

In The Court of
27 B 196
Baltimore City 1921

Josiah Young

vs

Harbo Young

Special Counsel

Mr. Clerk please file
(Signature)

B 22383
(1) (2)

DAVIS & BISHOP
ATTORNEYS AT LAW

BANNER BUILDING
14 E. PLASANT STREET
BALTIMORE, MD.

(Signature) 20 April 1921
" 21 " "

Josiah U. Young

In The Circuit Court

vs.

of

Hattie J. Young

Baltimore City.

To The Honorable, The Judge of Said Court,

Your Orator complaining respectfully says:-

FIRST, That the parties hereto were married in Baltimore, State of Maryland, December 30th. 1896 by Rev. Joseph Wheeler, and lived together as man and wife until on or about March 17th. 1915.

SECOND, That your Orator 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 the city and state and when last heard of was in Atlantic City, New Jersey.

THIRD, That though the conduct of your orator towards his wife has always been kind, affectionate and above reproach, she without any just cause or reason abandoned and deserted him, and lived in adultery with lewd and abandoned men whose names are unknown to your orator; that such abandonment has continued uninterrupted 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 and adultery, that he has never cohabited with the said respondent since the said desertion and adultery.

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

WHEREFORE YOUR ORATOR PRAYS:

a-a A divorce a vinculo matrimonii from the defendant.

b-b Such other and further relief as the case may require.

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.

As in duty bound etc.

Josiah U. Young

Complainant

C. [Signature]

Solicitor for Complainant

State of Maryland }
Baltimore City } To Wit:

I hereby certify that on this ~~18~~ day of *April* 1921, before me the subscriber, a notary public in and for ~~Baltimore City~~, *Atlantic City*, State of ~~Maryland~~, *New Jersey*, personally appeared Josiah U. Young, the complainant in the foregoing bill and made oath in due form of law that the matter contained in the same was true to the best of his knowledge and belief.

As witness my hand and seal.

Isaac Bailey

Notary Public.
Justice of Peace

Original

J. Steward Davis, Solicitor.

14 E. Pleasant St.

B 196
1921

In the Circuit Court of Baltimore City.

Josiah U. Young versus Hattie J. Young.

ORDER OF PUBLICATION.

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

The Bill states that the parties thereto were married in Baltimore, Maryland by Rev. Joseph Wheeler, December 30th. 1896 and lived together as man and wife until March 17th. 1915. 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 Atlantic City, New Jersey. That though the conduct of the plaintiff towards his wife was always kind and affectionate and above reproach, she without just cause or reason abandoned your orator to live in adultery with lewd and abandoned men whose names are unknown to your orator. And has declared her intentions not to live with her any longer; and that the said abandonment has continued uninterrupted for more than three years prior to the filing of this bill of complaint; and that the separation of the parties are beyond any reasonable hope or expectation of reconciliation. That there are no children born as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City, ordered this ~~20~~²¹th. day of April, 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 ²³ day of ~~May~~^{May} 1921. and give notice to the said defendant, Hattie J. Young (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 ⁸ day of ~~June~~^{June} 1921 to show cause if any she may have why

a decree should not be passed as prayed.

REMITTANCE PARAGON BANK

H. Arthur T. ...

MADE IN U.S.A.

True copy
test

Clark Whiteford

Apr 23.70 AM 7.14

OK

196
192 1 B61 Docket No.

Young

vs.

Young

Certificate of Publication

B 22383
3

THE DAILY RECORD.
Filed *8* day of *Sept* 192*1*

THE DAILY RECORD

Baltimore, MAY 14 1921, 192

J. Steward Davis, Solicitor,
14 East Pleasant Street.

IN THE CIRCUIT COURT OF-BALTI-MORE CITY-(B-196-1921)-Josiah U. Young vs. Hattie J. Young.

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 Baltimore, Maryland, by Rev. Joseph Wheeler, December 30th, 1896, and lived together as man and wife until March 17th, 1915. 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 Atlantic City, New Jersey. That though the conduct of the plaintiff towards his wife was always kind and affectionate and above reproach, she, without just cause or reason, abandoned your orator to live in adultery with lewd and abandoned men, whose names are unknown to your orator. And has declared her intentions not to live with him any longer; and that the said abandonment has continued uninterruptedly for more than three years prior to the filing of this bill of complaint; and that the separation of the parties is beyond any reasonable hope or expectation of reconciliation. That there are no children born as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City, ordered, this 22nd day of April, 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 23rd day of May, 1921, and give notice to the said defendant, Hattie J. Young (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 8th day of June, 1921, to show cause, if any she may have why a decree should not be passed as prayed.

