

Interest Cert  
of

Baltimore City <sup>533</sup>  
1921

Wm Jackson

vs

Molly Jackson

Bill for Divorce of Wm & Molly

Wm Clerk please file

*[Signature]*

223032

(1) (2)

DAVIS & BISHOP  
ATTORNEYS AT LAW  
BANKER BUILDING  
14 E. FLEA MARKET STREET  
BALTIMORE, MD.  
*File 1/10/21*

WILLIAM JACKSON

IN THE CIRCUIT COURT

VS

OF

MOLLY JACKSON .

BALTIMORE CITY.

.....

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your orator complaining respectfully says:-

FIRST, That the parties hereto were married on or about December 30, 1903 by Rev. R.B.Hardy at Charlottesville Virginia and lived together as man and wife until on or about November 10, 1912.

SECOND, that your orator is a resident of the city of Baltimore, State of Maryland and have been for more than two years prior to the filing of this bill of complaint. That the respondent is a non-resident and when last heard of was in Charlottesville, Virginia.

THIRD, that though the conduct of your orator toward his wife has always been kind, affectionate and above reproach, she without any just cause or reason abandoned and deserted him and has declared her intentions to live with him no longer that such abandonment has continued uninterruptedly for more than three years prior to the filing of this bill of complaint and was deliberate and final, and beyond any reasonable hope or expectation of reconciliation.

FOURTH, That your orator has never condoned nor forgiven the said desertion, that he has never co-habited with the said respondent since the desertion.

FIFTH, That there are no children born as a result of said marriage.

a-a A DIVORCE A VINCULO MATRIMONNII FROM THE RESPONDENT.

b-b SUCH OTHER AND FURTHER RELIEF AS THE CASE MAY REQUIRE.

-3-

May it please Your Honor, to grant unto your orator, an order of publication, setting forth the nature and substance of this bill and warning the said defendant to be in this court in person or appear by solicitor on or before a certain day to be therein named and show cause, if any she may have why a decree should not be passed as prayed.

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J. STEVARD DAVIS, SOLICITOR,  
14 E. PLEASANT ST.

IN THE CIRCUIT COURT OF BALTIMORE CITY.

WILLIAM JACKSON VS. MOLLY JACKSON.

ORDER OF PUBLICATION:

The object of this suit is to procure a decree for a divorce A Vinculo Matrimonii, by the plaintiff from the defendant.

The Bill states that the parties thereto were married in Charlottesville Va. by Rev. Hardy, a minister of the gospel, on or about December 30, 1903; and lived together as man and wife until on or about November 10, 1912. That the plaintiff is a resident of the city of Baltimore, State of Maryland and has been for more than two years prior to the filing of this bill of complaint. That the defendant is a non-resident of this city and state, and when last heard of was in Charlottesville, Va. that though the conduct of the plaintiff towards his wife was always kind and affectionate and above reproach, she, without any just cause or reason abandoned and deserted him, and has declared her intentions to live with him no longer; That there are no children born as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City, ordered this <sup>17<sup>th</sup></sup> day of *October* 1921. That the plaintiff by causing a copy of this order to be inserted in some daily newspaper, published in the city of Baltimore, once a week for four successive weeks, before the <sup>17<sup>th</sup></sup> day of *November* 1921; and give notice to the said defendant, Molly Jackson (now absent) of the object and substance of this bill and warning her to be and appear in this court in person or by solicitor, on or before the <sup>3<sup>rd</sup></sup> day of *December* 1921: to show cause if any she may have, why a decree should not be passed as prayed.

*Charles H. Steiner*

433  
1921 B61

Docket No.....

Jackson

vs.  
Jackson

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Certificate of Publication

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B23032  
3

THE DAILY RECORD

Filed.....5.....day of Allen 1921

8571

# THE DAILY RECORD

Baltimore, NOV 9 - 1921, 192.....

J. Steward Davis, Solicitor,  
14 E. Pleasant St.

IN THE CIRCUIT COURT OF BALTIMORE CITY — (B—533—1921) — William Jackson vs. Molly Jackson.

