

JOHN J. DONNELLY, JR.
Attorney at Law
821 15th Street, N. W.
Washington, D. C.

August 3, 1944

Judge George A. Bartlett
Biltz building
Reno, Nevada

Dear Judge:

Let me pick up on our correspondence of April last with regard to the lady who wanted the divorce.

She has been particularly difficult as she is the woman scorned in favor of one younger, etc. Consequently, she has been on the verge of signing a separation agreement and leaving for Nevada since April. The matter has now come to the point where the husband in desperation suggests he come to Nevada and file suit. After which the wife, without coming to Nevada, would file a cross-bill and prove up her case by means of Deposition, or testimony before a special commissioner here in Washington appointed for the purpose by your court (a la Doris Duke), or perhaps interrogatories of the husband served on him by the wife's Reno attorney in answering which he would admit a prima facie case against himself.

My question now is: Is such a thing possible?

If it is, the wife will sign the separation agreement we have worked out settling all property rights and custody of the child, sign the power of attorney to a Reno attorney, and expect to be granted a Nevada decree without ever being present there, on the basis of the cross-bill filed in her behalf by her Reno attorney.

These parties are substantial, the husband being a successful lawyer. If you will indicate whether such a thing is legally possible in Nevada, we will go ahead.

Very best wishes and personal regards from Mrs. Donnelly and myself to you, and the Misses Bartlett.

Sincerely,

John Donnelly

JJD:ma

August 8, 1944.

John J. Donnelly, Jr.
541- 10th Street, S. W.
Washington, D.C.

Dear John:

Replying to your letter of August 3rd, your plan is quite possible, in fact, Mr. Woodburn of the firm suggested to you when I sent you the Power of Attorney, tells me that he has had several such cases recently, and that they all worked out well.

So send along your Plaintiff and I will look after him and file Complaint after his six weeks residence.

Thatcher and Woodburn will look after Defendant and file Answer and cross-bill, and we will then prepare stipulation for the deposition. I suggest that you communicate with said firm.

With kindest regards in which the kids join,

Sincerely,

GAB:ch

*Shannon
my husband
Placerville*

JOHN J. DONNELLY, JR.

Attorney at Law
821 15th Street, N. W.
Washington, D. C.

April 12, 1944

Hon. George Bartlett
Attorney at Law
Reno, Nevada

Dear Judge Bartlett:

You will remember me as having been associated with Senator Key Pittman and your kindness to me in August 1942 in the matter of my divorce.

I represent a lady who plans to leave for Reno about the middle of June for the purpose of obtaining a divorce, and will have with her her 13 year old daughter. As she is of some means and desires to be comfortable while there, I suggested she might spend the required residence period at Lake Tahoe, coming down to Reno for the divorce hearing and decree. I don't know what the inns at the Lake on the Nevada side would charge. Could you give me this information? Ten to twelve dollars a day American plan (with meals) would be about right from their standpoint.

Prior to her leaving here, I will have had executed a formal separation agreement between her and the husband, to be made a part of the divorce decree, and disposing of all questions of support, division of property, custody of the child, etc. Her grounds would be extreme cruelty, mental in nature, or however you would phrase it.

If you will send me the appropriate forms for appearance and waiver on the part of the husband, I will have them executed and returned.

In the matter of your fee, I mentioned \$400 as covering the costs and fees of both Nevada attorneys. I don't know whether this would be in line or out of line, and therefore will appreciate your comments. Of course in view of your kindnesses to me, there would be no forwarding fee.

Trusting this finds you enjoying your customary good health and contentment, I am,

Sincerely,

John Donnelly

JJD:ma

via AIR MAIL

April 19, 1944

John J. Donnelly, Jr.
Attorney at Law
621 15th Street, N. W.
Washington, D. C.

