

IN THE CIRCUIT COURT

OF  
BALTIMORE CITY.

WILLIAM ROBINSON

VS.

LAURA ROBINSON

519 Pink Alley  
Have De Grace Md

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

*J. Steward Davis*

ATTORNEYS FOR PLAINTIFF.

*B 28-074*

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

WILLIAM ROBINSON : IN THE CIRCUIT COURT

VS. : OF

LAURA ROBINSON : BALTIMORE CITY.

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

I. That he was married to his wife, Laura Robinson, on the 19th day of October, 1918 and with whom he resided until the 4th day of July, 1924.

(2) That ever since said marriage, your Orator has behaved himself as a faithful, chaste and affectionate husband toward the said Laura Robinson.

3. That the said Laura Robinson has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned men, whose names to your Orator are unknown, and said offense has not been condoned by your Orator.

4. That there are no children as issue of said marriage.

5. That both your Orator and the defendant are citizens of the State of Maryland, <sup>he</sup> having resided in Baltimore City for more than three years prior to the filing of this Bill and the defendant left for Havre De Grace on or about the 4th day of July, 1924.

6. TO THE END, THEREFORE:

(a) That your Orator may be divorced A Vinculo Matrimonii from the said Laura Robinson.

(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 Laura Robinson, commanding and requiring 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 decree or order as may be passed therein.

AND as in duty bound, etc.

*Davis & Evans*  
SOLICITORS FOR COMPLAINANT.

Send + left copy  
27 Dec

Ct. Ct.

Received 23 day Dec 1924  
and forthwith delivered to the Sheriff  
Harford County.

B 884  
192 4 Docket No.

Test D. G. Wagon,  
CLERK

Robinson

vs.

Robinson

519 Bank Alley  
Harre D. Grace Md

SUBPOENA TO ANSWER BILL OF COMPLAINT

December 27 1924  
Summoned and Copy  
of subpoena and  
Bill of Complaint  
left with him

W. Thompson  
Sheriff

Sherriff's Office  
60¢

No. B28074  
(2)

Filed 29 Dec 192 4

Davis & Evans

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

To

Laura Robinson

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 January next cause an appearance to be entered for you and your answer to be filed to the complaint of William Robinson

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 10th day of November 1924 Issued the 11th day of December, in the year 1924

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)

884  
1924

Ct. Ct.

Docket 1364

Wm Roberson

vs.

Saura Roberson

Decree Pro Confesso.

Sup  
No.  
28074  
Sup (3)

Filed

W. Kelly 1925

Wm Robinson

vs.

Laura Robinson

Jan

IN THE  
**Circuit Court**

OF  
BALTIMORE CITY.

Term, 1925

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 26 day of February in the year nineteen hundred and twenty Five 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 the 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.

George A. Falter

*pd*  
Circuit Court

*884*  
19 *24* Docket No. *64B*

*W<sup>m</sup> Robinson*

vs.

*Saura Robinson*

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Order of Reference  
and Report

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*Lyon*

No. *B 28074*

*<4>*

Order Filed *26* day of *March* 19 *25*

Report Filed *15* day of *April* 19 *25*



9<sup>th</sup> - Robinson

vs.

Saura Robinson

IN THE  
Circuit Court

OF  
BALTIMORE CITY

Mar 2 Term, 1925  
16th

This case being submitted, without argument, it is ordered by the Court, this  
day of March, 1925 that the same be and it is hereby referred to  
Wm P Lyons, Esq., Auditor and Master, to report the  
pleadings and the facts, and his opinion thereon.

George A. Seltzer

Report of Auditor and Master

Bill for divorce a vinculo matrimonii filed by the husband against  
his wife on the ground of adultery. Article 16, Sections 36-41.

Defendant summoned and fails to answer.

Plaintiff's residence in Baltimore City for more than two years  
prior to the filing of the bill proven. Cause of divorce occurred in  
Maryland.

The marriage proven. Adultery proven.

Decree pro confesso was passed against the defendant and more than  
thirty days have since elapsed.

Case ready for decree.

William P. Lyons  
Auditor and Master

April 15, 1925

CIRCUIT COURT

B 884  
1924 No. Docket

WILLIAM ROBINSON

VS.

LAURA ROBINSON

Recorded

Vol 228 1925

Decree of Divorce

B No. 28074

Filed 16 April 1925

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

William P. Lyons  
Auditor and Master.

Decree of Divorce

IN THE

**Circuit Court**

OF

BALTIMORE CITY

.....WILLIAM ROBINSON.....

VS.

.....LAURA ROBINSON.....

.....March.....Term, 19 25..

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

It is thereupon, this *sixteenth* day of April - - - - - , A. D. 1925, by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said

..... WILLIAM ROBINSON, .....  
the above named Complainant be and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, LAURA ROBINSON.

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

*George A. Salvo*

Doc. B  $\frac{884}{1924}$

3/13/2/10

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

**DEPOSITIONS**

*William Robinson*

vs.

