

IN THE CIRCUIT COURT

OP

BALTIMORE CITY.

B 463
1917

GEORGE WILLIAMS

VS.

ELLA WILLIAMS

BILL FOR DIVORCE A VINC
ULO FIATROMONII.

Mr. Clerk please file.

(J. Steward Davis)

B 17047
(1)

J. STEWARD DAVIS

ATTORNEY AT LAW

COURTLAND BUILDING
215-217 COURTLAND ST.

BALTIMORE

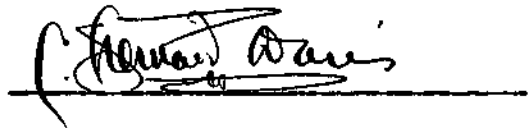
sd 17 Oct 1917

TO THE END THEREFORE:-

- a. That your Orator may be divorced a Vinculo Matrimonl from the said Ella Williams.
- b. That he may have such further relelf as his case may require.

May it_please your Honor to grant unto your Orator the Writ of Subpoena directed against the said Ella Williams 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.

A handwritten signature in black ink, appearing to read "C. Howard Davis", is written over a horizontal line.

Solicitors for the Complainant

11 JK

163 1007 Ct. Ct.

191 Docket No.

George Killhaus
vs

Ella Killhaus
or Jones

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pro

No. B
17047
<2>

Filed 29 Sept 1917

J Stewart Davis
SOLICITOR

SP 4488

9

Summoned and a copy of the process left with the defendant

Thomas H. McNulty
Sheriff

(Kelly)
on
Jan 10 1918

EQUITY SUBPOENA

The State of Maryland

To

Ila Williams

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 *Oct 1917*, to answer the complaint of

George Williams

against you in said Court exhibited.

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

WITNESS, the honorable MORRIS A. SOPER, CJ of Judge of the Supreme Bench of Baltimore City, the *10* day of *Oct* 191*7* issued the *17* day of *Oct* the year *1917*

Morris A. Soper Clerk.

Notice to the person summoned: *[Handwritten signature]*

"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."

3/12/1917

413
INF "rtfl CIRCUIT COURT
OF B 463
BALTIMORE CTTY.

(1917)

George Williams,
'rv--' vs. *i; . i*
Ella Williams.

ANSWER . . . ;
to
Bill of complaint.

Mr. clerk, ~~to~~ . . . ;

Please file, etc.

Robt. B. M. D.

Att. for Dg 2
23B courtland St.

B 170 47
(3)

pd 29 Sept 1917

George Williams,)
(
VS.)
(
Ella Williams.)
(

IN THE CIRCUIT COURT
OF
BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE 05] SAID COURT:

THE ANSWER, of your Respondent to the Bill of Complaint filed respectfully shows:

I. That she admits the allegations in the First, Fifth and Sixth paragraphs of said Bill.

II. She denies that the plaintiff was a faithful, chaste and affectionate husband towards his wife and to the contrary says that after said marriage Your Respondent, though ever demeaning herself as a chaste, affectionate wife, plaintiff's treatment of her was unKind and at times cruel and brutal and that she gave him no reason whatever for his harsh conduct.

III. She emphatically denies that she has been guilty of the crime of adultery since the seperation or at any other time.

IV. He denies the fourth paragraph in so far as it may be used against **her** in these proceedings but admits that she has not lived with her husband for pome time because of his aforementioned treatment toward her.

Having answered all the material allogations-, in due time Your Respondent prays the Court that the Bill be dismissed, and the plaintiff pay the costs.

And as in duty bound, she will ever pray



Attorney for Defendant

463 Circuit Court.

191

DOCKET NO.

57
George Williams

Ellis Williams

GENERAL REPLICATION.

MR. CLERK,

Please file

B

Solicitor for Plaintiff .

No.

17047
1 Oct 1917

FILED-191

George Williams

vs.

Ella Williams

IN THE
CIRCUIT COURT

OF
BALTIMORE CITY.

