

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

B 413

CHARLES WILLIAMS

VS.

ANNIE M. WILLIAMS

B 28997

BILL FOR DIVORCE

(1)

Mr. Clerk: *(2)*

Please file.

Davis & Evans
ATTORNEYS FOR PLAINTIFF.

At 27 May 1925

DAVIS & EVANS

ATTORNEY AT LAW
215 SAINT PAUL PLACE
BALTIMORE, MD.

CHARLES WILLIAMS : IN THE CIRCUIT COURT
VS. : OF
ANNIE M. WILLIAMS : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

1. That he was married to his wife, Annie M. Williams on the 13th day of February, 1899 in Baltimore City, and with whom he resided until about the 16th day of April, 1905, when the defendant deserted the plaintiff.
2. That though the conduct of your Orator toward the said Annie M. Williams has been kind, affectionate and above reproach, she has, without any 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 the separation of the parties is beyond any reasonable expectation of reconciliation.
3. That your Orator has not lived or co-habited with the said defendant since said desertion.
4. That there are no children born as issue of said marriage.
5. That your Orator is a citizen of the State of Maryland residing in Baltimore City for more than three 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 Philadelphia, Pennsylvania.

TO THE END, THEREFORE:

(a) That your Orator may be divorced a Vinculo Matrimonii from the said Annie M. Williams.

(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 Order of Publication directed to the said Annie M. Williams, a non-resident of the State of Maryland aforesaid, 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.


SOLICITOR FOR COMPLAINANT

Original

Davis & Evans

DAVIS & EVANS, SOLICITORS

215 ST. PAUL PLACE

B 413
1925

IN THE CIRCUIT COURT OF BALTIMORE CITY.

CHARLES WILLIAMS VS. ANNIE M. WILLIAMS

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 on the 13th day of February, 1899 and lived together as man and wife until about the 16th day of April, 1905 when the defendant deserted the plaintiff.

That though the conduct of the plaintiff toward the said defendant has been kind, affectionate and above reproach, she has, without any just cause or reason abandoned and deserted him and has declared her intentions to live with him 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. That there are no children born as issue of said marriage. That the plaintiff is a citizen of the State of Maryland but that the defendant is a non-resident of the State of Maryland and when last heard of was in Philadelphia, Pennsylvania.

It is thereupon by the Circuit Court of Baltimore City, ordered this 27 day of May 1925, that the plaintiff by causing a copy of this order to be inserted in some daily newspaper, published in Baltimore City, once a week in four successive weeks, before the 30 day of June 1925, give notice to the absent defendant, Annie M. Williams, of the object and substance of this Bill, warning her to be and appear in this Court on the 16 day of July 1925, in person or by Solicitor to show cause, if any she may have, why a decree should not be passed as prayed.

True Copy Test

Clas R. [Signature]

George A. [Signature]

my 29-82 5, 12, 19

413
1925

Docket No.....

Williams

Williams vs.

Certificate of Publication

B28997
(3)

THE DAILY RECORD

Filed *3* day of *Aug* 1925

THE DAILY RECORD

Baltimore, JUN 19 1925, 192.....

Davis & Evans, Solicitors,
215 St. Paul Place.

IN THE CIRCUIT COURT OF BALTI-
MORE CITY — (B—413—1925) — Charles
Williams vs. Annie M. Williams
ORDER OF PUBLICATION.

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

The bill recites that the parties were
married on the 13th day of February, 1899,
and lived together as man and wife until
about the 16th day of April, 1905, when the
defendant deserted the plaintiff.

That though the conduct of the plaintiff
toward the said defendant has been kind,
affectionate and above reproach, she has,
without any just cause or reason aban-
doned and deserted him and has declared
her intentions to live with him no longer,
and that such abandonment has continued
uninterruptedly for more than three years
and is deliberate and final and the separa-
tion of the parties is beyond any reason-
able expectation of reconciliation. That
there are no children born as issue of said
marriage. That the plaintiff is a citizen of
the State of Maryland, but that the defend-
ant is a non-resident of the State of Mary-
land and when last heard of was in Phila-
delphia, Pennsylvania.

