

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

B 258
1926

ALMA WRIGHT

VS.

HARRY WRIGHT.

412 N Eden St

BILL FOR DIVORCE.

B 30760

Mr. Clerk:-

11

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS,

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

Ad 9th June 1926

ALMA WRIGHT : IN THE CIRCUIT COURT
VS. : OF
HARRY WRIGHT : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, Harry Wright on the 15th day of November, 1920 in Richmond, Virginia and with whom she resided until on or about the 15th day of January, 1921 when the defendant deserted the plaintiff.
2. That though the conduct of your Oratrix toward the said Harry Wright 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 your Oratrix has not lived or co-habited with said defendant since said desertion.
4. That there are no children born as issue of said marriage.
5. That both your Oratrix 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 of Complaint.

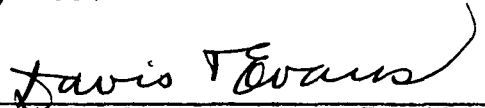
TO THE END, THEREFORE:

- (a) That your Oratrix may be divorced A Vinculo Matrimonii

- (b) That she may resume her maiden name "ANDERSON".
- (c) 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 Writ of Subpoena directed against the said Harry Wright, 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.



ATTORNEYS FOR PLAINTIFF.

P 588

Ct. Ct.

B 258
192 6 Docket No.

Alma Wright

vs.

Harry Wright

not at this address

412 1/2 Ecker St

SUBPOENA TO ANSWER BILL OF COMPLAINT

PW

No. B 30760

(2) *(3)*

Filed *14 June*, 192*6*
fd. 12th July 1926.
Evis & Evans SOLICITOR

13

*non est
Buch*

*non est
Buch*

*John & Peter
Sheriff*

June 14 1926

REISSUED TO *July* Return Day 1926
Richard Whiteford

Clerk

*John & Peter
Sheriff*

EQUITY SUBPOENA

The State of Maryland

To Harry Wright

412 N. Eden St.

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

Alma Wright

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 10 day of May 1926 Issued the 10 day of June, in the year 1926

Charles R. Whiteford 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.

Ct. Ct.

192

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed....., 192....

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

To Harry Wright

412 N. Eden St.

(copy)

REISSUED TO July ^{June 14} 1926
Return Day, 1926
Charles Whiteford
Clerk

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WITNESS, the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the **10** day of **May** 192**6**
Issued the **10** day of **June**, in the year 192**6**

Charles Whiteford Clerk

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IN THE CIRCUIT COURT OF

BALTIMORE CITY.

258
1926

ALMA WRIGHT

VS.

HARRY WRIGHT
—

ORDER OF PUBLICATION

Mr. Clerk:-

Please file.

Davis Evans
ATTORNEYS FOR PLAINTIFF

B 30,760
(4)

DAVIS & EVANS
ATTORNEYS AT LAW

FD 19 July 1926

DAVIS & EVANS, SOLICITORS
215 ST. PAUL PLACE
IN THE CIRCUIT COURT OF BALTIMORE CITY
ALMA WRIGHT VS. HARRY WRIGHT
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 15th day of November, 1920 and lived together until the 15th day of January, 1921 when the defendant deserted the plaintiff. That both parties are residents of Baltimore City but that two summons sent to the defendant's last known residence have been returned non est by the Sheriff of Baltimore City.

That though the plaintiff was kind and affectionate the defendant deserted her without any just cause or reason and declared his intentions to live with her no longer and that the separation has continued uninterruptedly for more than three years, is deliberate and final and beyond reconciliation. That there are no children born as result of said marriage.

It is thereupon ordered by the Circuit Court of Baltimore City this 19 day of *July* 1926, 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 19 day of *August* 1926, give notice to the absent defendant 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 4th day of *September* 1926, to show cause, if any he may have why a decree should not be passed as prayed.

Wm. C. Evans

192....

Docket No. ²³⁸

1926.

Alma Wright

vs.

Harry Wright

Certificate of Publication

B 30760
(57)

THE DAILY RECORD

Filed 9 day of Nov 1927

THE DAILY RECORD

Baltimore, **AUG 10 1926**, 192...

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

IN THE CIRCUIT COURT OF BALTI-
MORE CITY — (B — 258 — 1926) — Alma
Wright vs. Harry Wright.

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 15th day of November,
1920, and lived together until the 15th day
of January, 1921, when the defendant de-
serted the plaintiff. That both parties are
residents of Baltimore City but that two
summons sent to the defendant's last
known residence have been returned non-
est by the sheriff of Baltimore City.

That though the plaintiff was kind and
affectionate the defendant deserted her
without any just cause or reason and de-
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give notice to the absent defendant of the
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him to be and appear in this Court in per-
son or by solicitor on or before the 4th
day of September, 1926, to show cause, if
any he may have, why a decree should
not be passed as prayed.

EUGENE O'DUNNE.

True Copy—Test:

CHAS. R. WHITEFORD,
Clerk.

fy20,27,au3,10

We hereby certify that the annexed advertise-
ment of Order *Publication* Circuit Court

of Baltimore City, Case of

Alma Wright
vs. *Harry Wright*

was published in THE DAILY RECORD, a daily news-

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

Four successive weeks before the

19th day of *August* 1926

First insertion *July 20th* 1926

THE DAILY RECORD

Per *Thentzel*

B258

Ct. Ct.