H. ARTHUR STUMP.

True copy-Test:

CHAS. R. WHITEFORD,
Clerk.

ap23,30my7.14

We hereby certify that the annexed advertise-

ment of Order

Publication Circuit Court

of Baltimore City, Case of

Josiah U. Young,
Hattie J. Young

vs.

was published in THE DAILY RECORD, a daily

newspaper published in the City of Baltimore, once in

each of *Four* successive weeks before the

23rd day of *May*, 192*1*

First insertion *April 23rd*, 192*1*

THE DAILY RECORD.

Per *Thaddeus W. Cropper*

196 B61 Ct. Ct.
1912 Docket

Young
vs.

Young

Decree Pro Confesso.

B 22383

Sept No.
4

Filed *Sept* 1912



Josiah Young
vs.

Hattie Young

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 *eight* day of *September* 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.

Robert J. Stanton

STATE OF MARYLAND,
BALTIMORE CITY, SCT :

I hereby certify that on this *8th* day of *Sept* 19 *21*

before me, the subscriber, a Notary Public, of the State of Maryland, in and for the City aforesaid, personally appeared *Josiah Young* 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.

* *Josiah H. Young*



3/12/1932

Doc. B $\frac{196}{1921}$

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Josiah Young

vs.

Hattie Young

No. 22383 B.

PLAINTIFF'S COSTS

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

DEFENDANT'S COSTS

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

Ad 4 Oct 1921

Josiah Young

vs.

Hattie Young

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

8-4-30

Young,
v.
Young.

Testimony taken at the office of Bishop and Davis, Pleasant Street, Baltimore, Maryland, September 8th 1922, at 3 O'clock P. M.

JOSIAH U. YOUNG, the Plaintiff in this case, produced on his own behalf, having been first duly sworn, deposeseth and saith as follows, that is to say:

BY THE EXAMINER:

1 Q. State your name residence and occupation?

A. Josiah U. young, 1809 Etting Street; general express - general hauling.

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. When were you married?

A. I was married the 20th., December 1896.

2 Q. And the Minister's name.

A. The Reverend M^r. Joseph^h Wheeler.

3 Q. And you and your wife lived together until on or about the 17th., of March 1915?

A. Yes.

4 Q. Have you been a resident of Baltimore City, State of Maryland, for more than two years prior to the filing of this suit?

Josiah S. Young.

A. Yes.

5 Q. And your wife, the Defendant in this case, is a non resident of this City of Baltimore and the State of Maryland.

A. Yes.

6 Q. And the last you heard of her she was where?

A. The last that I heard of her she was in Atlantic City.

7 Q. What was your conduct towards your wife?

A. I always tried to treat her kind and I did everything that I was able to do as a husband.

8 Q. Did you support her?

A. Yes.

9 Q. Your treatment was kind and affectionate and above reproach?

A. Yes.

10 Q. And were you true to her?

A. Yes.

11 Q. Did you give her any reason for leaving you?

A. None whatsoever.

12 Q. your wife abandoned you when she was living in Atlantic City, New Jersey.

A. Yes.

13 Q. That was March 1915.

A. Yes.

J. S. Young.

14 Q. State what occurred previously, - thenight before.

A. I came home one night about twelve O'clock, and I found her in a room with Albert Mont^teir, and we had quite an understanding about it, and finally I accused her openly of her adultery, and she did not deny the fact.

15 Q. He was in her bed room?

A. Yes.

16 Q. And when you asked her what did she say.

A. She said that I could go to the devil.

17 Q. you were living where in Atlantic City.

A. 1028 Mediterranean Avenue.

18 Q. After you discovered her with Albert Mont^teir, she left you?

A. Yes.

19 Q. Did she continue to reside in Atlantic City, New Jersey.

A. She did for a while and then she went to Philadelphia.

20 Q. And with whom did she live?

A. John Arthur.

21 Q. She lived with him as his common law wife.

A. Yes, in Atlantic City as well as Philadelphia.

J. S. Young.

22 Q. Did you ever see John Arthur go to her room?

A. All the while; whenever I passed there, I could see her after she left me, and I passed there and I saw them; they did not mind me seeing her at all.

