

IN THE CIRCUIT COURT

OF  
BALTIMORE CITY

*B 484*  
JEROME REED *1922*

VS.

MARTHA REED  
*1832 Ashland Ave.*

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

*B 24 222*  
*[Signature]*  
SOLICITOR FOR COMPLAINANT *(11)*

DAVIS & BISHOP

ATTORNEYS AT LAW

*B 280 August 1922*  
BANKERS BUILDING

14 E. PLEASANT ST.

BALTIMORE, MD.

JEROME REED  
VS  
MARTHA REED

:  
:  
:  
:  
:

IN THE CIRCUIT COURT  
FOR  
BALTIMORE CITY.

-ooo O ooo-

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:-

FIRST: That he was married to his wife, Martha Reed, the 7th day of October, 1885, in Baltimore, City, Maryland by one Rev. Steele, and with whom he resided until about the 15th day of October, 1907.

SECOND: That though the conduct of your orator toward the said Martha Reed has always been kind, affectionate and above reproach, she has, without just cause or reason abandoned and deserted him and has declared her intention to live with him no longer, and that such abandonment has continued uninterruptedly for more than three years and is deliberate and final and that the separation of the parties is beyond any reasonable expectation of reconciliation.

THIRD: That there are no minor children as result of said marriage.

FOURTH: That your orator has not lived or co-habited with said defendant since said desertion.

FIFTH: That the defendant is a citizen of the State of Maryland, having resided in Baltimore City for more than three years.


TO THE END, THEREFORE:

(a) That your orator be divorced a Vinculo Matrimonii from the said defendant, Martha Reed.

(b) That he 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 against the said Martha Reed, commanding her 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 degree or order as may be passed therein.

AND as in duty bound, etc.

  
\_\_\_\_\_  
SOLICITOR FOR COMPLAINANT.

EQUITY SUBPOENA  
The State of Maryland

580 box

484 1364 Ct. Ct.  
192 21 Docket No.

Reed

Reed

1822 Ashland

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pro  
No. 24220  
(2) (3)

Filed 11 Sept 1922  
J. S. Davis SOLICITOR  
" 9 Oct "

Ver 1194

You Eat  
(McKinley)

Thomas J. McKinley  
Sheriff

9/15 1922  
ISSUED TO October Return Day, 1922  
Summoned and a copy of the Process left with the defendant.  
Thomas J. McKinley Sheriff  
\$100.80  
10/7/22



EQUITY SUBPOENA

The State of Maryland

On

*Martha Reed*

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

*Jerome Reed*

against you exhibited in the Circuit Court of Baltimore City,

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

WITNESS, the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the **10<sup>th</sup>** day of **July** 192 **2**

Issued the **28** day of **August**, in the year 1922

**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.)

484 B62 Ct. Ct.  
1912 Docket

Jrome Reed  
vs.

Martha Reed

**Decree Pro Confesso.**

B 24222  
No.

Sep 4

Filed 6 November 1912



Jerome Reed

vs.

Maudha Reed

IN THE  
Circuit Court  
OF  
BALTIMORE CITY.

Term, 1912

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 6 day of November in the year nineteen hundred and twenty two 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.

Carroll J. Bond

STATE OF MARYLAND,  
BALTIMORE CITY, SCT :

I hereby certify that on this \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_ before me, the subscriber, a Notary Public, of the State of Maryland, in and for the City aforesaid, personally appeared \_\_\_\_\_ 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.

Notary Public.

✓  
CIRCUIT COURT

B 484  
1922

No. Docket

Jerome Reed

VS.

Martha Reed.

Recorded

Folio 24 1923

Decree of Divorce

B No. 24222

5

14 February 1923

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

*May A. D. ...*  
Auditor and Master.



Decree of Divorce

IN THE

**Circuit Court**

OF

BALTIMORE CITY

.....Jerome Reed.....

VS.

.....Martha Reed.....

.....January.....

.....Term, 19 23.....