1926

Docket

Alma Wright

vs.

Harry Wright

Decree Pro Confesso

Sapa

B No. 30760
(6)

Filed

10 July

1928

B25⁵⁸

Ct. Ct.

1926

Docket

Alma Wright

vs.

Harry Wright

Decree Pro Confesso

Qapp.

B No. 30760
77

Filed 16 July 1928

Alma Wright

vs.

Harry Wright

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

July

Term. 1928

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 ^{16th} day of ^{July} in the year nineteen hundred and twenty ^{eight} 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.

That the testimony taken July 16, 1928, be considered -
and as taken as of this date.

H. Arthur Stump

Circuit Court

B258

1926

Docket No. _____

Alma Knight

vs.

Harry Knight

**Order of Reference
and Report**

Coz

B No. 30760
97

Order Filed 20 day of July 1928

Report Filed 7 day of Sept 1928

Alma Wright

vs.

Harry Wright

IN THE
Circuit Court
OF
BALTIMORE CITY

July Term, 1928
20th

This case being submitted, without argument, it is ordered by the Court, this..... day of *July*, 1928, that the same be and it is hereby referred to *Ward B. Coe*, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

H. Arthur Plump

Report of Auditor and Master

Bill for divorce a vinculo matrimonii and for the resumption of her maiden name filed by the wife against her husband on the ground of abandonment. Code Art. 16, secs. 37-42.

Defendant proceeded against by publication after two successive returns of 'non est'.

Plaintiff's residence in Baltimore City for more than two years proven. Proof also shows defendant's last known residence to have been in Baltimore City.

The marriage proven.

The abandonment for three years, its finality and the irreconcilability of the parties proven.

A decree pro confesso was passed against the defendant and more than thirty days have since elapsed.

Case ready for decree.
Ward B. Coe

Auditor and Master
August 16, 1928

CIRCUIT COURT

B 258
1926 No. Docket

ALMA WRIGHT

VS.

HARRY WRIGHT
Recorded

Folio 310 1928

Decree of Divorce

B No. 30760
2107

Ed 18 Dec 1928

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

Ward B. Cox
Auditor and Master.

Circuit Court

OF

BALTIMORE CITY

ALMA WRIGHT

VS.

HARRY WRIGHT

JULY Term, 1928

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

It is thereupon, this 18th day of December, A. D. 1928

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

ALMA WRIGHT,

the above named Complainant be and she is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, the said HARRY WRIGHT;

AND IT IS FURTHER ORDERED that the complainant be and she is hereby authorized to resume her maiden name, Alma Anderson.

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

Eugene O'Dunn

Doc. 66 B ²⁵⁸/₁₉₂₆

3/13/3

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Alma Wright
vs.
Harry Wright

No. 30760 B

PLAINTIFF'S COSTS

Examiners \$
Copies
Sheriff
Stenographer
\$

DEFENDANT'S COSTS

Examiners \$
Copies
Sheriff
Stenographer
\$

Ad 19 July 1928

.....
Alma Wright
.....
vs.
Harry Wright
.....
.....

In the Circuit Court.....
OF BALTIMORE CITY.

A Decree Pro Confesso having been passed in the above 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
sixteenth (nunc pro tunc) day of **July** 19**28**, met on
the **sixteenth** day of **July** in the year nineteen
hundred and **twenty-six** at my office, in the city of Baltimore, in the State
of Maryland, and assigned the **sixteenth** day of **July**
in the same year at **three** o'clock in the **after-noon** and the
office of **A. deRussy Sappington, Esquire** 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—

8-4.
Alma Wright

Alma Wright

vs.

Harry Wright

Testimony taken before me A de R. Sappington, Examiner,
at my office, Title Building, Baltimore, Maryland, July
16th, 1926, at three o'clock.

Present: -- Mr. Davis:

Thereupon---

Alma Wright

the Complainant, a witness of lawful age, produced on her own
behalf, 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- Alma Wright, Franklin Street, 1621, I works at Univ-
ersity Clothing Company- sew.

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

A- I am the plaintiff.

By Mr. Davis:-

3 Q- And Harry Wright your husband is the defendant in this
case ?

A- Yes, sir.

Alma Wright.

4 Q- When were you married ?

A- I have to study.

5 Q- Fifteenth of November, 1920 ?

A- Yes, sir.

6 Q- And where were you married ?

A- Richmond, Virginia.

7 Q- By whom, a minister of the gospel or magistrate ?

A- Minister of the Gospel.

8 Q- You lived with your husband how long - you have here the fifteenth of January, 1921, is that right ?

A- Yes, sir.

9 Q- And whom left the other, did you leave him or did he leave you ?

A- He left me.

10 Q- He left you- what was your conduct towards your husband when you lived with him, were you kind- affectionate ?

A- Yes, sir, I was.

11 Q- Did you give him any cause or reason to leave you ?

A- No, sir.

12 Q- How did he treat you ?

A- He treated me every way but right.

