

Reno, Nevada, Oct. 9 1917

M Woodburn P Bartlett

Attorney.. for Plaintiff
Defendant

File 1
12588

Margaret G. [redacted] Plaintiff
vs [redacted]
John Lloyd [redacted]

To **County Clerk**
Washoe County Dr.

Oct 9 For filing complaint \$10.00

PAID
E. H. BEEMER
BY S. R. Ellithorpe

MCKNIGHT & STEINBOCK
ATTORNEYS AND COUNSELORS AT LAW
81 EAST 125TH STREET
CORN EXCHANGE BANK BUILDING
NEW YORK

October 16th, 1917.

In Re:-

Woodburn & Bartlett, Esqrs.,
Counsellors-at-Law,
Reno, Nevada.

Gentlemen:

With reference to the matter of [redacted] against [redacted], being an action brought by you in the Second Judicial Court of the State of Nevada, summons filed October 9th, 1917, permit me to state that Mr. J. L. [redacted], the defendant in said action has consulted me today with reference to the action.

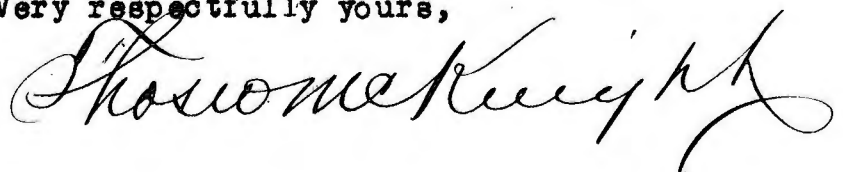
Of course I understand that the plaintiff would like us to retain an Attorney right in Nevada, for you and I understand thoroughly that her divorce is of no value even were a decree granted, her divorce only being valid in the State of Nevada, unless our client files an appearance by Attorney within your State.

For your information, would state that the complaint is unwarranted and not founded upon fact. The defendant has a splendid counter-claim but will not interpose one unless we deem it advisable.

We have not gone into the matter with him at all as we see no occasion for doing so at this time. We might advise a course for him to pursue, provided you send us an Amended Complaint, striking out from your complaint that part thereof upon the last page of the complaint, beginning at line 7 and ending at line 17. Should you do this, it is more probable that we will advise the defendant to appear in the action through a Nevada Attorney but not contest the matter.

Very respectfully yours,

McK:W.



October 24, 1917.

McKnight & Steinbock, Esqrs.,
81 East 125th St.,
New York, N.Y.

Gentlemen:

IN RE. [REDACTED]

Replying to your favor of October 16th, we have taken up the subject matter of your letter with Mrs. [REDACTED], and find that she would be willing to amend the particular portion of the complaint referred to, contained between lines 7 and 17 of page 4 of said complaint, so as to provide that plaintiff be awarded the custody, care and control of the children during six months of each year, during which time defendant should pay for their maintenance the sum of \$25 per month each, and that defendant have the custody, care and control of the children during the other six months of the year.

We feel that this is so fair a suggestion that your client will probably accede to it at once, and that the matter can then be disposed of.

Very truly yours,

WOODBURN & BARTLETT,

By

MCKNIGHT & STEINBOCK
ATTORNEYS AND COUNSELORS AT LAW
81 EAST 125TH STREET
CORN EXCHANGE BANK BUILDING
NEW YORK

In Re: [REDACTED]

October 29th, 1917.

Woodburn & Bartlett, Esqrd.,
Reno, Nevada.

Gentlemen:

We are in receipt of your favor of October 24th, relative to the above matter, and after receiving same we sent for our client and find that the conduct of the plaintiff while she resided in the City was such that no Court here would award her a Decree nor would they give her the care or control of the children at any time.

We further find upon speaking to the children, that none of them desire to see their mother again and would not live with her for five minutes. If we were to go into the merits of this case with you, we are of the opinion that you would have nothing further to do with it.

We feel however, that if this woman wants a decree, she ought to have one which would be good in any part of the United States or elsewhere. She can only obtain it however, by amending her complaint as suggested by us, for if she comes here, it will be a case of inviting trouble for herself.

