

IN THE SUPREME COURT OF ALBERTA  
Judicial District of Calgary



B e t w e e n,-

KTHEL VIVIAN INGHAM,  
-and- -Plaintiff  
THOMAS POTTER INGHAM  
-Defendant

-----STATEMENT OF CLAIM-----

1. The Plaintiff is a married woman residing in the City of Calgary, and the Defendant is the lawful husband of the Plaintiff and is in the employment of the Canadian Pacific Railroad Company, and resides in the City of Calgary.

2. On or about the 30th day of March A. D. 1910, the Plaintiff married the Defendant in the said City of Calgary, and there have been no children born, the issue of the said marriage.

3. Both the Plaintiff and Defendant since the said marriage have been domiciled in the Province of Alberta.

4. During the latter part of the year 1914, or the beginning of the year 1915, the Defendant contracted a venereal disease from a woman whose name is unknown and the Defendant had not recovered from the said disease on or about the 27th day of November, 1915, when the Plaintiff was compelled to leave him as hereinafter alleged.

5. One evening during the first part of November, 1915, the Defendant assaulted the Plaintiff by hitting her upon the neck with his clenched fist, knocking her over a chair and causing her severe bodily pain and injury.

6. During the period from the time the Defendant contracted the said venereal disease until the said 27th day of November, 1915, the Defendant neglected to take the proper treatment and care of himself in order to effect a cure of the said disease and was accustomed to stay out late at night and very frequently till 2 and 3 o'clock in the morning; and although often requested by the Plaintiff to take better care of himself, lead a better life and pay more attention to his home, the Defendant scorned the Plaintiff's requests and refused and neglected to comply with her wishes, and neglected to take the proper care of himself; so that the Plaintiff despaired of the Defendant's ever being cured of the said disease and of ever being able to live safely and happily with him.

7. In consequence of the aforesaid, the Plaintiff was compelled to live separate and apart from her said husband since the said 27th day of November, 1915 .

8. The Plaintiff further alleges that on each and every day from the 17th day of December, until the 31st day of December, 1918 and on each and every day from the first day of January, until the 15th day of January, 1919, in suite No. 301, Alberta Loan Building or in some other suite of rooms in said Alberta Loan Building, in the City of Calgary, in the Province of Alberta, the Defendant did commit adultery with a certain woman by the name of Selma Bronken, during which said periods the said Defendant lived and cohabited with the said Selma Bronken in such a manner as if said parties were man and wife.

9. Since on or about the 1st day of January, 1919, until the present time, the Plaintiff has not cohabited with the Defendant.

10. Since on or about the said 27th day of November, 1915, until the present time, the Plaintiff has received but very little financial support from her husband, and she has been compelled to work for her own livelihood and support.

Therefore, the Plaintiff asks, -

- (1) That the said marriage between the said Plaintiff and the Defendant be dissolved  
Or, in the alternative,
- (2) A judicial separation between the Plaintiff and the Defendant.
- (3) Such other and further relief as to this Court may seem just and equitable.
- (4) The costs of this action.

DATED at Calgary, in the Province of Alberta, this 25<sup>th</sup> day of February, A.D. 1919, and delivered by J. J. McDonald, Solicitor for the above named Plaintiff, whose address for service is at the office of the said Solicitor, Rooms 8-9 Cameron Block, Calgary, Alberta.

Issued at the Supreme Court of Alberta, Judicial District of Calgary, this 25<sup>th</sup> day of February, A.D. 1919.

*Laurie C. Blain*  
Clerk of the Court.