13 Q- For instance, what did he do ?

A- He didn't half support me and he would go out and get drunk and he would stay out two or three nights at the time.

14 Q- Did he ever strike you or anything ?

A- Yes, sir.

Alma Wright.

15 Q- Often ?

A- Yes, sir.

16 Q- What happened on the day that he left ?

A- Before he left, we had a quarrel and he just went out and did not come back any more.

17 Q- Were you responsible for the quarrel ?

A- No, sir.

18 Q- What was the cause of the quarrel ?

A- He come home after something to eat and there was nothing there to eat.

19 Q- You mean, he hadn't left any money ?

A- He hadn't left any.

20 Q- Were you forced to support yourself and work ?

A- Yes, sir.

21 Q- During the time that you lived with your husband ?

A- Yes, sir.

22 Q- This abandonment of you has continued uninterruptedly ever since the fifteenth of January, 1921, is that right.

A- Yes, sir.

23 Q- You have never lived with him or cohabited with him since he left ?

A- No, sir.

24 Q- Are there any children born as the result of this marriage ?

A- No, sir.

25 Q- Is there any hope or expectation of you going back together again ?

Alma Wright.

A- No, sir.

26 Q- Are you a resident of the City of Baltimore and have you been for more than two years prior to the filing of your bill ?

A- Yes, sir.

27 Q- Was this desertion of you by him his own deliberate and final act ?

A- Yes, sir.

28 Q- The desertion occurred in Richmond, Virginia, didn't it ?

A- Yes, sir.

- - - - -

August 3, 1928, the plaintiff, Alma Wright, was recalled on this day before the Auditor and Master, and after first being duly sworn, testified as follows;

BY MR. DAVIS:

1 Q - You last testified in July, 1926; have you lived or cohabited with your husband since that time?

A - No, I have never seen him since.

2 Q - Was Baltimore City the last place of residence of your husband known to you.

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*

*my
Abma Wright*

Thereupon-----

Catherine Smith,

a witness of lawful age, produced on behalf of the complainant 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- Catherine Smith, 1543 Division Street, maid.

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

A- Yes, sir, I know them.

3 Q- Are you related to either one of them ?

A- Well, her and I was raised together.

4 Q- And how long have you known him ?

A- Oh, I have been knowing him ever since she got married.

By Mr. Davis:

5 Q- You were not present at the wedding I don't suppose ?

A- No, sir, I was not at the wedding.

6 Q- But did they live together as man and wife, didn't they ?

A- Yes, sir.

7 Q- And their reputation in Richmond, Virginia, where they lived was that of man and wife ?

A- Yes, sir.

Catherine Smith.

8 Q- And it has been stated by Mrs. Wright that they lived together from the day of their marriage, fifteenth of November, 1920, until the fifteenth of January, 1921, is that correct ?

A- Yes, sir.

9 Q- There was a separation, do you know which one left the other ?

A- He left her.

10 Q- He left her ?

A- Yes, sir.

11 Q- What was Mrs. Wright's conduct towards her husband ?

A- She did a wife's duty towards him.

12 Q- Was her conduct kind, affectionate and above reproach ?

A- Yes, sir, she was kind.

13 Q- True to him and faithful to him ?

A- Yes, sir.

14 Q- Did she give him any cause or reason to leave her ?

A- None.

15 Q- What- how did he treat her ?

A- He treated her cruel, he would go off and get drunk and would not leave her any money to get something to eat.

16 Q- Did he support her properly ?

A- No, sir, he didn't support her.

17 Q- Do you know anything about his beating her, would he beat her ?

A- Oh, yes, he would hit her.

Catherine Smith.

18 Q- More than once ?

A- Yes, sir.

19 Q- Now, was she forced to support herself- did she work ?

A- Yes, sir, she had to work to support herself.

20 Q- Now, has this separation continued uninterruptedly from the fifteenth of January, 1921, up to the filing of this bill- I mean have they been back together since the separation ?

A- Oh, no, sir.

21 Q- She has not lived or cohabited with him ?

A- No.

22 Q- Was the separation his own deliberate and final act ?

A- Do you mean that he left her his own self ?

23 Q- Yes-

A- Yes, sir.

24 Q- Is there any chance of them making up again ?

A- No, sir.

25 Q- Were there any children born the result of this marriage ?

A- No, sir.

26 Q- Mrs. Wright is a resident of the City of Baltimore and State of Maryland and has been for more than two years prior to the filing of this bill of complaint ?

A- Yes, -sir.

27 Q- And he is a resident ?

A- Yes, sir.

Catherine Smith.

28 Q- Was his desertion and abandonment of her his own deliberate and final act, I mean by that- did he leave her of his own free will ?

A- He left of his own free will because she never gave him any reason to leave 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,

Cathie Smith

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 **eighteenth**.....day of **July**..... in the year of Our Lord nineteen hundred and **twenty-eight**.....at the City of Baltimore, in the State of Maryland.

 (SEAL).
Examiner.

There are **no**..... Exhibits with these depositions, to wit:
Plaintiff's..... Exhibit.....
.....
.....
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 **none**..... by the Defendant.....


Examiner.