We might add that there is nothing in this matter for us as we are only writing on behalf of the defendant as a matter of friendship, and the plaintiff can elect which course she will pursue, and if she elects to adopt that stated in our letter of the 16th inst., we will advise the defendant accordingly.

Very respectfully yours,

McK:W.



November 8, 1917.

Mrs. Margaret [REDACTED]

San Francisco, Calif.

Dear Mrs. [REDACTED]:

Replying to your letter, we enclose herewith a communication received from your husband's attorneys, which is self-explanatory.

We have no recommendation to make in the matter, because it is one entirely for your own determination. As soon as we hear from you we will take it up with the attorneys again. Please return their letter when you write.

Hoping you are having a pleasant visit,

Sincerely,

November 10, 1917.

Mrs. Margaret [redacted]
Chancellor [redacted],
San Francisco, Calif.

Dear Mrs. [redacted]:

Replying to yours of the 7th, there is no objection to your forwarding the letter from your husband's attorneys to your people. However, I think it would shorten matters if you would return it to me with such instructions as you wish me to follow, and I could write to the attorneys at once. You could make a copy of the letter for your own purposes.

With kind regards,

Sincerely,

Dec. 5, 1917.

Mr. Charles Horowitz,
2460 Seventh Avenue,
New York, N.Y.

Dear Sir:

Please find herewith your Affidavit of Service of Summons in the case of Margaret C. [REDACTED] vs. John Lloyd [REDACTED], pending in the Second Judicial District Court of the State of Nevada, in and for the county of Washoe.

We would thank you to take the affidavit to the Notary Public before whom you swore to said affidavit, viz. Morris Schneider, and have him impress thereon his notarial seal, which we note was omitted by him. When this is done, be good enough to return the affidavit to us.

Trusting that this matter will have your prompt attention we are

Very truly yours,

WOODBURN & BARTLETT,

By

December 5, 1917.

McKnight & Steinbeck, Esqrs.,
81 East 125th Street,
New York, N.Y.

Gentlemen:

FOR ATTENTION OF MR. MC KNIGHT.

we have

In re. [redacted] we have to inform you that taken up for final consideration with our client, Mrs. Margaret [redacted], the matter of your suggestion of October 16th, relative to striking from the complaint that part thereof upon the last page of the complaint beginning at line seven and ending at line seventeen, which part refers particularly to the demand of plaintiff for the care, custody and control of two of the minor children, and the requirement that plaintiff ^{defendant} pay for the support of said children the sum of \$25 per month each, until the further order of the court, and for a reasonable attorney's fee to be allowed plaintiff in the action, together with costs of suit.

It is, of course, desirable that the decree when granted shall be given full credit in New York, as well as elsewhere, and we are, therefore, very desirous that an appearance by attorney be made on the part of the defendant.

Mrs. [redacted] has finally decided to authorize us and we do by this letter specifically agree to abandon the said part of the prayer of the complaint referred to in your said letter of October 16th, 1917, and hereinabove specified, and assure you that no such demand will be made at the hearing and to further inform you as a matter of fact that our Reno courts refuse to exercise jurisdiction over the question of custody and maintenance of minor children where the children are not actually within the jurisdiction of the court; consequently, the court would, of its own motion, refuse to entertain the demand as made in the prayer; and we do, as we said above, agree to relieve the defendant of all demands for attorney's fees.

Therefore, kindly select your attorney here to represent the defendant, to whom you may send a copy of this letter, which we enclose for your convenience.

Should you not be acquainted with the lawyers here, we suggest the names of the following, to whom you might write: Worcester and Thatcher, the former until recently

No. 2.

a Chief Justice of the Supreme Court of this state, and at present associated with Mr. Thatcher, who is the Attorney General of Nevada; also James T. Boyd, Attorney for the Scheeline Banking & Trust Co. of this city. These attorneys are all gentlemen of high standing at the Bar, and your interests would be in safe hands.