May Term, 19(7)

The Plaintiff joins issue on the matters alleged in answer of

Ella Williams, by her attorney Roy S. Bond

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

(Roy S. Bond)
Solicitor for Plaintiff .

CIRCUIT COURT

463
1917 6*7

Docket.....

George Williams
vs.

Ella Williams

Order

191

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

Case

3
No. *17047*

5

Fd. *first Oct* 191 **1**

George William

vs.

Ella William

IN THE
Circuit Court

--OF--

BALTIMORE CITY.

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

THE PETITION OF George William

in this case, respectfully shows that *~fcsi.* desire^{^0} to take testimony in this case, and respectfully prayo that leave be granted to do so before one of the Standing Examiners of this Court.

(Signature)
Solicitor for
George William

ORDERED, this X ⁵/₁₁ day of ¹¹/₁₅ 1917 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.

H. Arthur Stump

Docket.....3.....4.63/1917.....

IN THE CIRCUIT COURT.....

t..... George V/illiams

ra.

..... Ella Williams

DEPOSITIONS

10 No. *17047*
16

PLAINTIFFS COSTS

Examiner.....\$...8...QQ..

Copie*.....

Notice*.....

Sheriff.....^

Stenographer.....-+«V*.....

..... \$ Q no Paid.

DEFENDANT'S COSTS

Examiner.....\$.....

Copie*.....

Notices.....

Sheriff.....

Stenographer.....

..... \$

ALFRED J. CARR, Examiner

Filed *8* day of *Oct* 191*7*

George Willams	}	<i>mi</i> [^] In the (Etrnit (Homt
vs.		_____
EllaJZillams		OF BALTIMORE CITY

 The abaoe 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
 _____ **first** _____ day of _____ October _____ 1912 met on
 the: _____ **second** _____ day of _____ October _____ in the year nineteen
 hundred and _____ **spventopn** _____ at my office, in the City of Baltimore, in the State
 of Maryland, and assigned the _____ **f lfi** _____ day of _____ October _____
 in the same year at _____ **two** _____ 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;
r. t
 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 **B** _____ of the
 _____ respective parties _____ to take the following deposition, that
 is to say:—

GEORGE WILLIAMS, the plaintiff, produced as a witness on his 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- George Williams, 917 Jutland Avenue; waiter.

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

A- I am George Williams and Ella Williams is my wife.

BY MR. DAVIS:

3 Q- When, where and by whom were you married?

A- April 17th, 1912, by Reverend Aquilla, in Baltimore City.

4 Q- No children born of this marriage?

A- No-

5 Q- How long have you been a resident of the state of Maryland?

A- I was born here and lived here ever since.

6 Q- State what you know of Ella Williams and Daniel Jones?

A- She is living with him now.

7 Q- Where?

A- 1114 Argyle Avenue.

8 Q- Under what name is she living there?

A- By the name of Jones.

9 Q- Who is Daniel Jones?

A- That lady's husband, there (indicating).

10 Q- Have you ever known your wife to go to any house of questionable character with this man, Jones?

A- Yes, over to her sister's- May Feeley Hall.

George Williams.

11 Q- What kind of a house is that?

A- It is a crooked house, I know that* you can rent rooms there.

12 Q- Did you ever see your wife and Daniel Jones in there?

A- I have seen them both go in there.

13 Q- More times than one?

A- Two or three times.

14 Q- Have you ever known your wife to get into any kind of trouble?

A- She cut a woman down on a moon-light- (Hot) Elliott's wife. She was running with Bob Elliott and she took a knife and cut this woman, and was locked up in the Eastern Police station.

15 Q- What disposition was made of that case?

A- She sent for me and I didn't go, and Bob Elliott was there. She told me she cut this woman and I refused to do anything for her.

16 Q- Did you ever discuss with your wife this man Jones?

A- I asked her if she went with him and she told me it was none of my business.

17 Q- Where else have you ever seen them?

A- Excursions on Saturday and at the Regent Moving Pictures with Jones several times- Brown's grove and down Hotel "Gold-field two or three times.

18Q- Was she drinking?

A- Sure.

George Williams.

19 ^- now late would she stay?