*Laura Robinson*

No. *28974 B*

**PLAINTIFF'S COSTS**

Examiners..... \$ 8<sup>00</sup>  
Copies.....  
Sheriff.....  
Stenographer.....  
\$ \_\_\_\_\_

**DEFENDANT'S COSTS**

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

*Fd. 26" March 1925*



William Robinson

vs.

Laura Robinson

In the Circuit Court

OF BALTIMORE CITY.

Decree Pro Confesso 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 twenty-sixth day of February 1925, met on the ninth day of March in the year nineteen hundred and twenty-five at my office, in the city of Baltimore, in the State of Maryland, and assigned the tenth day of March in the same year at two o'clock in the after-noon and the office of Messrs Paris & Evans in the City and State aforesaid, as the time and place for such examination of witnesses in said cause; at which last mentioned time and place I attended, due notice of such meeting having been given, and proceeded in the presence of the Solicitor of the Plaintiff to take the following depositions, that is to say:—

8-3

WILLIAM ROBINSON

VS.

LAURA ROBINSON.

Testimony taken before me, A. deRussy  
Sappington, one of the standing Examiners of the Supreme  
Bench of Baltimore City, at the offices of Mr. J. Stewart  
Davis, St. Paul Street, Baltimore, Maryland, on March  
10, 1925, at 2 o'clock in the afternoon.

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Thereupon---

WILLIAM ROBINSON,

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

1Q (By the Examiner): Please state your  
name, residence and occupation?

A William Robinson, Baltimore, Md; I follow  
the water.

2Q Do you know the parties to this suit or  
either of them?

A Yes, I am the plaintiff, and my wife is the defendant.

3Q (By Mr. Davis): When were you married?

A On the 19th of October, 1912.

4Q And where were you married?

A In Baltimore City.

5Q By whom were you married?

A A Minister of the Gospel.

6Q In the Bill of Complaint it is stated that you were married on the 19th of October, 1918. Is that correct?

A No. I was married in 1912.

7Q Did you live with your wife?

A Yes, until July 4th, 1924.

8Q Which left the other?

A Then she left me.

9Q Where were you when she left you?

A In Tapahannock, Virginia.

10Q Whom did she go away with?

A With another man, I forget the fellow's name. She went to West Point, Virginia with him.

11Q How did she get from Tapahannock, Virginia to West Point?

A In an automobile.

12Q Who drove them there?

A Randolph.

13Q What was your conduct towards your wife, how did you treat her?

A I couldn't treat her no better.

14Q Did you provide for her?

A Yes.

15Q Were you kind and affectionate?

A Yes, sir.

16Q Were you true to her?

A Yes, sir, I was.

17Q Did you give her any cause or reason to leave you and go with this other man?

A No, we went ashore just as pleasant, and she brought a man on board, and took my money and carried it off, \$235.00, and she went off with the other man.

18Q When did you find out she had gone with this man?



A The next morning. She went 12 or 1 o'clock that night, and I found it out nine in the next morning. She said she was going to stay in town, and for me to call for her in the next morning, and when I did she had gone. It was on the 4th of July, 1924.

19Q Any children as a result of this marriage?

A No, sir.

20Q Have you been a resident of the state of Maryland for more than two years prior to the time this case started?

A All my life.

21Q And your wife is a resident of the State of Maryland, and has been for more than two years?

A Yes. She is now residing in Havre de Grace, Maryland.

22Q Have you ever seen your wife with any men acting in a way that a married woman should not?

A Yes, sir.

23Q What did you see her do?

A I saw a man loving and kissing her.

24Q Where was that?

A Right aboard my boat.

25Q Who was this man?

A A fellow named Ned Jones.

26Q Since your wife left you on the 4th of July, have you discovered from other persons that she has committed adultery with other men?

A Yes, here in Baltimore City, but I don't know nothing of it myself. My witnesses know that.

27Q Did you ever see her kissing a man when you were about to board the boat in Baltimore City?

A Yes, she was kissing a man; this fellow named Ned Jones. I saw her sitting on his lap and kissing him. She was sitting on a man's knee in Spring Street, and I saw her.

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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

Willie Robinson

Thereupon---

SYLVESTER QUARRELS,

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

1Q (By the Examiner): Please state your name, residence and occupation?

A Sylvester Quarrels, 510 Spring Street; shore work.

2Q Do you know the parties to this suit or either of them?

A Yes, sir.

3Q (By Mr. Davis): Are they man and wife?

A Yes, sir.

4Q Did they live together as man and wife?

A Yes, they were man and wife.

5Q He held her out as his wife, and she held him out as her husband?

A Yes, sir.

6Q What was Mr. Robinson's conduct towards his wife?

A As far as I know, he worked hard, and supported her and treated her all right.

7Q Did she have to work?

A Didn't do a thing, but stay on the boat.

8Q Was he kind and affectionate to her?