Appreciating an early reply, we are

Respectfully yours,

WOODBURN & BARTIETT,

By

MCKNIGHT & STEINBOCK
ATTORNEYS AND COUNSELORS AT LAW
81 EAST 125TH STREET
CORN EXCHANGE BANK BUILDING
NEW YORK

In Re:-

[REDACTED]

DECEMBER
THIRTEENTH
1917

Woodburn & Bartlett, Esqs.,
Reno, Nev.

Gentlemen:-

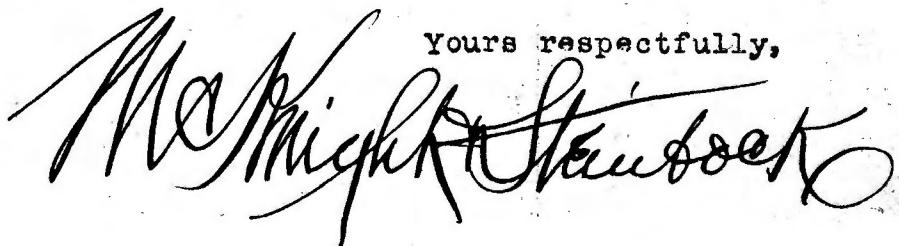
We are in receipt of your favor of the 25th inst. in relation to the above entitled matter, and upon receipt of your letter, we sent for our client and have just had an interview with him.

We have explained to him the advantages of divorce being good all over the world, its effect upon his future and those of his children, and have advised him that, in our judgment, it is right and proper that an attorney in Nevada should be retained to protect his interests.

We thank you very much for the information respecting reputable attorneys in your City, and will, no doubt, retain one of the gentlemen named. The defendant, however, is not in a financial condition to retain an attorney, and has so advised us. He further states that he may be able to pay a small fee about the first of the coming year, but his present employment is such that it takes all he earns to keep his family.

We will take the matter up with him again in a few days, and then let you hear from us.

Yours respectfully,



TWMCK.

1 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE
2 OF NEVADA, IN AND FOR THE COUNTY OF WASHOE.

3
4 MARGARET G. [REDACTED],
5 Plaintiff,
6 vs.
7 JOHN LLOYD [REDACTED],
8 Defendant.

COMPLAINT.

9
10 Plaintiff complains of defendant, and
11 for cause of action alleges:

12 I.

13 That for more than six months next immedi-
14 ately preceding the commencement of this action, plain-
15 tiff has been, and now is, an actual bona fide resident
16 of the city of Reno, Washoe county, state of Nevada.

17 II.

18 That plaintiff and defendant intermarried
19 at New York city, state of New York, on the 3rd day of
20 November, 1904, and ever since have been, and now are,
21 husband and wife.

22 III.

23 That there are three children of plain-
24 tiff and defendant, issue of said marriage, namely: John
25 Lloyd [REDACTED], aged twelve years, Margaret Alice [REDACTED]
26 [REDACTED], aged ten years, and George Robert [REDACTED], aged seven
27 years.

28 IV.

29 That there is no community property of
30 plaintiff and defendant.

31 V.

32 That since said marriage, defendant has

1 treated her, the plaintiff, with extreme cruelty, and
2 in an inhuman and brutal manner, in particular as follows:

3 That about one year after the marriage of plain-
4 tiff and defendant, defendant developed a persistently
5 nagging and irritable temper, complaining at plaintiff
6 constantly about minor household matters and conditions,
7 irritably throwing dishes around and manifesting such
8 irritability of temper, continuously and in particular
9 in the following instances:

10 About the month of June, 1908, defendant, in
11 a fit of violent temper, without cause of provocation,
12 violently struck plaintiff on the hip, causing a pain-
13 ful bruise, and cursed plaintiff, calling her vile
14 and opprobrious names and using vile and vulgar language;
15 about the month of July, 1908, and a short time prior
16 to the birth of said George Robert [REDACTED], minor child
17 of plaintiff and defendant, defendant in a violent fit
18 of temper, without cause of justification, again using
19 vile and vulgar language and cursing plaintiff, threw a
20 handbag at plaintiff; shortly after which incident,
21 during another outburst of temper, said defendant threw
22 his shoes at plaintiff, which struck plaintiff, caus-
23 ing a severe and painful bruising of her instep and ankle;
24 during the years 1913 and 1914 defendant, on frequent
25 occasions, brutally pinched, struck and pushed plain-
26 tiff, and cursed her, using vile, abusive and vulgar
27 language; on or about the 26th of April, 1915, defend-
28 ant in a violent and bitter quarrel, unjustly and with-
29 out cause, charged plaintiff with associating with other
30 men, and charged her with being in love with another
31 man, and abused plaintiff, swearing at her, cursing her
32 and her mother, and all of her relatives, grabbed her

1 violently and dragged her downstairs, and tore her
2 clothes; defendant continued the same character of abuse
3 last alleged during the month of May immediately follow-
4 ing, and on the public streets of New York City grabbed
5 plaintiff by the neck and dragged her across the street,
6 cursing her and unjustly and without cause or provoca-
7 tion charging her with running around with other men;
8 in the month of June immediately following, defendant
9 again followed plaintiff on the street, cursed her,
10 charged her, without any cause or provocation of being
11 intimate with other men, all in the hearing and presence
12 of strangers on the public sidewalk, and again made the
13 same unjust and unwarranted accusations in the month of
14 September of said year;

15 That in said month of June, above referred to,
16 defendant was arrested for the assault upon her herein-
17 above alleged, and only the persuasions of plaintiff
18 prevented the court from sending defendant to jail for
19 a period of six months, plaintiff having earnestly en-
20 treated the court not to sentence her husband because
21 of her dire necessities in the support of herself and
22 the children of plaintiff and defendant;

23 That the treatment of plaintiff by defendant
24 last above alleged, caused plaintiff not only deep humil-
25 iation and mortification and mental suffering, but keen
26 physical suffering, which so seriously impaired her
27 health that she was under the care of a physician for a
28 number of months;

29 That said treatment made it impossible and dan-
30 gerous for plaintiff to live with defendant as his wife;

31 All of which cruel, brutal and inhuman treat-
32 ment of plaintiff by defendant has been without cause
or provocation of any kind, nature or character on the

1 part of plaintiff.

2 WHEREFORE, plaintiff demands judgment and de-
3 crec of this Honorable Court that the bonds of matri-
4 meny now and heretofore existing between plaintiff and
5 defendant be forever and completely dissolved, and that
6 each party herete be freed and released from all the re-
7 sponsibilities and obligations thereof; that plaintiff
8 be awarded the sole custody, care and control of two of
9 the said minor children, namely, Margaret Alice [redacted],
10 aged ten years, and George Robert [redacted], aged seven
11 years, and that defendant be required to pay to plaintiff
12 for the support and maintenance of said children the
13 sum of Twenty-five dollars (\$25.) each per month, or a
14 total of Fifty (\$50.) dollars per month, until the fur-
15 ther order of this Honorable Court; that a reasonable at-
16 terney's fee be allowed plaintiff in this action, to-
17 gether with her costs of suit, and for such other and
18 further relief as to this Honorable Court may seem meet
19 and proper in the premises.

21
Attorneys for Plaintiff.

22 State of Nevada }
23 County of Washoe } SS:

24 MARGARET G. [redacted], being first duly sworn,
25 deposes and says: That she is the plaintiff in the above-
26 entitled action; that she has read the foregoing Complaint
27 and knows the content thereof, and that the same is true
28 of her own knowledge, except as to those matters therein
29 alleged on information and belief, and as to such mat-
30 ters she believes it to be true.

31
32 Subscribed and sworn to before me
this _____ day of October, 1917.

Notary Public in and for the County
of Washoe, state of Nevada.

No. *12888* Dept. No. *1*

IN THE SECOND JUDICIAL DISTRICT
COURT OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF WASHOE.