### ORDER OF PUBLICATION.

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

The bill states that the parties thereto were married in Charlottesville, Va., by Rev. Hardy, a minister of the Gospel, on or about December 30, 1903, and lived together as man and wife until on or about November 10, 1912. That the plaintiff is a resident of the City of Baltimore, State of Maryland, and has been for more than two years prior to the filing of this bill of complaint. That the defendant is a non-resident of this City and State, and when last heard of was in Charlottesville, Va. That though the conduct of the plaintiff towards his wife was always kind and affectionate and above reproach, she, without any just cause or reason abandoned and deserted him, and has declared her intentions to live with him no longer. That there are no children born as a result of said marriage.

It is thereupon, by the Circuit Court of Baltimore City, ordered this 17th day of October, 1921, that the plaintiff, by causing a copy of this order to be inserted in some daily newspaper published in the City of Baltimore once a week for four successive weeks before the 17th day of November, 1921, give notice to the said defendant, Molly Jackson (now absent), of the object and substance of this bill, and warn her to be and appear in this Court, in person or by solicitor, on or before the 3rd day of December, 1921, to show cause, if any she may have, why a decree should not be passed as prayed.

CHAS. W. HEUISLER.

True copy—Test:

CHAS. R. WHITEFORD,  
Clerk.

oc18,25n1,8

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

..... of Baltimore City, Case of.....

*William Jackson*  
vs. *Molly Jackson*

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

*Four*..... successive weeks before the

*17th*..... day of *November*....., 192*1*.

First insertion *October 18th*....., 192*1*.

THE DAILY RECORD

Per. *Madison W. Crasster*

533 B.61 Ct. Ct.  
1912 Docket

Wm Jackson

vs.

Mollie Jackson

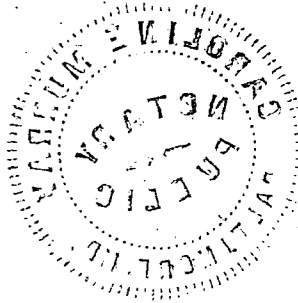
Decree Pro Confesso.

B23032

No.

Supp 4

Filed 5 Dec 1912



William Jackson  
vs.

Maeie Jackson

IN THE  
**Circuit Court**  
OF  
BALTIMORE CITY.

Term, 191

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 5 day of December in the year nineteen hundred and Twenty one 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 said 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.

Walter H. Hines

STATE OF MARYLAND,  
BALTIMORE CITY, SCT :

I hereby certify that on this 5<sup>th</sup> day of December 1921 before me, the subscriber, a Notary Public, of the State of Maryland, in and for the City aforesaid, personally appeared William Jackson and made oath in due form of law that her (his) husband (wife) the defendant in the above entitled case is not in the Military or Naval service of the United States Government, to the best of her (his) knowledge, information and belief.

As Witness my hand and Notarial Seal.

Caroline Murray  
Notary Public.

William Jackson C K S O W

Sign here  
X





Doc. 73 533  
1921

3/12/14/50

In the Circuit Court,  
OF BALTIMORE CITY

DEPOSITIONS

William Jackson

vs.

Mollie Jackson

No. 23032 B.

PLAINTIFF'S COSTS

Examiners.....\$ 8<sup>00</sup>  
Copies.....  
Sheriff.....  
Stenographer.....2<sup>00</sup>  
\$ 10<sup>00</sup>

DEFENDANT'S COSTS

Examiners.....\$  
Copies.....57  
Sheriff.....  
Stenographer.....  
\$

Feb. 3<sup>rd</sup> February, 1922

William Jackson

vs.

Mollie Jackson

In the Circuit Court  
OF BALTIMORE CITY.

Secree 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 December 1921, met on  
the fifth day of December in the year nineteen  
hundred and twenty-one at my office, in the City of Baltimore, in the State  
of Maryland, and assigned the sixth day of December  
in the same year at four o'clock in the afternoon and the  
office of Messrs. Davis & Bishop, 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:—

8-2

Jackson,

v.