It is thereupon by the Circuit Court of
Baltimore City ordered this 27th day of
May, 1925, that the plaintiff by causing a
copy of this order to be inserted in some
daily newspaper, published in Baltimore
City once a week for four successive weeks
before the 30th day of June, 1925, give no-
tice to the absent defendant, Annie M. Wil-
liams, of the object and substance of this
bill, warning her to be and appear in this
Court on the 16th day of July, 1925, in per-
son or by solicitor to show cause, if any
she may have, why a decree should not be
passed as prayed.

GEORGE A. SOLTER.

True Copy—Test:

CHAS. R. WHITEFORD,
Clerk.

my29, je5, 12, 19

We hereby certify that the annexed advertise-

ment of Order Publication Circuit Court

of Baltimore City, Case of.....

Charles Williams

vs. Annie M. Williams

was published in THE DAILY RECORD, a daily news-

paper published in the City of Baltimore, once in each of

4 successive weeks before the

30th day of June, 1925

First insertion May 29th, 1925

THE DAILY RECORD

Per [Signature]

413
1925

Ct. Ct.

Docket 65

Charles Williams

vs.

Annie Williams

Decree Pro Confesso.

Satt

No.

B 28997
(4)

Filed

3 Aug

1925

Charles Williams
vs.
Anne Williams

IN THE
Circuit Court
OF
BALTIMORE CITY.

July

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 ^{3rd} day of August 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 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.

[Signature]

Doc. B $\frac{413}{1925}$

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Charles Williams

vs.

Annie M. Williams

No. 28997B

PLAINTIFF'S COSTS

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

DEFENDANT'S COSTS

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

Ed 9th Oct 1925.

3/12/2/38

Charles Williams

vs.

Annie M. Williams

In the Circuit Court

OF BALTIMORE CITY.

A decree Pro Confeser 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 viture of an order of the above named Circuit Court, passed in said cause on the third day of August 1925, met on the third day of August in the year nineteen hundred and twenty-five at my office, in the city of Baltimore, in the State of Maryland, and assigned the fourth day of August in the same year at eleven o'clock in the fore noon and the office of George Evans 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:—

8-45

CHARLES WILLIAMS

VS.

ANNIE M. WILLIAMS

Testimony taken before me, A. deRussy
Sappington, Examiner, at the offices of George Evans,
Esquire, Baltimore Maryland on August 4, 1925 at 11.00
o'clock in the forenoon.

Thereupon---

CHARLES WILLIAMS,

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

By the Examiner:

1Q Please state your name, residence and
occupation?

A Charles Williams, 924 Argyle Avenue, porter.

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

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

By Mr. Evans:

1Q When, where and by whom were you married?

A February 13, 1899 by a Minister of the Gospel, in Baltimore City.

2Q Did you live with your wife after the marriage?

A I did.

3Q Which left the other and when?

A I left her on April 16, 1905.

4Q Why did you leave her?

A Because she proved unfaithful to me.

5Q Tell us just what happened which caused you to leave?

A Instead of being home at night time, she was out and away from the baby all night, and I asked her not to go on the moonlights, and she went and stayed away two days. She wrote letters to this lady's (indicating) husband -- Mrs. Annie Williams husband.

7Q Is this Mrs. Annie Williams related to you?

A No, sir.

8Q Did you get after her about her conduct and about staying out?

A Yes;; not only myself but my Mother-in-law.

Charles Williams.

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9Q What did she say?

A She just paid no attention and she said she would do to suit herself. I asked her to stay home with the children and she said, I am going when I get ready. She was getting letters from Dorsey Williams.

10Q Were you always a kind, affectionate and faithful husband to your wife?

A Yes, sir, I was always.

11Q Did you give her any cause or reason to do and act as she did?

A No, sir, I always took care of her.

12Q Any children under age living as result of your marriage?

A No, sir, none living.

13Q Did you try to get your wife to do the right thing?

A Yes, sir.

14Q Were you willing to live with her if she would?

A Yes, at that time I was.

15Q At the time you left did you explain to her why you left?

A Yes, afterwards.

Charles Williams.

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16Q Did you offer to do the right thing if she would?

A Yes, sir.

17Q Has she made any demands on you for support or alimony?

A No, sir.

18Q Do you think there is any hope of reconciliation now?

A No, sir, I do not.

19Q Have you been a resident of the City of Baltimore, State of Maryland for more than two years prior to the time this case started?

A Yes, all my life.

20Q Have you lived or cohabited with your wife since the desertion in 1905?

A No, sir.

21Q Is your wife a resident of Maryland?

A No, sir.

22Q Where was she when last heard of?