My dear John:

Replying to yours of April 12th. I have delayed immediate answer for a couple of days in the hopes of locating the manager of a very comfortable and desirable hotel with cottages at Glenbrook at the south end of Lake Tahoe but I am told that he may not be at the Lake until the middle of May but that reservations may be made between the first part of May and the middle. Reservations will be taken very rapidly as it is a very popular place and the rates are just as you have stated in your letter, from \$10 to \$12 per day per person.

I suggest that you let me know as early as possible just about the time our client will arrive so that I can have my daughter Dorothy secure reservations.

I am enclosing a form of Power of Attorney which you can fill out and have executed by the defendant and suggest that you use the firm of Thatcher and Woodburn to represent him.

As to costs referred to in the latter part of your letter they are O.K. and as to the forwarding fee I will take care of that so you can have no kick.

With kindest personal regards always, I am

Sincerely,

GAB:vw
1 encl.

JOHN J. DONNELLY, JR.

Attorney at Law
821 15th Street, N. W.
Washington, D. C.

August 24, 1944

Judge George Bartlett
232 Court Street
Reno, Nevada

via air mail
special delivery
registered

Dear Judge Bartlett:

In regard to the divorce matter we have been corresponding on, the wife left today and will arrive Reno on the Overland Limited this coming Sunday, August 27th, accompanied by her 13-year old daughter. Not knowing your policy but remembering that of other attorneys there, I indicated to Mrs. [REDACTED] that you probably have them met by someone, if not by yourself.

For accommodations, they want to go to the Lake, probably Glenbrook if the rates are not too high. However, for the first night or two after arrival, they will stay in Reno, at the El Cortez if you can get a room there. Mrs. [REDACTED] will feel better if you can draw the complaint, etc., the day or two after arrival, leaving the balance of the time unburdened by thinking and wondering as to what the proceeding is like.

As you will note from the enclosed executed copy of the separation agreement, all arrangements have been made as to division of property, maintenance, and custody, and that any decree of divorce is to have incorporated in it the provisions as to maintenance and custody only. This copy is the third executed one, husband and wife each having their own.

Also enclosed herewith is Power of Attorney of the husband designating Thatcher and Woodburn to act for him. I understand he will write them independently, and will insist they move for closed hearing and sealed testimony, in the event you do not do so. It may be Mrs. [REDACTED] will not be satisfied unless the proceeding is entirely public -- and in such event I understand the husband does not want the matter gone forward with. However, be that as it may, I represent the wife and her wishes would control me. After reflection, if the wife should want the matter public, I believe she would reconsider.

August 24, 1944

In our correspondence, I asked if \$400 would cover the fees of both sides in Reno, and costs, and you indicated it would. The husband told me he will send on a check in that amount, perhaps a week before the trial. He is responsible, being Assistant General Solicitor of the Southern Railway.

Mrs. [REDACTED] is very alert mentally, and I understand she was, in the past, secretary to Secretary of State Frank Kellogg, and to Supreme Court Justice Stanley Reed. However, as all women are in these situations, she may want to be too minute and detailed. Also she has some reservations about being a resident of Reno, etc. For these reasons, it would probably be to the advantage of everyone if all the papers could be drawn and evidence gone over, and then she go to the Lake to remain until the day of trial, or so. Incidentally, she may ask to have the trial in Carson City instead of Reno.

I know this letter will find you in your customary good humor, and I hope in good health.

Sincerely,

John J. Donnelly, Jr.

JJD:ma

Encls: (1) separation agreement
(2) power of attorney

ROOM NO.

219

NAME

Mrs. Adeline

ARRIVE 8-27-44

RATE

ADDRESS

DEPART

6.00

3601 Connecticut Ave N W

ACCOUNT NO.