23 Q. He was living in the house.

A. Yes.

24 Q. Where was she living at that time.

A. She had the first floor you might as well say; it was a sort of basement and you could look right in.

25 Q. And you could see them?

A. Yes; it was on North Carolina Avenue side, and you could see in the bed room.

26 Q. How long would he stay there.

A. I would see him in the early evening and in the early morning coming out, so I guess he stayed there all night.

27 Q. Did you ever see the light go out after he went in.

A. Yes; many a time; I looked for that particularly.

28 Q. After your wife left you and you discovered her with Albert Monteir, did you discover any other adultery that your wife committed in Baltimore City before you moved to Atlantic City.

A. I discovered a whole lot.

J. S. Young.

29 Q. What did you discover.

A. There was a James Dockens I discovered.

30 Q. During the time that you were living in Baltimore City, did your wife disappear for any length of time.

A. I remember one particular occasion, - one occasion that she went away as I thought, and I thought that she was working and staying at her working place, but I have discovered after that - I did not find it out for years afterwards - that she was right in the house where I was, staying in a room with one William Hall.

31 Q. What floor was that?

A. The third floor.

32 Q. And where were you?

A. I slept on the first floor ; it was like an apartment house.

33 Q. Has the abandonment of you by your wife continued uninterruptedly for more than three years prior to the filing of this Bill of Complaint?

A. Since 1915.

34 Q. It has continued uninterruptedly for six years?

A. Yes.

J. S. Young.

35 Q. It was her own deliberate and final act?

A. Yes.

36 Q. Is there any reasonable hope or expectation of a reconciliation?

A. No sir; none whatever.

37 Q. Have you ever condoned or forgiven the offense of desertion or adultery?

A. No sir.

38 Q. Have you ever lived with her since you discovered her adulteries or since the desertion.

A. No sir.

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

A. Nomsir.

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

Josiah W. Young

MILTON GILLIARD, a witness of lawful age, produced on behalf of the Plaintiff, having been first duly sworn, deposeseth and saith as follows, that is to say:

BY THE EXAMINER:

- 1 Q. state your name residence and occupation?
- A. Milton Gilliard 1912 White street; machinist.
- 2 Q. Do you know the parties to this suit?
- A. Yes.

BY MR. DAVIS:

- 1 Q. You were not present at the wedding?
- A. NO.
- 2 Q. Did Mr. and Mrs. young live together as husband and wife in Baltimore City?
- A. They did.
- 3 Q. And was their reputation in the community that of husband and wife?
- A. Yes.
- 4 Q. And did he hold her out as his wife in the community?
- A. Yes.
- 5 Q. Did you ever visit them while living together as husband and wife?
- A. I lived with them.
- 6 Q. Where was that?
- A. 330 West Preston Street.
- 7 Q. You went to live with them shortly after the mar-

Milton Gilliard.

riage.

A. I guess five or six years.

8 Q. Five or six years after the marriage.

A. Yes.

9 Q. Do you know that the Plaintiff in this case has been a resident of Baltimore City, State of Maryland, for more than two years prior to the filing of this suit?

A. Yes.

10 Q. All his life.

A. Yes.

11 Q. And his wife, - she is a resident of what City and State?

A. Atlantic City, I believe.

12 Q. She is not a resident of the State of Maryland.

A. No sir.

13 Q. And the last you heard of her she was in Atlantic City, New Jersey.

A. Yes.

14 Q. What was the conduct of Mr. Young towards his wife; how did he treat her.

A. He treated her as a man should treat a wife, and he supported her and was kind to her.

15 Q. And affectionate to her.

Milton Gilliard.

A. Yes.

16 Q. And true to her.

A. Yes.

17 Q. Did she give him -- Did he give her any cause or reason to abandon and desert him?

A. No sir.

18 Q. What, if anything, do you know as to Mrs. Young being intimate with men other than her husband?

A. I know of one or two.

19 Q. Name them.

A. One of them was James Dockens.

20 Q. Have you ever seen her with James Dockens.

A. Yes.

21 Q. How often.

A. Four or five times.

22 Q. Where did you see her.

A. I saw her several times at Biddle and Linden Avenue, I believe it was.

23 Q. Would they meet there.

A. Yes.

24 Q. Would it be night or day?

A. Night often.

25 Q. And they would do what there?

A. They would get on a street car or walk away.

Milton Gilliard.