A She was in Pennsylvania. That was four or five years ago.

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

Charles Williams

Thereupon---

ANNIE R. WILLIAMS,

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:

By the Examiner:

1Q Please state your name, residence and occupation?

A Annie R. Williams, 526 Orchard Street, laundress.

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

A Yes, sir.

By Mr Evans:

1Q Do you remember when Mr. and Mrs. Williams were married and lived together as husband and wife?

A Yes, I lived in their neighborhood at the time.

2Q Were they known and recognized in the community as husband and wife?

A Yes, sir.

3Q Which left the other?

A He left her.

4Q When?

A April 16, 1905.

5Q How did Mr. Williams treat his wife-- was he always a kind, affectionate and faithful husband to her?

A Yes, he was.

10Q Did he suport her?

A Yes, sir.

11Q What was her conduct towards him?

A She liked to run around, I know. She was always gone.

12Q Do you know why Mr. Williams left his wife?

A Because he couldnt stand her running with others. She went with my husband.

13Q What was your husband's name?

A Dorsey Williams.

14Q I believe Mr. Williams said some thing about a letter?

Annie R Williams.

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A Yes, several letters I got out of his pocket and gave Mr. Williams. They were from my husband to Annie Williams, Mr. Williams wife.

15Q Did you ever see any letters she wrote to your husband?

A Yes, sir, I did.

16Q I believe you found her at the place where he worked once or twice, didnt you?

A Yes, I seen her there three times.

17Q Did you tell Mr. Charles Williams about this?

A Yes, sir.

18Q Has Mr. Williams lived or cohabited with his wife Annie M. Williams since the desertion in 1905?

A No, sir, not since.

19Q Are there any living children as result of their marriage?

A No, sir.

20Q Is Mr. Williams a resident of the City of Baltimore, State of Maryland and has he been for more than two years prior to the time this case started?

A Yes, over thirty years. I have known him that

Annie R Williams.

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long.

21Q Is Mrs. Williams a resident of the City of Baltimore, State of Maryland?

A No, sir, not now.

22Q Where was she when last heard of?

A In Pennsylvania.

23Q Do you think there is any reasonable hope or expectation of reconciliation?

A No, sir.

24Q Did Mr. Williams give his wife any cause or reason to act as she did towards him?

A No, sir, none.

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.

Ann. R. Williams

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.....*9th* day of *October*..... in the year of Our Lord nineteen hundred and *twenty-five*..... at the City of Baltimore, in the State of Maryland.

C. de Russy Sappington (SEAL).
Examiner.

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

Defendant's..... Exhibit **.....

C. de Russy 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.....*both*..... of which I was employed by the Plaintiff....., and on.....*none*..... by the Defendant.....

C. de Russy Sappington
Examiner.

CIRCUIT COURT

B 413
1925 No. Docket

CHARLES WILLIAMS

VS.

ANNIE M. WILLIAMS

Recorded

Folio 293 1925

Decree of Divorce

B No. 28997
(7)

Ed. 26th October 1925.

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

William P. Lyons
Auditor and Master.

Charles Williams

vs.

Annie M Williams

IN THE
Circuit Court

OF
BALTIMORE CITY

September Term, 1925

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This case being submitted, without argument, it is ordered by the Court, this day of October, 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.

James P. Gorter

Report of Auditor and Master

Bill for divorce a vinculo matrimonii filed by the husband against his wife on the ground of abandonment. Code Art. 16, Sec. 37-42.

Defendant proceeded against as a non-resident and her non-residence proven.

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

The marriage proven.

Abandonment uninterruptedly for three years, its finality and the irreconcilability of the parties proven. See Hoffhines vs. Hoffhines, 146 Md. 353.

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

October 20, 1925

Circuit Court

413
19 25

Docket No. 1365

Charles Williams

vs.

Annie M. Williams

Order of Reference
and Report

Lyons

No. *B28997*
(6)

Order Filed *15* day of *Oct.* 19 *25*

Report Filed *24* day of *Oct.* 19 *25*

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

.....CHARLES WILLIAMS.....

VS.

.....ANNIE M. WILLIAMS.....

.....September.....Term, 1925..

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

It is thereupon, this 26" day of October - - - - - , A. D. 1925, by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said

..... CHARLES WILLIAMS, - - - - -

the above named Complainant be and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, ANNIE M. WILLIAMS.

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

James P. Gorter