Jackson.

Testimony taken at the office of Messrs Bishop and Davis, Pleasant Street, Baltimore, Maryland, December 6th., 1921' at 4 o'clock P. M.

WILLIAM JACKSON, a witness of lawful age, produced on behalf of the Plaintiff, having been first duly sworn, deposeseth and saith a fo@lows, that is to say:

BY THE EXAMINER:

1 Q. State your name residence and occupation?

A. William Jackson, Roland Avenue, Roland Park; chauffeur.

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

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

BY MR. DAVIS:

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

A. I was married by the Reverend Mr. Hardy in Charlottesville, Virginia.

2 Q. Of what Church?

A. The Zion Church.

3 Q. When?

A. December 30th. , 1903.

4 Q. Was the Reverend Mr. Hady a Minister of the Gospel;

a regularly Ordained inister of the Gospel.

William Jackson.

A. Yes.

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

A. No sir.

6 Q. I mean you and your wife?

A. No; we are not.

7 Q. Which left the other?

A. She left me.

8 Q. About what month and what year did your wife leave you?

A. That was November 10th., 1912.

9 Q. At any time since November 10th., 1912, have you and your husband either lived or cohabited together as husband and wife?

A. No sir.

10 Q. Was there any just cause or reason or excuse for your wife to abandon and desert you?

A. No sir.

11 Q. Did you do your full duty as a good and faithful husband should have done towards your wife?

A. Yes.

12 Q. Did you provide for your wife a good and comfortable home, and provide the necessaries of life as best your circumstances would permit?

A. Yes.

William Jackson.

13 Q. At the time you filed this Bill where did your wife live?

A. I heard that she was in Philadelphia,- the last thing that I heard of him.

14 Q. That was before you filed your Bill for divorce.

A. Yes.

15 Q. How long have you lived in Baltimore City, State of Maryland?

A. I have been here going on twenty years.

16 Q. Is there any hope of a reconciliation between you and your wife?

A. No sir.

17 Q. Why do you say that there is no hope of a reconciliation between you and your wife?

A. Because I do not know where she is; I have not seen her for nine years.

18 Q. And for that reason you say that there is no hope of a reconciliation?

A. No sir; there is not.

19 Q. Has the abandonment of you by your wife been deliberate and continuous and uninterrupted for a period of three years prior to the filing of this Bill?

A. Yes.

William Jackson.

20 Q. Has it been ever since November 10th., 1912?

A. Yes; ever since she left me.

21 Q. Since November 10th., 1912, have you and your wife lived or cohabited together?

A. No sir.

22 Q. Were there any children born as the result of this marriage?

A. No sir.

23 Q. Is your wife a resident or a non-resident of the State of Maryland; does she live in Maryland or out of Maryland?

A. She lives out of Maryland.

24 Q. Of what State is she a resident, as far as you know?

A. Charlottesville, Virginia; when she left me she told me that she was going to Charlottesville, Virginia.

25 Q. Just what happened at the time of the separation?

A. Well, she told me that she was going home; we were all happy as could be, and she left, and from that day when she said that she was going home, I never heard from her; that was over nine years ago.

26 Q. Have you attempted to locate her since that time?

A. Yes, but I never could get any answer from her, and I heard from people that she was in Philadelphia.

William Jackson.

27 Q. Those people told you that they saw her in Philadelphia?

A. Yes.

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*

*Walter Jackson*



FLOSSIE REYNOLDS, 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. Flossie Reynolds, 932 North Bond Street; housework.

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

A. Yes.

BY MR. DAVIS:

1 Q. Were you present at the marriage?

A. No sir.

2 Q. Do you know that they lived together as a husband and wife and were they known in society and among their friends as husband and wife?

A. Yes.

3 Q. Are they living together now?

A. No.

4 Q. Which left the other?

A. She left him.

5 Q. State how you know that.

A. We were in company together on that evening and she went away, and we were friends; we all were friends, and she said that she was going home, and I asked her, - she asked him to go to the car with her,

Flossie Reynolds .

and she said goodbye to me and said that she was going home.