26 Q. Have you ever seen Mr. Dockens call to see the Defendant in this case.

A. Yes; I saw him at the house.

27 Q. In whose house.

A. 320 West Preston Street; I saw them when I was living there.

28 Q. Did he come there often.

A. He did not come so often; probably three - two or three times a week; sometimes more than that.

29 Q. And he would stay quite sometime when he was there.

A. Yes.

30 Q. This man Hall; what do you know about Hall.

A. Yes; there was a Hall; that is when Mr. Young was living on Dolphin Street and he conducted a business on Dolphin street; billiard and pool parlor and I saw Hall there to see his wife. Of course, the building was divided into practically two parts, and a door came right out into the alley called Jenkins Alley, and the front door was the door to Mr. Young's business.

31 Q. And Hall would go in the Jenkins Alley entrance?

A. Yes.

32 Q. And where was Mrs. Young's room at that time.

A. That is the second floor, but Hall and her

Milton Gilliard.

would occupy the third floor.

33 Q. There was a bed room up there?

A. Yes; there must have been.

34 Q. Do you know the time when she slept there for about two weeks.

A. Yes, and she was supposed to be at her service place where she was working and she was on the third floor with Hall, and he did not know where she was, because I met ^{Young} ~~Max~~ and ~~Isak~~ ~~Heim~~ where she was, and he said that he guessed that she was working, he said "I have not seen her for two weeks".

35 Q. You told him about this after the separation.

A. Yes.

36 Q. That is, about Dockins and Hall.

A. Yes.

37 Q. Did Mr. Young know at the time this - these things occurred; did he know them.

A. Not to my knowledge; he seemed to be surprised when I told him.

38 Q. How long afterwards was it that you told him.

A. About three or four years afterwards.

39 Q. Mr. Young has never forgiven or condoned the offense of adultery of his wife?

A. Not that I know of.

40 Q. He has never lived or cohabited with her since

Milton Gilliard.

he discovered it.

A. No sir.

41 Q. There is no chance of their making up, or a reasonable hope or expectation of a reconciliation.

A. No sir; it would not be with me.

42 Q. Mr. Young has said that his wife is guilty of adultery and you have testified about an occasion with a man named Hall; how do you know that she was with this man Hall.

A. I know that it was on the third floor and I know that they were together.

43 Q. How do you know that.

A. I lived in the second floor back room, and this room was over top of me, and I could see one another of them going in there.

44 Q. Where was Mr. Young?

A. Mr. Young occupied the first floor; he had the pool room in the front, and he slept in the dining room.

45 Q. How was it that you saw Mrs. Young there on the third floor in a bed room with this man and Mr. Young did not see this.

A. Mr. Young was downstairs.

46 Q. How about the alley entrance?

A. And there was an alley entrance.

Milton Gilliard.

47 Q. Where did Mr. and Mrs. Young sleep when they slept together.

A. In the dining room on the first floor.

48 Q. This dining room, - was it off from the entrance to the second and the third floor.

A. The dining room of the building is along side of the building.

49 Q. But is it near the entrance to the second and third floor.

A. No; there is a stairway that goes from Jenkins alley right up.

50 Q. Was it possible for Mrs. Young to enter this house without the knowledge of her husband.

A. O, yes; sure; it was very easy.

51 Q. Now, during these two weeks did Mr. Young continue to sleep in the dining room?

A. Yes.

52 Q. And did he at any time enter the other part of the building.

A. Not to my knowledge, because he had the other part of the building rented out.

53 Q. And you say that it was possible for Mrs. young to enter the third floor without the knowledge of her husband?

A. Yes.

54 Q. Now, these two weeks that she slept with Hall what two weeks were they.

Milton Gilliard.

A. I should think that it was about 1911 or 1912.

55 Q. Did you actually see them go into the bedroom together.

A. No; I did not see them go into the bedroom together; I saw her go into the room, and then Hall went into the room.

57 Q. Did you see him come out in the morning.

A. I would see Hall come in and out.

58 Q. How do you know that Mrs. Young occupied this room on the third floor of the house with Hall for two weeks.

A. I only saw Mrs. Young and this man Hall in the room on one occasion, and that was the first beginning of the two weeks; on that occasion they stayed in the room about an hour. I did not see them occupying the room for two weeks as husband and wife; I am only telling about the one occasion when I saw them go into the room together, but it was during the two weeks supposed absence of Mrs. Young that I saw this, and I presumed that they occupied the room for the two whole weeks, because I asked Mr. Young where his wife was and he said that she was at her service place.

