce a vinculo matrimonii and for permanent alimony filed by the wife against her husband on the ground of abandonment. Code 1911, Art. 15, secs. 36-41.

Defendant summoned and answers by solicitor.

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

The marriage proven.

The abandonment for three years, its finality and the irreconcilability of the parties proven.

Case made for giving the custody of the minor child of the parties to the plaintiff.

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

Case submitted and ready for decree.

Ward B. Coe  
Auditor and Master.

Fee \$9 paid.

November 19th, 1919.

59 B 494  
1919

Runna

"  
Runna.

Ol

B 19 431  
(12)

A 23 12 1469

ANNIE PLUMMER

:

IN THE CIRCUIT COURT

vs

:

OF

JOHN PLUMMER

:

BALTIMORE CITY.

:

.. .. .

TO THE HONORABLE, THE JUDGE OF SAID COURT:

It is agreed by and between Counsel for the respective parties that, in the event of a decree a vinculo matrimonii, the Plaintiff shall be awarded the custody of the infant child, Allison Plummer, without alimony, it being agreed that the Defendant shall be relieved from the payment of any money for the support and maintenance of the said infant child.

Solicitor for Plaintiff.

Solicitor for Defendant.

✓372

# CIRCUIT COURT

B-494-

1919.

No. 59 Docket

MAMIE PLUMMER

VS.

JOHN PLUMMER.

## Decree of Divorce

B  
B No. 19431  
(13)

fd 28 November 1919

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

Ward B. Cox  
Auditor and Master.

Decree of Divorce

IN THE

**Circuit Court**

OF

BALTIMORE CITY

MAMIE PLUMMER

VS.

JOHN PLUMMER

*Nov*

Term, 19 19.

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

It is thereupon, this *28* day of *November*, A. D. 1919,

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said Mamie Plummer the above named Complainant be and she is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, the said John Plummer.

AND IT IS FURTHER ORDERED that said complainant shall have the guardianship and custody of Allison Plummer, the minor child of the parties in the proceedings mentioned, and that said defendant shall be charged with the support and maintenance of said minor child, until the further order of this Court.

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

*James P. Gortén*