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

It is thereupon, this 1<sup>st</sup> day of February, A. D. 1923.

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

Jerome Reed

the above named Complainant be and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, Martha Reed

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

*Henry Duboy*

484  
19 22

662

Docket No. ....

Reed

US.

Reed

**Order of Reference.**

B 24 22 2  
6

Filed 31 day of Jan 19

23

484

Jerome Reed  
vs.  
Mattha Reed

IN THE  
**CIRCUIT COURT**  
OF  
BALTIMORE CITY

Jan Term, 1923

This case being submitted, without argument, it is ordered by the Court, this <sup>31</sup> day of January 1923, that the same be and is hereby referred to Alex H Robertson Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

*[Handwritten signature]*

**Report of Auditor and Master**

Bill filed by husband against wife for divorce a vinculo matrimonii on ground of abandonment for three years, Code Art. 16, Sect. 36. Order of Defendant summoned, no answer, decree pro confesso, thirty days elapsed. Proof shows marriage, non-residence of plaintiff, residence of defendant and abandonment by defendant for at least three years, continuous, deliberate, final and without hope of reconciliation. Case ready for decree. reconciliation. Case ready for decree.

*[Handwritten signature]*  
Auditor & Master.

484



3/12/14 26

Doc. B 484  
1922

**In the Circuit Court,**  
**OF BALTIMORE CITY**

**DEPOSITIONS**

*Jerome Reed*

vs.

*Martha Reed*

No. 24222B

**PLAINTIFF'S COSTS**

Examiners.....	\$	<u>5<sup>00</sup></u>
Copies.....		
Sheriff.....		
Stenographer.....		<u>2<sup>00</sup></u>
	\$	<u>10<sup>00</sup></u>

**DEFENDANT'S COSTS**

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

*31 Jan 1923*



Jerome Reed

vs.

Martha Reed

In the Circuit Court

OF BALTIMORE CITY.

----- Secret Pro Confess having  
 been passed in said cause  
 and notice having been given me by the Solicitor for the Plaintiff  
 of a desire to take testimony in the same, I, A. de RUSSY SAPPINGTON, one  
 of the Standing Examiners of the Circuit Courts of Baltimore City, under and by  
 virtue of an order of the above named Circuit Court, passed in said cause on the  
 sixth day of November 1922, met on  
 the eighth day of November in the year nineteen  
 hundred and twenty-two at my office, in the City of Baltimore, in the State  
 of Maryland, and assigned the ninth day of November  
 in the same year at three o'clock in the afternoon and the  
 office of J. Stewart Davis, Esq. in the City and State  
 aforesaid, as the time and place for such examination of witnesses in said cause;  
 at which last mentioned time and place I attended, due notice of such meeting  
 having been given, and proceeded in the presence of the Solicitor of the  
 Plaintiff to take the following depositions, that  
 is to say:—

444  
8-2 B

Reed,

v.

Reed.

Testimony taken at the office of Mr. Davis,  
st. Paul Place, Baltimore, Maryland, November  
9th., 1922, at three O'clock P. M.

JEROME REED, a witness of lawful age, produced  
on behalf of the Plaintiff, having been first duly  
sworn, deposes and saith as follows, that is to  
say:

BY THE EXAMINER:

1 Q. State your name residence and occupation?

A. Jerome Reed, 1145 South 20th., Street; Philadel-  
phia, Pennsylvania; merchant.

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

A. I am the Plaintiff and my wife is the Defen-  
dant.

BY MR. DAVIS:

1 Q. When were you married?

A. 7th., October 1885.

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

A. Yes.

3 Q. In Baltimore City?

A. Yes.

4 Q. By a Religious Ceremony?

Jerome Reed.

A Yes.

5 Q. Are you a resident of Baltimore, Maryland?

A. I was born here, but I am not living here now.

6 Q. Where is your wife living?

A. She lives at 1832 Madison Street.

7 Q. Is she a resident of Baltimore City, State of Maryland, and has she been for more than two years prior to the filing of this suit?