A Yes, sir.

9Q Did he give her any cause or reason to commit the crime of adultery?

A No, sir.

10Q He alleges she has committed adultery, from information received from you, after she left him. What do you know about that?

A I know, around these sporting places.

11Q Where are these places?

A Down in East Baltimore, on the 200 block of Spring Street.

12Q Have you ever seen her in a house on the 200 block of Spring Street?

A Yes, sir.

13Q What was she doing in that house?

A Cutting up and drinking.

14Q Were there any men in there?

A Yes, drinking and loving the women.

15Q When was that?

A That was over a year ago now.

16Q Was it before or after the 4th of July?

A Oh, yes, before; over a year.

17Q Where was Mr. Robinson at that time?

A He was away on the water.

18Q After they got through drinking, what did they do at this house?

A They went upstairs in the house.

19Q Did she go upstairs with a man?

A Yes, sir.

20Q How long did they stay?

A It was about, to my judgment, about an hour or so.

21Q What can you do upstairs at this house?

A You can rent a room and get beds.

22Q What is the reputation of that house?

A It is a house where you can rent a room and go to bed with a woman.

23Q How often have you seen her at this or any other house?

A I have seen her around lots of different places, drinking and sometimes her husband would come and would be looking for her, and she would be around drinking and having a good time with men.

24Q How many times have you see her at houses and seen her go upstairs with a man?

A Several different times. I do not know exactly.

25Q With the same man?

A No, different fellows.

26Q After the separation, did you tell Mr. Robinson about it?

A Yes, I told him. She was not acting right. A man and a wife they were, and she was not acting right.

27Q How did you happen to be in these houses?

A I was there drinking. I drank very hard at one time. I used to go to them places and go upstairs, and have a little fun, and go on about my business.

28Q Has Mr. Robinson been a resident of the State of Maryland for more than two years prior to the time this case started?

A Yes, he has been a resident of the State of Maryland all his life. He goes to sea. He follows the water.

29Q And Mrs. Robinson, do you know where her home is?

A In Havre de Grace, Maryland.

30Q Any children as result of this marriage?

A No, sir.

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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 I ylfestus Jwales

Thereupon---

CHARLES KING,

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

1Q (By the Examiner): Please state your name, residence and occupation?

A Charles King, 504 South Spring Street, long shoreman.

2Q Do you know the parties to this suit or either of them?

A Yes, both of them.

3Q (By Mr. Davis): Were they man and wife?

A Yes, sir.

4Q Did they live together as man and wife?

A Yes, aboard the boat.

5Q They were considered by the community as man and wife?

A Yes, they were.

6Q There was a separation, now, which left the other?

A She left him on the 4th of July, 1924.

7Q What was his conduct towards his wife?

A Nothing I could see was inferior. He treated her all right. He supported her and was always kind and affectionate.

8Q Did she have to work?

A No, sir, just domestic duties, and not much of that.

9Q Did he give her cause or reason to commit the crime of adultery?

A No, sir.

10Q He states in his testimony that after she left him, you told him of some of her actions?

A Yes. I seen her in the underworld sections, around the 400 and 500 block of Spring Street, and in the houses where any man's wife can rent a bed. She was drinking and dancing, and finally they would disappear and go upstairs, her and a man, you understand, but I could not tell you what she done when she got upstairs. She went upstairs with the man.

11Q What can you do upstairs in these houses?

A Any kind of immoral purposes.

12Q What is the reputation of this house in the 400 block of Spring Street?

A A bed house, and a place where they sell liquor.

13Q Were you there yourself?

A I have been there, yes.

14Q Do you know who these men were?

A No, I don't know him by name.

15Q Was it generally the same man?

A No, different men. I seen her with two different men in that house.

16Q How long would she stay upstairs with the men?

A About an hour and a half, or longer.

17Q What was her condition as to sobriety?

A Half drunk sometimes, and sometimes just sober enough to know what she was doing, in this house. I have been gambling there and saw her. You can do anything there.

18Q After the separation on the 4th of July, 1924, did you tell Mr. Robinson about these things?

A I did, yes. What a pity it was for a man to be struggling on the hard ocean like he did, and then to be bit in the back.

19Q Has Mr. Robinson been a resident of the State of Maryland for more than two years prior to the time this case started?

A I knew him here over three years ago.

20Q And Mrs. Robinson, where does she live?

A He told me her home is in Havre de Grace, Maryland.

21Q Any children as a result of this marriage?

A No, they have no children.

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**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

Chas. King

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.....*26th*..... day of *March*..... in the year of Our Lord nineteen hundred and *twenty-five*..... at the City of Baltimore, in the State of Maryland.

*A. de Russey Sappington* (SEAL).  
Examiner.

There are *no*..... 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.....*two*..... days, on.....*Wed*..... of which I was employed by the Plaintiff....., and on.....*none*..... by the Defendant.....

*A. de Russey Sappington*  
Examiner.