

IN THE CIRCUIT COURT

OF

BALTIMORE CITY

JOHN TALIAFERRO

VS.

ARDELLA TALIAFERRO

205 S Bethel St

BILL FOR DIVORCE

B 97735

Mr. Clerk:-

Please file.

(1)

Davis & Evans
ATTORNEYS FOR PLAINTIFF.

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

Oct 1924

JOHN TALIAFERRO

:

IN THE CIRCUIT COURT

VS.

:

OF

ARDELLA TALIAFERRO

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents;

1. That he was married to his wife, Ardella Taliaferro, on the 17th day of December, 1918 and with whom he resided until the 28th day of August, 1924.
2. That ever since said marriage, your Orator has behaved himself as a faithful, chaste and affectionate husband toward the said Ardella Taliaferro.
3. That the said Ardella Taliaferro 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 is one child, Edgar, age four years, born as issue of said marriage.
5. That both your Orator and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this bill.

TO THE END THEREFORE:

- (a) That your Orator may be divorced a Vinculo Matrimonii from the said Ardella Taliaferro.
- (b) That he may retain the custody of his son Edgar.
- (c) 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 Ardella Tallaferra,
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.



SOLICITORS FOR COMPLAINANT.

P393

706
192 4 B Docket No. 64 Ct. Ct.

Taliaferro

vs.

Taliaferro

205, S. Bethel St,

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. ^{pw} B-27735

(2)

Filed 14 October 192

Christ Evans SOLICITOR

*Summoned and a copy of the Process left with
the Defendant*

*(Budaey
10/21/27)*

Fee \$0.80

*John E. Potee
Sheriff*

EQUITY SUBPOENA

The State of Maryland

To

Ardella Taliaferro

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

John Taliaferro

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 8th day of sept 1924 Issued the 6th day of Oct, in the year 1924

Chas. P. Whitford 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)

706
1924

Ct. Ct.

Docket 6413

John Taliaferro
vs.

Ardella Taliaferro

Decree Pro Confesso.

B 27735
No.
(3)

Filed

5 Nov 1924

John Taliaferro
vs.
Addella Taliaferro

IN THE
Circuit Court
OF
BALTIMORE CITY.

Sept

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 *5th* day of *August* 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. Stein

Doc. 2 706
1924

3/13/46

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

John Saliaferro

vs.

Ardella Saliaferro

No. 27735 2

PLAINTIFF'S COSTS

Examiners.....	\$ 8.00
Copies.....	
Sheriff.....	
Stenographer.....	3.00
	\$ <u>11.00</u>

DEFENDANT'S COSTS

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

FD 3 Jan 1928.

John Saliaferro

vs.

Ardella Saliaferro

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
fifth day of *November* 19*24*, met on
 the *eleventh* day of *November* in the year nineteen
 hundred and *twenty-four* at my office, in the City of Baltimore, in the State
 of Maryland, and assigned the *twelfth* day of *November*
 in the same year at *one* o'clock in the *after-*noon and the
 office of *Adele 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:—

8-5'

Taliaferro,

v.

Taliaferro.

Testimony taken at the office of A. deR. Sap-
p ington, Esq., Baltimore, Maryland, November 12th.,
1924, at O'clock

John Taliaferro, the Plaintiff in this case,
produced on his 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. John Taliaferro, 1647 East Fayette Street; rail
straightner.

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

A. I am the Plaintiff and my wife is the Defendant.

By Mr.

1 Q. When were you married?

A. December 17th., 1918.

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?

A. Yes.

5 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. Yes.

John Taliaferro

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

A. One child.

7 Q. What is the name and the age of the child?

A. Edgar; four years old.

8 Q. Do you want the custody of this child?

A. Yes.

8 Q. Are you able and willing to support, educate and rear this child?

A. Yes.

9 Q. What was your conduct towards your wife while living together; how did you treat her?

A. I treated her the same as 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 the parties to this suit living together now?

A. No sir.

12 Q. Which left the other; did you leave her or did she leave you?

A. She left me.

13 Q. When?

A. August 28th.

John Taliaferro.

14 Q. What year?

A. This year 1924.

15 Q. You charge your wife with adultery; do you know anything personally about that

A. Yes; I know it of my own knowledge.

16 Q. Tell us what you know of your own personal knowledge?

A. I know that after she left me, that she went right to 205 South Bethel Street and lived with a man named John Smith as husband and wife; I went down there to see her, and I went into the house and I saw them both together; she and John Smith; I saw them in the bed room and I accused them of living together there as husband and wife and she acknowledged it to me, and she told me to go about my business.

17 Q. Then, that is all you know of her adulteries/ is it?

A. Yes.

18 Q. Now, have you lived or cohabited with her since August 28th., 1924?

A. No.

19 Q. Have you lived or cohabited with her since you discovered her adulteries?

A. No sir.

John Taliaferro.

20 Q. Have you lived or cohabited with her since she admitted her adulteries to you?

A. No sir.

21 Q. Have you forgiven or condoned her offense in any way?

A. No sir.

22 Q. Was she and John Smith the only people who occupied this house?

A. No sir; they only had a bed room there.

23 Q. And it was in this bed room that you saw them and confronted them, and they both of them acknowledged that they were living there as husband and wife?

A. Yes.

Lucy Taliaferro, 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. Lucy Taliaferro, 516 Glenwood Avenue; house work.
- 2 Q. Do you know the parties to this suit?
- A. Yes.