A. Yes.

8 Q. Are there any children as the result of this marriage, - any minor children?

A. No.

9 Q. What was your conduct towards your wife while living together?

A. I treated her like a husband should treat a wife.

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

A. Yes.

11 Q. Are you and your wife living together now?

A. No sir.

12 Q. Which left the other?

A. She left me.

13 Q. When?

A. She left me about October 1907.



## Jerome Reed

A. She left me about October 1907.

13 Q. Did she have any just cause or reason to abandon and desert you at that time?

A. No sir.

14 Q. What did she say and what did she do on this day?

A. She did not say or do anything, only when I went to work, she and I had had a talk, and when I came back everything was gone.

15 Q. Did you go to her after that time and try to get her to come back and live with you and do as a wife should.

A. I went to her and I told her to come home; that it was her duty to come home.

16 Q. What did she say?

A. She said that she did not want me any more.

17 Q. Has her abandonment of you continued uninterruptedly since October 1907?

A. Yes.

18 Q. State whether or not her abandonment of you was deliberate and final?

A. Yes.

19 Q. State whether or not there is any reasonable expectation of a reconciliation?

A. None in the world.



Jerome Reed.

20 Q. Where did this abandonment of you by your wife  
take place?

A. In Baltimore, Maryland.

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, of the matters in question between th parties? If so, state the same fully and at large in your answer/

A.---

*No*

*James D. Ford*

*no*

MARY FERGUSON, 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. Mary Ferguson, 800 S<sup>th</sup>uter Street; domestic.

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

A. Yes. He is my Uncle.

BY MR. DAVIS:

1 Q. Are the parties to this suit 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. Is the Plaintiff at the present time a resident of the State of Maryland.

A. Nossir.

4 Q. Is the Defendant, Mrs. Reed, a resident of the State of Maryland?

A. Yes.

5 Q. And has she resided in Baltimore City, State of Maryland, for at least two years prior to the filing of this suit?



Mary Ferguson.

A. Yes.

6 Q. Are there any minor children as the result of this marriage?

A. No sir.

7 Q. What was her conduct towards her husband while living together; how did she behave herself.

A. Indeed, sir, I do not know; the only thing that I know is that she left him.

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

A. Yes; always good to him.

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

A. No sir

10 Q. Which left the other?

A. She left him.

11 Q. When?

A. About October 1907.

11 Q. Did she have any just cause or reason to abandon and desert her husband at that time?

A. No.

12 Q. State what she said and did on that occasion.

A. She just said that she did not want him and would not live with him; that is all that I heard her say.

13 Q. Did you hear her say that on the day she left.

A. No sir; I did not hear her say that on the day she



Mary Ferguson.

left, but I have heard say it since she left, three or four times,- since she left. On the day of the separation my Uncle came to my house and told me that his wife had left him; shortly after that time I saw Mrs. Reed and had a talk with her, and she told me that she had left her husband, and did not intend to live with him any more; since that time she has made the same remark three or four times.

14 Q. Has her abandonment of her husband continued uninterruptedly since October 19 07?

A. Yes.

15 Q. Have they lived or cohabited together since that time?

A. No sir.

16 Q. State whether or not said abandonment was deliberate and final; did she deliberately and finally abandon and desert her husband?

A. Yes.

17 Q. State whether or not there is any reasonable expectation of a reconciliation; do you ever expect them to make up and live together again?

A. No.

18 Q. Where did this abandonment and desertion take place.

A. In Baltimore, Maryland.

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, of the matters in question between th parties? If so, state the same fully and at large in your answer/

A. --- *no*

Rev  
Mary ~~X~~ Ferguson  
mch

*adest*  
*(John) Davis*

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 31<sup>st</sup> day of January in the year of Our Lord nineteen hundred and twenty three at the City of Baltimore, in the State of Maryland.

A. de Russey Sappington (SEAL).  
Examiner.

There are one..... 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 fore-going 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.....

A. de Russey Sappington  
Examiner.