STATE

CLERK

6594

Washington D C

DA

No 964 G

GUEST ACCOUNT
HOTEL EL CORTEZ
RENO, NEVADA

	BALANCE	DEPT.	AMOUNT	DATE
1	6.00		6.00	AUG 27
2			0.10	AUG 28
3	12.10		6.00	AUG 28
4	1.00		6.00	AUG 29
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James L. [Redacted]
Hotel El-Cortez

AUG 30 4 00 PM '44

September 1, 1944

AIR MAIL

Mr. Lucien M. [REDACTED]
Southern Railway System
McPherson Square
Washington, D. C.

Dear Mr. [REDACTED]:

Under date of August 24th, 1944 Mr. John J. Donnelly, Jr., attorney at law, Washington, D.C., forwarded to Judge Geo. A. Bartlett of this city, as counsel for Mrs. [REDACTED], a Power of Attorney executed by you authorizing our firm to represent you in the contemplated action for divorce.

The following is an excerpt from said letter:

"Enclosed herewith is power of attorney of the husband designating Thatcher and Woodburn to act for him. I understand he will write them independently, and will insist they move for closed hearing and sealed testimony, in the event you (Judge Bartlett) do not do so."

Judge Bartlett and Mrs. [REDACTED] have called at my office and they advise that Mrs. [REDACTED] will not object to a closed hearing.

Mrs. [REDACTED], however, states that she desires that the provisions with reference to the custody of the daughter as appears in Paragraph 2, page 3 of the agreement, shall be modified to the extent that you shall have reasonable rights of visitation, but which rights on your part may be terminated if at any time you permit the daughter Nancy to be brought in contact with one Martha Jane [REDACTED]. She wants the language practically identical with that of a suggested form of agreement which you prepared and submitted to her on May 20th.

Mr. Lucien M. [REDACTED]

Page #2

9/1/44

In this connection Mrs. [REDACTED] states that to give her the sole and exclusive custody of the child without any visitorial privileges on your part might, in her opinion, seriously affect the love and affection which she states the child now has for you. In other words, she does not want to take that full responsibility and desires that you shall have certain rights of visitation; provided however, that such rights are to be terminated if you violate the provision as above stated.

Will you kindly advise us with reference to these matters after taking up the matter with Mr. Donnelly, if you see fit?

Yours very truly,

WW:VM

Sept. 2, 1944

John J. Donnelly, Jr., Esq.

N.W.

821 15th, Street, Washington, D. C.

Re: [REDACTED]

Dear John:

Several conferences have been had with our client during the week, in which I have been trying to adjust matters of disturbance; the re: private hearing is now O. K.

Two conferences with Mr. Woodburn, the last yesterday afternoon, resulting in what is set forth in his letter, dictated in our presence, and which said copy has just been sent over to me at my request, for forwarding to you, and which is self-explanatory. I assume you may have a bit of difficulty in getting the supplemental agreement, but please be assured there will be no publicity, as copies only will be used in trial, marked Plaintiff's Exhibits A and B, sealed, and approved, confirmed and by reference only adopted and made part of Decree and Judgment.

I wish you luck, and with kindest regards,

Sincerely,

B/P

JOHN J. DONNELLY, JR.
Attorney at Law
821 15th Street, N. W.
Washington, D. C.

September 6, 1944

Hon. Geo. A. Bartlett
Biltz Building
Reno, Nevada

Dear Judge Bartlett:

Your air mail letter of September 2nd was probably delayed by Labor Day, as it came to my hand just yesterday.

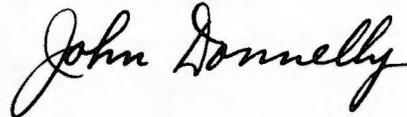
Upon checking I find Mr. [REDACTED] will be out of this city until Monday next, and when he returns I shall take this matter up with him promptly.

You probably have the answer to this question, but it has me wondering. If such a supplemental agreement were made a part of the final decree only by reference, how could the wife enforce it in the event of future violation of its terms. How could she produce and prove the supplemental agreement as part of the decree.

I will write further as soon as I develop the matter with Mr. [REDACTED].

Best regards.

Sincerely,



JJD:ma
air mail