Milton Gilliard.

59 Q. Now, Mr. Young has testified that his wife abandoned and deserted him on the 17th., of March 1915; will you state whether or not Mr . Young has lived separate and apart from his wife since that time?

A. They have been separated about six years that I know of.

60 Q. And in your opinion is the separation and abandonment deliberate and final?

A. Yes.

62 Q. State whether or not there is any reasonable expectation of a reconciliation; do you ever expect them to make up and live together again?

A. No sir.

JAMES S. WOOLFORD, 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. James S. Woolford, 2518 Oak Street; butler.

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

A. Yes.

BY MR. DAVIS:

1 Q. You were not present at the wedding?

A. No sir.

2 Q. Did you ever live at the residence of Mr. and Mrs. Young?

A. When I first came to Baltimore in 1906, I guess I stayed there five or six weeks, and then I visited him frequently. He is my Uncle.

3 Q. What was their reputation in the community; that of husband and wife?

A. Yes.

4 Q. They lived together as husband and wife?

A. Yes.

5 Q. And Mr. Young held her out as his wife in the community?

A. Yes.

6 Q. Has the Plaintiff been a resident of Baltimore City, State of Maryland, for at least two years prior to

James S. Woolford.

the filing of this suit?

A. Yes.

7 Q. In fact much more than two years.

A. Yes.

8 Q. And is his wife a resident of this City and State.

A. Atlantic City, New Jersey, as far as I know.

9 Q. She is a non-resident of Maryland.

A. Yes.

9 Q. And when last heard of she was in Atlantic City.

A. Yes.

10 Q. What sort of a husband was Mr. Young towards his wife?

A. Very affectionate.

11 Q. Did he work regularly.

A. Yes.

12 Q. And was he kind and affectionate?

A. Yes.

13 Q. Was he true to her?

A. Yes.

14 Q. Did he give his wife any cause to abandon him or commit the acts of adultery as alleged.

A. Not that I know of.

15 Q. State what, if anything, you know of Mrs. Young's intimacies with men.

James S. Woolford.

A. only during the time that I stopped at his house.

16 Q. What house was that.

A. 324 west Preston Street.

17 Q. Go ahead.

A. I called and I saw Dockens there and sometimes I would be in the house when he was there, and often he would come in while I was there.

18 Q. About how many times a week did Dockens come there.

A. I can not tell you that; he would come any time.

19 Q. Was Mr. Young there at those times?

A. Very seldom.

20 Q. Where would he be?

A. At work.

21 Q. What was he doing.

A. He was running a pool room then.

22 Q. Would Dockens come there at night.

A. Yes; that is the only time that I saw him there.

23 Q. And when you left and went out would you leave Dockens and Mrs. Young in the house together.

A. Yes.

James S. Woolford.

24 Q. When you would return would he still be there or gone?

A. Sometimes he would be gone.

25 Q. So at times he stayed there two and three hours?

A. Yes.

26 Q. At this place on Preston Street.

A. Yes.

27 Q. And at that time Mr. Young was running a pool room on Dolphin Street.

A. No, at the corner of Eutaw and that other street.

28 Q. Did you ever see Mrs. Young meet this man Dockens any where else other than his home? - Mr. Young's home.

A. I saw her several times on the street talking to him; I did not see her in a party or any where; I saw them on the street talking.

29 Q. You saw them on what Street together.

A. I saw them on Eutaw Street and I saw them on Biddle Street.

30 Q. Would she meet him there.

A. They were standing there; they must have met.

31 Q. Where did they go.

James S. Woodford.

A. I did not see where they went.

32 Q. This man Hall, - do you know anything about hall .

A. Yes; I know him.

33 Q. Where did you see Hall.

A. At the Dolphin street house.

34 Q. You alled to see whom? I mean he, whom didAhe call to see.

A. I do not know.

35 Q. Well, Was Mrs Young there.

A. Yes; most of the time she was there, and one or two other girls; they stopped at the house.

I can not say who he came to see.

36 Q. Do you recall the time that Mrs. Young was away for two weeks, and her husband did not know where she was.

A. I did not see it.

37 Q. Do you recall the time.

A. Yes; I remember the time that he said that she was away.

38 Q. Do you know whether or not Hall falled at the Dolphin street house at that time.

A. No.

39 Q. Do you know that Mrs. Young was there living on the third floor.

James S. Woolford.