A- As late as 3 o'clock in the morning.

20 Q- When she left, did she seem to be under the influence of liquor?

A_ Yes sir, and she was with this man Jones.

21 tj- Have you ever condoned the adultery of your wife?

A- Ho sir, I never botnered her since*

22 Q- What was your conduct since?

A- I don't go any place, I just stay in with my mother.

23 Q- You are asking for a divorce a vinculo matrimonii from your wife?

A- Yes sir/

Mr. Bond: ^ross .Examination Waived.

- - - - -

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 exaraination or the matters in question "between the parties? If so, state the same fully and at large in your answer.

Answer: /f/0_x
(

George Williams

GEORGIANA JONES, 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- Georgiana Jones, 1620 Miller St.; house-cleaning, office work*

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

A- I do; I have been knowing her nearly all of her life and Mr. Williams just since they have been married*

BY ME. DAVIS:

3 Q- State whether they are man and wife and if so, how you know it?

A- After they got married my husband told me. Then, I knew they lived together at their mother's home as man and wife and they also lived with her sister on Lewis street- there are several sisters of them- and their reputation in the community was that they were man and wife.

4 Q- Mrs. Jones, you are the wife of Daniel Jones, named as co-respondent in this bill?

A- I am •

5 Q- Could you state where Daniel Jones is living now?

A- His residence (both of them) last Wednesday, was 1114 Argyle avenue* I went there Wednesday morning.

6 Q- With whom is he living there?

A- Mr. Williams', wife- Julia Williams-

Georgiana Jones.

1 Q- I understand you to say you were there Wednesday morning?

A- I went there Wednesday morning*

8 Q- What did you see there?

A- His clothes in her Bureau drawer. I went there hunting up some things "belonged to me, but didn't find them. I found her living there with him- so the man stated who rents the house.

9 Q- Under what name?

A- Mr. and Mrs. Jones.

10 Q- Have you ever known your husband to go into a questionable house- Deter known as a house of assignation, with Jfrs.' .William's?

&- As far as I know, the woman lived at my house lived at this .Ella Williams' sister's house, and she said they used to come there all hours of the night and stay all night. Of course, myself, I haven't seen them. I knew myself he went there by different ones telling me •

11 Q- That is known as a questionable house?

A- Yes sir.

12 Q- Have you ever seen them together?

A- O, yes.

13 Q- Where?

A- On the cars and on the street and on excursions on Brown's boat- twilight excursions. I saw them together at this* house, 1114 Argyle avenue, sitting on the steps together-

Georgians Jones.

14 Q- That is the house they live together as man and wife in?

A- Yes sir.

15 Q- And it is very common to see them together on the street?

A- Yes, several people visit my house saw them and met them. Of course, I never went any place to look after them.

16 Q- And it was very common to see them on the boat?

A- Yes sir-

17 Q- They were always together on this boat?

R- Yes sir.

18 ti- You never questioned your husband" about it?

A- Ho sir. After I learned he was running with her, I didn't bother him at all.

19 U- How long have you known this?

A- Two years and five months.

20 Q- And you are sure he goes with her steadily?

A- Must have, he was in her company all the time. Now they are living together. At first he didn't use that address, he used his sister's home, and I found out personally myself and went there Wednesday myself; I went all through the bedroom, . . . found his clothes.

El Q- Who did you go with?

A - Two Constables- they told me they would be my witness they were living there as man and wife; they went in before that.

Georgians Jones.

22 Q- You served a writ of replevin on him, did you not?

A- Yes, in the People's Court,

23 Q- Have you filed a bill of divorce yet?

A- Ho, I intend to do.

24 Q- You expect to name Ella Williams as co-respondent?

A- I expect to- she is one of my worst enemies.

25 Q- Do you know of your own knowledge that Dariel Jones and Mrs. Williams have ever gone into the house of Ifeyfelia Hall?

A- Yes sir, many times.

26 Q- When did you see them go in?

A- Several times on a Sunday afternoon, and sometimes at night; through the week, Monday nights usually, sometimes Thursday nights.

