

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

64 195

1924
ANITA B. SLATER

VS.

WILLIAM B. SLATER

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

B26741
J. Steward Davis
George W. Evans
ATTORNEYS FOR PLAINTIFF.

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE

Baltimore, Md.
21 March 1924

ANITA SLATER : IN THE CIRCUIT COURT
VS. : OF
WILLIAM B. SLATER : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents.

1. That she was married to her husband, William B. Slater, in the District of Columbia, on or about the 27th day of May, 1918 and with whom she resided until about the 3rd day of December, 1920 when the defendant deserted the plaintiff.
2. That though the conduct of your Oratrix toward the said William B. Slater has always been kind, affectionate and above reproach, he has, without any just cause or reason abandoned and deserted her and has declared his intentions to live with her no longer, and that such abandonment has continued uninterruptedly for more than three years and is deliberate and final and the separation of the parties is beyond any reasonable expectation of reconciliation.
3. That there are two children as issue of said marriage; Eva Marion, four years of age; Jamie Howard, three years of age, for whom the plaintiff asks the custody.
4. That your Oratrix has not lived or co-habited with the said defendant since said desertion.
5. That your Oratrix is a citizen of the State of Maryland, residing in Baltimore City for more than two years prior to the filing of this bill, but that the defendant is a non-resident of the State of Maryland and when last heard of was in Washington, D.C.

TO THE END, THEREFORE:

(a) That your Oratrix may be divorced a Vinculo Matrimonii from the said William B. Slater.

(b) That she may have the custody of her two children.

(c) That she may resume her maiden name "DYKES".

(d) That she may have such other and further relief as her case may require.

May it please your Honor to grant unto your Oratrix the Order of Publication directed against the said William B. Slater, a non-resident of the State of Maryland, aforesaid, commanding and requiring him 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.

J. Steward Davis

George W. Evans

SOLICITORS FOR COMPLAINANT.

J. STEWARD DAVIS & GEORGE W. EVANS, SOLICITORS

215 ST. PAUL PLACE

IN THE CIRCUIT COURT OF BALTIMORE CITY.

ANITA SLATER VS. WILLIAM B. SLATER

The object of this bill is to procure a divorce A Vinculo Matrimonii by the plaintiff from the defendant.

The bill recites that the parties were married in the District of Columbia on or about the 27th day of May, 1918 and lived together until about the 3rd day of December, 1920 when the defendant deserted the plaintiff. That there are two children as issue of said marriage, Eva Marion, age four years and Jamia Howard, age three years for whom the plaintiff asks the custody. That the defendant is a non-resident of the State of Maryland and when last heard of was in Washington, D.C. That though the conduct of your Oratrix toward the said defendant has always been kind, affectionate and above reproach, he has deserted her without any just cause or reason and has declared his intentions to live with her no longer; that said abandonment has continued uninterruptedly for more than three years and is deliberate and final and the separation of the parties is beyond any reasonable expectation of reconciliation. That the plaintiff has been a citizen of the State of Maryland for more than two years prior to the filing of this bill of complaint.

It is thereupon this 21st day of *March* 1924, ordered by the Circuit Court of Baltimore City, that the plaintiff by causing a copy of this order to be published in Baltimore City, once in each of four successive weeks, before the 22nd day of *April* 1924, give notice to the absent defendant, William B. Slater, of the object and substance of this bill, warning him to be and appear in this court in person or by Solicitor on or before the 9th day of *May* 1924 to show cause, if any he may have, why a decree should not be passed as prayed.

W. Steward Davis

195

1924

D64

Docket No.....

Anita Slater

vs.

Mrs Slater

Certificate of Publication

*A 26741
 (3)*

THE DAILY RECORD

Filed *9* day of *May* 192*4*

THE DAILY RECORD

J. Steward Davis & George W. Evans, Sols.,
215 St. Paul Place.

IN THE CIRCUIT COURT OF BALTI-
MORE CITY — (B-196-1924) — Anita
Slater vs. William B. Slater.

ORDER OF PUBLICATION.

The object of this bill is to procure a divorce a vinculo matrimonii by the plaintiff from the defendant.

The bill recites that the parties were married in the District of Columbia on or about the 27th day of May, 1918, and lived together until about the 3rd day of December, 1920, when the defendant deserted the plaintiff; that there are two children as issue of said marriage, Eva Marion, age four years, and Jamia Howard, age three years, for whom the plaintiff asks the custody; that the defendant is a non-resident of the State of Maryland, and when last heard of was in Washington, D. C.; that though the conduct of your oratrix toward the said defendant has always been kind, affectionate and above reproach, he has deserted her without any just cause or reason and has declared his intentions to live with her no longer; that said abandonment has continued uninterruptedly for more than three years and is deliberate and final and the separation of the parties is beyond any reasonable expectation of reconciliation; that the plaintiff has been a citizen of the State of Maryland for more than two years prior to the filing of this bill of complaint.