MARGARET G. [REDACTED],
Plaintiff

VS

JOHN LLOYD [REDACTED],
Defendant

A N S W E R

*Filed this 12th day of
March 1918
Beaman
Clerk*

IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA,
IN AND FOR THE COUNTY OF WASHOE.

=====

MARGARET G. [REDACTED],	.	
Plaintiff,	.	
	.	
vs	.	A N S W E R .
	.	
JOHN LLOYD [REDACTED],	.	
Defendant.	.	
	.	
.....	.	

The defendant answering the complaint

I

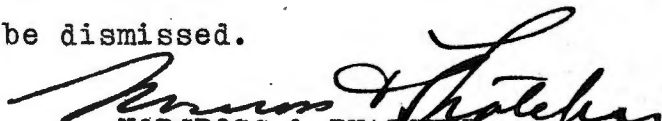
Admits the allegations in said complaint contained
in the paragraphs thereof numbered I, II, III, and IV.

II

Denies each and every allegation contained in
paragraph of said complaint numbered V.

III

WHEREFORE, defendant demands judgment that the
complaint of the plaintiff be dismissed.


NORCROSS & THATCHER,

Attorneys for Defendant.

CITY OF NEW YORK,)
) SS
COUNTY OF NEW YORK.)

 JOHN LLOYD [REDACTED] being first duly sworn, deposes
and says, that he is the defendant in the above entitled action;
that he has read the foregoing Answer and knows the contents
thereof, and that the same is true of his own knowledge except
as to those matters therein alleged on information and belief,
and as to those matters he believes it to be true.

JOHN L. [REDACTED].

Subscribed and sworn to before me
this 6th day of March, 1918.

Matilda Weinstein, Commissioner of Deeds, New York City, Residing
in New York County. Term expires Sept. 18th, 1919. N.Y. County
clerks No. 205. N.Y. Registers No. 19077.

1 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA,
2 IN AND FOR THE COUNTY OF WASHOE.

3 -----X
4 MARGARET G. [REDACTED], PLAINTIFF. 0
5 --VS-- 0
6 JOHN LLOYD [REDACTED], DEFENDANT. 0
7 -----X

8
9 DECREE OF DIVORCE.

10
11 This cause having been brought on regularly for trial
12 on the 19th day of March, 1918, upon the complaint of the
13 plaintiff and the answer of the defendant, plaintiff appear-
14 ing in person and being represented by her attorneys, Wood-
15 burn & Bartlett, Esqrs., and the defendant being represent-
16 ed by his attorneys, Norcross & Thatcher, Esqrs., and the
17 Court having heard the testimony in said case and having
18 duly considered the same, and made and filed its Findings of
19 Fact and Conclusions of Law, from which it appears that all
20 the allegations of extreme cruelty alleged by plaintiff
21 against the defendant are true, and sustained by proof free
22 from all legal exceptions as to competency, admissibility
23 and sufficiency, as are also all allegations of the com-
24 plaint relative to the residence of plaintiff, marriage of
25 plaintiff and defendant, issue of said marriage, to wit;
26 three children, namely: John Lloyd [REDACTED], aged twelve
27 years, Margaret Alice [REDACTED], aged ten years, and George
28 Robert [REDACTED], aged seven years, all residing with defendant
29 at this time in the State of New York, and all other matters
30 in said complaint alleged; that said matters so alleged and
proved in behalf of plaintiff are sufficient in law to

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entitle plaintiff to the relief prayed for in her complaint;

IT IS ORDERED, ADJUDGED AND DECREED, and the Court,
by virtue of the power and authority therein vested and
in pursuance of the statute in such case made and provided
does

ORDER, ADJUDGE AND DECREE, that the marriage between said plaintiff, Margaret G. [REDACTED], and the said defendant, John Lloyd [REDACTED], be dissolved, and the same is hereby dissolved accordingly, and the parties are, and each of them is freed and absolutely released from the bonds of matrimony and all the obligations and responsibilities thereof.

DONE IN OPEN COURT this 19th day of March, 1918.

DISTRICT JUDGE.