27 Q- What time?

A- In the afternoon. They would meet about three o'clock and sometimes six o'clock, and I have been around the neighborhood as late as ten o'clock. They would go in together and sometimes, one would come in after the other.

28 Q- How long would they stay in that house?

A- Well, I have been there in the neighborhood as long as three hours and I know they were in there that long.

29 Q- When were these occasions?

A- In the year of 1915 and 1916.

30 Q- Were they prior to September, 1917?

A- Yes sir.

31 Q- What is the general reputation of the house kept by Kayfelia Hall?

A- She is supposed to keep a disreputable house- a bad house.

Er. Bond: Cross Examination waived.

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, Mrs. Georgiana James.*

CHARLES A. COLLIES, a witness produced on behalf of the plaintiff, being duly sworn, deposes and saith as follows- that is to say-

BY THE EXAMINER:

1 y- State your name, residence and occupation?

A- Charles A. Collins, 1010 U. Durham 'ot..; painter and musician*

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

A- I do .

BY MR. DAVIS:

3 Q- You say that you are a musician?

A- Yes sir.

4 tl- You mean you play in orchestras, play for dances.?

A- Yes sir.

5 v*- Save you ever played with an orchestra on the steamer starlight that runs to Brown's Grove?

A- Yes sir, all last summer.

6 Q- Do you know Daniel Jones?

A- Yes sir-

7 Q- And you know Mrs. Williams?

A- Yes sir*

8 U- Did you ever see Mr- Daniel Jones and Mrs. Williams together on the boat?

A- Several times.

9 Q- And they were always together?

A- Yes, he danced with her.

Charles A. Collins.

10 Q- Did you see them sitting together in different parts of the boat?

A- Yes sir.

11 Q- A'bout how many times?

A- Five times , at least.

12 Q- This slimmer?

A- Yes.

13 Q- Where else have you played?

A- At the Goldfield Hotel.

14 Q- Have you ever seen them in the G-oldfield Hotel?

A- I have not seen her with him, "but with another fellow-kobert Elliott.

15 Q- And she was drinking with him?

A- O, yes*

16 Q- Did she drink very much?

A- I guess she was pretty well filled ;hen she came out • about half-past three in the morning.

17 Q- About what time do 3^ou think she csme in?

ft- -It was one when I oame, we didn't go to work until one, and they were in there then.

18 Q- How often did you see her with Elliott?

A- About once every week for about four months.

19 Q- Always drinking?

A- Always drinking.

20 Q- Always stayed late?

A- Yes-

Charles A. Collins.

21 Q- Have you ever played anywhere else?

A- Regent Moving Picture Parlor, Pennsylvania Avenue, near Pitcher, I think •

22 Q- Have you ever seen her com there with anyone?

&- Yes, with Daniel Jones.

23 Q- How often was she with Daniel Jones- more than once?

A- O, yes, more than once; sometimes mattinee and then back the same night•

4Q-Came regularly about how many times'a week?

A- About twice a week.

25 Q- For how long a time?

A- About a month, following up a seriel.

26 Q- Always with Daniel Jones?

A- Yes sir.

27 Q- You don't know what name she goes urder now?

A- Ko.

28 Q- Don't krow where she lives?

A- Eo.

29 Q- Ever see her with Daniel Jones any place else?

A- On the street twice.

30 Q- Where?

A- Just walking on the street. I knew her sister when she lived on Chaple street.

31 Q- ^hat was the reputation of her sister's house?

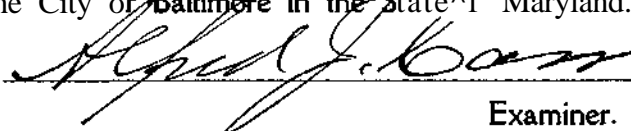

A- Where a man could stay with a woman that wasn't his wife.
Mr. Bond: Cross Examination Waived.

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.