It is thereupon this 21st day of March, 1924, ordered by the Circuit Court of Baltimore City, that the plaintiff by causing a copy of this order to be published in Baltimore City, once in each of four successive weeks, before the 22nd day of April, 1924, give notice to the absent defendant, William B. Slater, of the object and substance of this bill, warning him to be and appear in this Court in person or by solicitor on or before the 9th day of May, 1924, to show cause, if any he may have, why a decree should not be passed as prayed.

CHARLES F. STEIN.

True Copy—Test:

CHAS. R. WHITEFORD,

Clerk.

Baltimore, APR 1 2 1924, 192

We hereby certify that the annexed advertisement of Order Publication Circuit Court

of Baltimore City, Case of

Anita Slater
vs. William B. Slater

was published in THE DAILY RECORD, a daily newspaper published in the City of Baltimore, once in each of

four successive weeks before the
22nd day of April, 1924

First insertion Mar. 22nd, 1924

THE DAILY RECORD

Per Alexander Kutz

67D

1924

Ct. Ct.

Docket B 26741

Slater

vs.

Slater

Decree Pro Confesso.

B 26741

No.

4

Filed

20 May 1924

Enita Slater

vs.

Wm B Slater

IN THE
Circuit Court

OF
BALTIMORE CITY.

March Term, 1924

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 ~~10th~~ *four* day of *May* in the year nineteen hundred and twenty *four* 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.

Charles F. Owen

6413 DOC. B 195
1924

IN THE CIRCUIT COURT

No. /

OF BALTIMORE CITY

Anita B. Slater

vs.

William B. Slater

{ 6 }

PLAINTIFF'S EXHIBIT

EXAMINER No. /

No. *267413*

FILED WITH THE EXAMINER

May 20, 1924

A. deR. SAPPINGTON
EXAMINER

fd. 1st October 1925

6413

Post Office Department

OFFICIAL BUSINESS

REGISTERED ARTICLE

No. 60570

INSURED PARCEL

No. _____

Return to _____

Street and Number,
or Post Office Box, _____

Slater

PE # 1

AN 5/22/24

Caris - Coates

(NAME OF SENDER)

215 St Paul 214164

PENALTY FOR PRIVATE USE
TO AVOID PAYMENT OF
POSTAGE, \$300.

POSTMARK OF DELIVERING
OFFICE

AND DATE OF DELIVERY

BALTIMORE,

MARYLAND.

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

W. B. Dudley
Lora B. Carter

(Signature or name of addressee.)

1841-99

(Signature of addressee's agent.)

Date of delivery, 3/25/24, 192

3/13/60

64B

Doc. B

195
1924

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Arita B. Slater

vs.

William B. Slater

No. 2,6741B

PLAINTIFF'S COSTS

Examiners..... \$ 8⁰⁰

Copies

Sheriff.....

Stenographer

{5} \$

DEFENDANT'S COSTS

Examiners..... \$

Copies

Sheriff.....

Stenographer

\$

pd. 1" October 1925

Anita B. Slater

vs.

William B. Slater

In the Circuit Court

OF BALTIMORE CITY.

Deere 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
Seventeenth day of *May* 19*24*, met on
 the *Twenty-First* day of *May* in the year nineteen
 hundred and *Twenty-Seven* at my office, in the City of Baltimore, in the State
 of Maryland, and assigned the *twenty-second* day of *May*
 in the same year at *one-thirty* o'clock in the *after-* noon and the
 office of *Adell Sappington, 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:—

B

ANITA SLATER

vs

WILLIAM B. SLATER,

Testimony taken at the office of A. de R. Sappington, Esq., 733-45 Title Building, Baltimore, Md. on Thursday, May 22nd, 1924 at 1:30 P.M.

ANITA SLATER, 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. Anita Slater, 411 Biddle St., Domestic.

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

A. I am the Plaintiff and the defendant is my husband.

BY MR. EVANS:

1 Q. Where, when and by whom were you married?

A. May 27th, 1918, Washington D. C. by the Rev.

Mr. Jarvis, a Baptist minister. I was married according to the baptist ceremony.

2 Q. After your marriage wheredid you live?

A. In Washington, for a year and then we came to Baltimore and I have lived here ever since.

Anita Glater.

3 Q. Then you have lived in Baltimore City, Maryland for more than two years prior to the filing of your bill in this case?