6 Q. When was that?

A. November 10th., 1912.

7th Q. Now, since November 10th., 1912, have they either lived or cohabited together as husband and wife?

A. No.

8 Q. State how you know that.

A. Well, he did not know where she was.

9 Q. And he has been in Baltimore ever since.

A. Yes.

10 Q. And you have seen him frequently.

A. Yes.

11 Q. And she has not been here?

A. No sir.

12 Q. And for that reason you say that he has not lived or cohabited with her since November 1912?

A. No; he has not lived with her.

13 Q. When they lived together did you visit them frequently?

A. Yes.

14 Q. Did you observe their conduct each towards the other?

A. yes.

Flossie Reynolds.

15 Q. Did the Plaintiff provide a good and comfortable home, and the necessities of life as best his circumstances would permit?

A. Yes.

16 Q. And from your observation of his conduct towards his wife and her conduct towards him, would you say that there was no just cause or reason or excuse for his wife to leave him the way that she did.

A. No sir. There was not.

17 Q. How long to your knowledge has the Plaintiff lived in Baltimore City, State of Maryland?

A. About thirty years.

18 Q. Does the Defendant live in the state of Maryland?

A. No.

19 Q. Did she live in the state of Maryland at the time he filed his Bill of divorce?

A. No sir.

20 Q. That was about the middle of October 1921.

A. No; he has not.

21 Q. Os what State is she a resident?

A. She told me that she was going to Virginia.

21 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.

Flossie Reynolds.

22 Q. There are no children of this marriage?

A. No.

23 Q. Has the abandonment been continuous, deliberate and uninterrupted and final, for the last three years prior to the filing of this suit on the 18th., day of October 1921?

A. O, yes; yes indeed.

24 Q. They have been separated ever since November 10th., 1912?

A. Yes.

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*  
*Flossie Reynolds*

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 3<sup>rd</sup> day of February in the year of Our Lord nineteen hundred and twenty - one 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 both of which I was employed by the Plaintiff \_\_\_\_\_, and on none by the Defendant \_\_\_\_\_.

A. de Russey Sappington  
Examiner.

Circuit Court

233

1921

Docket No. ....

Jackson

vs.

Jackson

Order of Reference  
and Report

Robert

No. 23032

167



Order Filed 7<sup>th</sup> day of Febr 1922

Report Filed ..... day of ..... 19

William Jackson

vs.

Mollie Jackson

IN THE  
Circuit Court

OF  
BALTIMORE CITY

January Term, 1922  
7'

This case being submitted, without argument, it is ordered by the Court, this  
day of February, 1922, that the same be and it is hereby referred to  
Alexander H. Robertson, Esq., Auditor and Master, to report the  
pleadings and the facts, and his opinion thereon.

Carroll J. Bond

Report of Auditor and Master

Bill filed by husband against wife for divorce A Vinculo  
Matrimonii for abandonment for three years. Code Article 16, Section 36.  
Order of publication against defendant as non-resident, no  
answer, decree Pro Confesso, thirty days elapsed. Proof shows marri-  
age, residence of plaintiff, non-residence of defendant and abandon-  
ment for, at least, three years continuous, deliberate, final and  
without hope of reconciliation. Case ready for decree.

Alex H. Robertson

Auditor & Master.



# CIRCUIT COURT

B 533  
1921 No. Docket

William Jackson

VS.

Mollie Jackson

Recorded

folio 33 1922

## Decree of Divorce

B 23032

B No. 17

Ad 14 February 1922

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

Alex. Robertson  
Auditor and Master.

Decree of Divorce

IN THE

**Circuit Court**

OF

BALTIMORE CITY

William Jackson

VS.

Mollie Jackson

January Term, 1922.

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

It is thereupon, this <sup>14<sup>th</sup></sup> day of February, A. D. 1922.

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said

William Jackson

the above named Complainant be and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, Mollie Jackson.

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

*Carroll J. Bond*