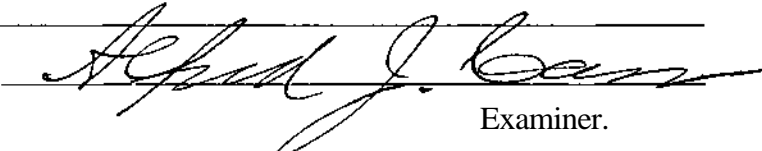
Answer: *Yes. Charles A. Collins*

No other witnesses being named or produced before me, I then, at the request of the solicitor a of the respective parties closed the depositions taken in said cause, and now return them closed under my hand and seal, on this 8th day of October in the year of Our Lord nineteen hundred seventeen at the City of Baltimore in the State of Maryland.

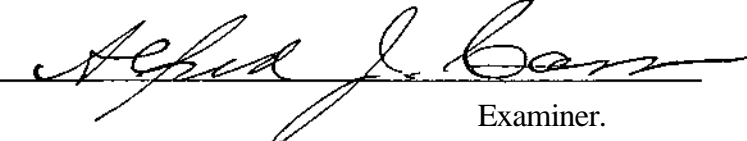

Examiner. 

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

Defendant's Exhibit


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


Examiner.

B
Ct. Ct. 57 463

Docket No.

rrn

George Williams

0

vs.

Ellis Williams

Submission for Decree

B

No. 17047

CPJ

Filed 10 Oct 1917

George Williams

vs.

Ella Williams

IN THE
CIRCUIT COURT

OF

BALTIMORE CITY.

September
~~*October*~~ Term

To the Honorable

U Arthur D. Turner

Judge of said Court:

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

(Edward) Davis

Delbert **H** *ong Williams*

W. L. Bond
Pl. for Defendant

463 237

1917

Docket No.

George Williams

vs.

Ella Williams

Order of Reference.

[Handwritten signature]

n+f'i
(8)

Filed 10 day of Oct 19 **01**

George Williams

vs.

Ella Williams

IN THE
CIRCUIT COURT

OF

BALTIMORE CITY.

September
~~_____~~ Term, 1917
11 day of *October* 1917
Esq.,

This case being submitted, without argument, it is ordeied by the Court, this
that the same be and is hereby referred to V^M-^f .(^/K*^X__^~^~
Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

W. Arthur Stump

Report of Auditor and Master.

Bill for divorce a vincuio matrimonii filed by the husband against his wife on the ground of V adultery. Code 1911, Art. 16, sees. 36-41.

Defendant summoned and answers by solicitor.

Plaintiff's residence in Baltimore City proven.

The marriage proven.

The adultery proven.

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

Case submitted and ready for decree*

Wm B. Cox

Aud-it-or-and-Master-;

Pee \$9 paid.

October 27th, 1917.

B 463
19.7

Williams
vs
Williams

B 170.47
(9)

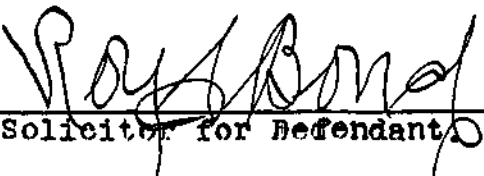
At 7 Nov 19.7

George Williams)
)
 VS. (
)
Ella Williams. (

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

Mr. Clerk:

 Please enter in the above entitled case,—, Appearance Fee,
paid. (To the extent of \$ 9.00).



Solicitor for Defendant

181

CIRCUIT COURT

B-463-

1917.

No. 57 Docket

GEORGE WILLIAMS

VS.

J & L LILLIS

Decree of Divorce

B No.

17 I 407

(10)

fd Shoreular 19V

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

Mand B. Coe

Auditor and I*aster.

GEORGE WILLIAMS

VS.

ELIA WILLIAMS

IN THE

Circuit Court

OF

BALTIMORE CITY

Term, 191 7.

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

It is thereupon, this *tf\$* .day of *y^M^y&PU* ^ A .D . 1917,
by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the
said . George Williams - - - - -
the above named Complainant be and he is hereby DIVORCED A VINCULO MATRI-
MONII from the Defendant, the said Ella Williams.

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

H. Arthur Stump