A. Yes.

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

A. No.

5 Q. Which left the other?

A. He left me December 3rd, 1920.

6 Q. What was your conduct towards your husband?

A. I was a kind, affectionate and faithful wife.

7 Q. Did you give him any just cause or reason to desert you?

A. No.

8 Q. What was his conduct towards you?

A. For the first year he was all right, then he got so that he would not support me and then he ran around with women and I spoke to him about it and he said he wasn't going to stop and then he left me.

9 Q. Since he left you in December, 1920, has he contributed towards your support?

A. For a little while, but he didnot keep it up.

10 Q. Has he offered to provide a home for you or asked you to come to live with him since he deserted you?

A. No.

Anita Slater.

11 Q. Are there any children of this marriage?

A. Two. Eva Marion Slater, 4 years old and
Jamia Howard Slater, 3 years old.

12 Q. Who has these children?

A. I have.

13 Q. Do you desire their custody awarded to you?

A. Yes.

14 Q. Are you able to support and maintain these
children?

A. Yes. I have done so since my husband left me.

15 Q. Is your husband a resident of the State of
Maryland?

A. No.

16 Q. Do you know where he is?

A. No. He is a native of Washington, D. C. He went
to Washington and his address was 1841 Ninth Street,
N.W.. My lawyer sent him a copy of the Order of Pub-
lication to that address by Registered Mail and the
receipt card was returned signed by some one for him.

NOTE: Receipt above referred to herewith produced
and filed with the Examiner marked "Plaintiff's Exhibit
Examiner No. 1."

17 Q. Has this abandonment and desertion of you by the
Plaintiff continued uninterruptedly for more than three
years prior to the filing of the Bill in this case?

Anita Slater.

A. Yes.

18 Q. In your opinion is the separation deliberate and final and beyond any hope of a reconciliation?

A. Yes.

19 Q. Since your husband left you in December, 1920, have you lived or cohabited with him?

A. No.

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.*

Ainta Slater

GWENDOLYN RICH, 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. Gwendolyn Rich, 411 Biddle Street. Housewife.
- 2 Q. Do you know the parties to this suit?
A. Yes. I have known them about five years. Since they came to Baltimore.

BY MR. EVANS:

- 1 Q. What relationship exists between them?
A. Husband and wife. They both told me they were married to each other. They lived together as husband and wife and their friends considered them married people.
- 2 Q. Are they living together now?
A. No.
- 3 Q. Which left the other?
A. The husband left.
- 4 Q. When?
A. In December, 1920.
- 5 Q. What was his wife's conduct towards him?
A. She was a devoted wife, did her duty and was kind and true to him.
- 6 Q. Did she give him any just cause or reason to desert her?
A. No.

Gwendolyn Rich.

7 Q. What was his conduct towards her?

A. He would not work and did not support the child. He ran around with other women and finally left her.

8 Q. Has the Plaintiff resided in Baltimore City, Maryland, for more than two years prior to the filing of her bill in this case?

A. Yes, about four years.

9 Q. Were any children born of this marriage?

A. Two, Eva Marion Slater about four and Jamia Howard Slater about three.

10 Q. Who has these children?

A. She has.

11 Q. Is she able to support and maintain them?

A. Yes. She has done so since her husband left her.

12 Q. Which parent is the proper one to have the custody of these children?

A. The Mother.

13 Q. Is the defendant a resident of Baltimore, City, Maryland?

A. No.

14 Q. Do you know where he is?

A. I have heard that he is in Washington. He came from there.

15 Q. Has this abandonment and desertion of the Plaintiff by the Defendant continued uninterruptedly for

GWENDOLYN RICH

more than three years prior to the filing of the bill in this case?

A. Yes.

16 Q. In your opinion is it deliberate and final and beyond any hope of a reconciliation?

A. Yes. I have talked with him about his wife and he said he was not coming back to her.

17 Q. Since they separated in December, 1920 has she lived or cohabited with her husband?

A. No. I know that because I have lived in the same house with her.

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.

Gwendolyn Rich

No other witnesses being named or produced before me, I then, at the request of the Solicitor.....of the plaintiff..... closed the depositions taken in said cause and now return them closed under my hand and seal, on this.....day of..... in the year of Our Lord nineteen hundred and twenty-four.....at the City of Baltimore, in the State of Maryland.

..... (SEAL).
Examiner.

There ~~are~~ ^{is} one..... Exhibits with these depositions, to wit:

Plaintiff's..... Exhibit Examiner No. 1......

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

.....
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 both..... of which I was employed by the Plaintiff....., and on now..... by the Defendant.....

.....
Examiner.