A. I do not know where she was living; I know where she was supposed to live. They had a room on the first floor.

40 Q. Are Mr. and Mrs. Young living together now?

A. No sir.

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

A. She left him.

42 Q. About how long ago did she leave him.

A. About six years ago.

43 Q. Mr. Young has testified that she left him March 15th., 1915; is that about the time.

A. Yes.

44 Q. Did she have any just cause or reason to abandon and desert her husband at that time?

A. Not that I know of.

45 Q. Outside of what you know personally about the abandonment of her husband by her, have you talked with Mrs. Young since she abandoned and deserted her husband?

A. Yes.

46 Q. Did she go into details with you with reference to the separation?

A. Yes; to a certain extent; she said that they were not living together and that she had left him.

James S. Woolford.

47 Q. You already knew this, of course.

A. Yes.

48 Q. When was this that she told you this?

A. About two years ago as near as I can come to it.

49 Q. And did she tell you about when and where she left her husband; that is, did she tell you in what City she left her husband?

A. Atlantic City.

50 Q. She told you that she had left her husband in Atlantic City.

A. Yes.

51 Q. Of your own personal knowledge, will you state whether or not this abandonment has continued uninterruptedly for the last six years.

A. Yes; as far as I know.

52 Q. State whether or not said abandonment was deliberate and final; did she deliberately and finally abandon and desert her husband.

A. Yes.

53 Q. State whether or not there is any reasonable expectation of a reconciliation; do you ever expect them to make up and live together again?

A. No sir; I dont.

54 Q. In fact she told you that she would not live with him again, did she not.

James S. Woolford.

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
James S Woolford

MILTON GILLIARD, a witness of lawful age, heretofore produced and sworn, recalled:

BY MR. DAVIS:

1 Q. You say that you know that Mr. and Mrs. Young separated about six years ago.

A. Yes.

2 Q. Mr. Young has testified that it was about the 17th., of March 1915; will you state whether or not that is about right?

A. Yes.

3 Q. How do you know that she abandoned and deserted her husband.

A. She told me that she had left him.

I asked her about that when she was over here; I said "Where is Jim" and she said "I have left him" she said "in Atlantic City; I am not with him any more, and I don't intend to live with him any more.

4 Q. When was this that you had this conversation with her.

A. About Spring three years ago.

5 Q. But prior to that time you knew that they had already been separated.

A. Yes.

6 Q. And you were confirming what you already knew in your conversation with her when you met her.

A. Yes. I knew him and her, and when I saw her I asked her for him; I knew that they were parted but I did not know that they were still parted until she told me

Milton Gilliard.

7 Q. Did she tell you when and where she had left her husband?

A. In Atlantic City about six years ago.

8 Q. Has this abandonment continued uninterruptedly for the last six years.

A. Yes.

9 Q. State whether or not said abandonment was deliberate and final; did she deliberately and finally abandon and desert her husband?

A. Yes; I think so.

10 Q. State whether or not there is any reasonable expectation of a reconciliation?

A. No sir; there is not.

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 ay 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.---

Milton Ellwood

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 12 day of October 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 two 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.

196 Circuit Court
19 21 B61 Docket No.....

Josiah Young
vs.

Hattie Young

Order of Reference
and Report

B 2 2383

No. (6) ✓

Order Filed 19 day of October 1921

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

Joseph Young

1916

vs.

Wanee Young

IN THE
Circuit Court

OF

BALTIMORE CITY

Sept Term, 19 *21*
19

This case being submitted, without argument, it is ordered by the Court, this
day of *October*, 19 *21*, that the same be and it is hereby referred to
Alex H Robertson, Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.

Chas W Heniker

Report of Auditor and Master

Bill filed by husband against wife for divorce A Vinculo
Matrimonii for abandonment for three years and adultery of defendant.
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 and adultery of defendant. Case ready
for decree.

Alex Robertson
Auditor & Master.

CIRCUIT COURT

B. 196
1921 No. Docket

Josiah Young

vs.

Hattie Young

Recorded

Folio 267 1921

Decree of Divorce

B 22383
B No.

7

fd 2nd Novembe 1921

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

Alon W. Robertson
Auditor and Master.

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

..... Josiah Young

VS.

..... Hattie Young

..... September Term, 19 21.

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

It is thereupon, this Second day of ~~October~~ November, A. D. 1921.

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

..... Josiah Young

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

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

Charles H. Hunsler