By Mr. Davis:

- 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; you know that?
- A. Yes.
- 5 Q. And is the name and the age of the child correctly given by the father.
- A. Yes.
- 6 Q. Do you think that he is the fit and proper party

Lucy Taliaferro.

to have the care and custody of this child?

A. Yes.

7 Q. What was his conduct towards his wife while living together; how did he treat her?

A. Very faithful and affectionately.

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

A. Yes.

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

A. No sir.

10 Q. Which left the other; did he leave her or did she leave him?

A. She left him.

11 Q. When?

A. About August 28th., 1924.

12 Q. He has charged his wife with adultery; do you know anything personally about that?

A. Yes.

13 Q. Tell us what you know.

A. Well, I know this much about it: I guess it was along in June 1924, that I went to see Mrs. Taliaferro on Madeira Street; at that time she was living there with this man Smith as husband and wife.

Lucy Taliaferro.

14 Q. Do you mean that Smith and this Defendant was living together at that time as husband and wife?

A. Yes.

15 Q. Was that during a separation between Mr. and Mrs. Taliaferro prior to this final separation?

A. Yes.

16 Q. How do you know that they were living at this house in June 1924 as husband and wife?

A. Because she told me herself; she told me that; she made her husband get out for this other man; she told me that; and I saw them living there as husband and wife.

17 Q. What was their conduct with one another in your presence; what did you see them do.

A. They acted as though they were husband and wife;; she acted towards him the same as if he was her husband.

18 Q. Now, then, her husband forgave her for that, did he?

A. Yes.

19 Q. And went back and lived with her until August 28th., 1924?

A. Yes.

20 Q. And then what happened?

Lucy Taliaferro.

A. Well, during that time she came to my house and visited me and she said to me,- she said in these words "You know, I am with John again, but I am not going to stay with him; I don't love him; I love Big John",- that is what she called this other fellow Smith "better than I do my husband, and I am really going to leave him", and I talked to her and I said "You know John has been a good man to you since he has been married to you, and I would not do that way; that is not right", and she said "I am not worried about it; you will see; I am not going to stay with him much longer",- So, that was, I think, one Sunday that she was out to the house and the next Friday I went out there and she had left her husband and gone; her sister told me that she had gone with this man.

21 Q. Have you seen her to talk to since that time.

A. No; I have not seen her since the last separation.

22 Q. And you do not know whether or not she went back to this John Smith or not, do you?

A. No sir; only from what she told me that she was going to leave her husband and go back to him, and I know that she did leave her husband but whether she went back to Smith I do not know.

Lucy Taliaferro.

23 Q. You do not know whether she went back to him or not.

A. No sir, I dont, but I do know that she told me that she was going to leave her husband and go back to John Smith, and when I visited her about a week afterwards about June 1924 or July, she had left, and I have not seen h  sine that time.

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
Lucy Taliaferro

John Taliaferro, the Plaintiff in this case, heretofore produced and sworn, recalled:

By Mr. Davus:

1 Q. You have heard the testimony of the previous witness as to an adultery of your wife which occurred sometime in June 1924; did you know of this adultery personally?

A. Yes; I absolutely did.

2 Q. And notwithstanding that you forgave her and went back to live with her.

A. Yes.

3 Q. Did you go back with her on her promise that she would be a good and faithful wife to you?

A. Yes.

4 Q. And instead of doing that she deserted you for this man again and went to live with him as husband and wife?

A. Yes.

5 Q. And you say that you went to the house where they were living in this bed room and confronted them in the bed room, and they both acknowledged to you that they were living there as husband and wife and they told you to get out?

A. Yes.

6 Q. How were they clothes when you went into this bed room

John Taliaferro.

A. They were in their night clothes.

7 Q. How was it that you were able to gain access to this room and find them there in that condition.

A. By another friend of mine.

8 Q. Explain that.

A. I went to this house in order to get in to see if she would give me my children, and so the man on the first floor directed me up the stairs where they were and O. goes up and I asked her for the children and that is what I saw.

9 Q. But somebody admitted you to this house, who was it?

A. John Jackson. He was a friend of mine and he opened the door, and I asked to see my wife and he told me to go right up to the room, which I did.

10 Q. What time of the day or night was it that you entered this bedroom?

A. About eight o'clock at night.

Were they in bed.

A. No; they were not in bed; they were getting ready for bed, and we had some words, and she told me to get out, which I did; they were getting ready for bed and I suppose they went to bed after I left.

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.

John Talispa

Marie Bullard, 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. Marie Bullard, 1647 East Fayette Street; house work.

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

A. Yes.

By Mr. Davis:

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; I have known him about six months.

3 Q. Has he lived in Baltimore, Maryland, since you have known him.

A. Yes.

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

A. No sir.

5 Q. Do you know when they separated and which left the other?

A. She left him about August 28th., 1924.

6 Q. Why did she leave him.

A. I do not know why, but she left him.

7 Q. Do you know anything about her adulteries?

Marie Bullard.

A. I only know what everybody knows that she went to live with this man Smith, but I dont know it of my own personal knowledge; it must be so, everybody says so, but I dont know it of my own knowledge.

8 Q. It is a generally known fact among their friends and acquaintanes.

A. Yes.

9 Q. Has he lived or cohabited with his wife or forgiven or condoned his offense since this time?

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
Marie Bullard

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

A. de Russy Sappington (SEAL).
Examiner.

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

Defendant's Exhibit

A. de Russy 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 Russy Sappington
Examiner.