

26  
IN THE  
CIRCUIT COURT OF  
BALTIMORE CITY

LOYSE TRIGG

*B 138*  
*1934*

VS.

FRANK TRIGG.

BILL OF COMPLAINT

*B 38707*  
*(1)*

Mr. Clerk:

Please file, etc.

*Thurgood Marshall*  
Solicitor

*FD 22 March 1934*

LAW OFFICES  
THURGOOD MARSHALL  
604 Phoenix Bldg.

LOYSE TRIGG     ()     trix may be divor IN THE     this matrimonial from the  
 defendant.     ()     CIRCUIT COURT  
 vs.

FRANK TRIGG     ()     and permanent BALTIMORE CITY

To the Honorable, the Judge of said Court:

The bill of complaint of your oratrix respectfully  
 represents unto your Honor as follows:

1. That your oratrix was married to the defendant on the twelfth day of January 1929 at Elkton Maryland by a duly ordained minister of the Gospel.
2. That the defendant resides in Baltimore City and has been a resident of the State of Maryland for more than two years last past.
3. That one child, Zenaide Trigg, was born as a result of said marriage.
4. That on or about the first day of September 1930, the defendant without just cause or provocation deserted and abandoned your oratrix; that said abandonment has continued uninterruptedly since that date, was the defendant's own deliberate and final act, and is beyond any reasonable hope or expectation of a reconciliation.
5. That the conduct of your oratrix towards her husband has always been kind, affectionate and above reproach.
6. That the defendant is employed but your oratrix is unable to state the amount of his earnings, whereas your oratrix is without means of support or of maintaining these proceedings.

DOCKET ..... B 138/1934 .....

IN THE CIRCUIT COURT .....

LOYSE TRIGG

vs.

FRANK TRIGG

ADDITIONAL  
DEPOSITIONS

*B* No. *38707*  
*187*

PLAINTIFF'S COSTS

Examiner ..... \$.....  
Copies .....  
Notices .....  
Sheriff .....  
Stenographer .....

\$

DEFENDANT'S COSTS

Examiner ..... \$.....  
Copies .....  
Notices .....  
Sheriff .....  
Stenographer .....

\$

GERALD W. HILL, Examiner

Filed *5* day of *July* 19 *46*



LOYSE TRIGG

vs.

FRANK TRIGG

In the Circuit Court  
OF BALTIMORE CITY

~~A Decree Pro Confesso~~ having been passed, testimony taken,  
the case referred to the Master,

and notice having been given me by the Solicitor for the Plaintiff

of a desire to take <sup>additional</sup> testimony in the same, I, GERALD W. HILL,

Examiner 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~~

..... day of ....., 19....., met on

the 4th day of February in the year nineteen

hundred and forty-six, at my office, in the City of Baltimore, in the

State of Maryland, and assigned the 4th day of February

in the same year at 11:15 o'clock in the fore-noon and the

office of The Examiner in the City and State

abovesaid, 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 deposition, that

is to say:



TESTIMONY taken before Gerald W. Hill, Examiner, on  
Monday, February 4th, 1946, at 11:15 a.m.

Present: Robert P. McGuinn - counsel for plaintiff.

Thereupon:

LOYSE TRIGG,

the plaintiff, heretofore produced, sworn and examined  
as a witness on her own behalf, being now recalled for  
further examination and resworn, deposeth and saith as  
follows, that is to say:

BY MR. MCGUINN:

Q. Mrs. Trigg, you gave testimony in this case on or  
about September 14th, 1934?

A. Yes.

Q. And you now wish to reaffirm that testimony?

A. I do.

Q. Has your status remained the same as of the date of  
the taking of testimony?

A. Yes, it has.

Q. In other words, you have not cohabited with him?

A. No.

Q. Nor has there been any reconciliation between you and  
your husband?

A. No.

Q. Will you state your reason for having delayed in prosecuting this case?

A. I understood that he might be interested in a reconciliation and I thought at the time that perhaps for the sake of the child I might give consideration to such an arrangement but I found out he obviously was not interested, and it never materialized, and I felt that I might as well continue the action.

Q. Do you know or can you state whether or not your husband is in the military service of the United States or any of its allies?

A. No, he is not.

Q. Has he been ordered to report for induction under the Selective Training and Service Act of 1940, as amended?

A. No.

Q. Is he a member of the Enlisted Reserve Corps who has been ordered to report for military service?

A. No.

-----

QUESTION BY THE EXAMINER:

Do you know or can you state any other matter or thing that may be of benefit or advantage to the parties to this suit or either of them or that may be material to the subject of this your examination or the matter in question between the parties? If so, state same fully and at large in your answer.

Answer No.

Signature Loyse T. King



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.....5th..... day of February..... in the year of our Lord nineteen hundred and forty-six....., at the City of Baltimore, in the State of Maryland.

G. Hill



Examiner.

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There are.....no..... Exhibits with these depositions, to wit:  
Plaintiff's .....Exhibit.....

Defendant's .....Exhibit.....

G. Hill

Examiner.

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I, GERALD W. HILL, 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.....

G. Hill

Examiner.

DOCKET B. 138/1934

IN THE CIRCUIT COURT

Loyse Trigg

vs.

Frank Trigg

**DEPOSITIONS**

B No. 38707

**PLAINTIFF'S COSTS**

Examiner .....	\$.....
Copies .....	.....
Notices .....	.....
Sheriff .....	.....
Stenographer .....	.....

\$

**DEFENDANT'S COSTS**

Examiner .....	\$.....
Copies .....	.....
Notices .....	.....
Sheriff .....	.....
Stenographer .....	.....

\$

**GEORGE ARNOLD FRICK, Examiner**

Filed 14 day of Sept 1934

.....  
Loyse Trigg  
.....

vs.

Frank Trigg  
.....  
.....

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

.....  
A Decree Pro Confesso having been passed - - - - -

and notice having been given me by the Solicitor for the Plaintiff - - - - -

of a desire to take testimony in the same, I, GEORGE ARNOLD FRICK, 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

..... 29th ..... day of August ....., 1934, met on

the ..... 11th ..... day of September ..... in the year nineteen

hundred and thirty-four....., at my office, in the City of Baltimore, in the

State of Maryland, and assigned the ..... 13th ..... day of September .....

in the same year at ..... eleven ..... o'clock in the ..... fore ..... noon and the

office of ..... the Examiner ..... 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 deposition, that

is to say:



TESTIMONY taken at the office of George Arnold Frick, Examiner, on Thursday, September 13, 1934, at eleven o'clock in the morning.

Present: Thurgood Marshall, Counsel for the Plaintiff.

Thereupon:

LOYSE TRIGG, the Plaintiff, produced as a witness on her own behalf, being first duly sworn according to law, deposeth and saith as follows - that is to say -

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Loyse Trigg, 201 W. 22nd Street, New York City, N.Y. Saleslady.

2 Q- You are the Plaintiff in this proceeding?

A- Yes.

3 Q- How long have you known the Defendant, Frank Trigg?

A- About six years.

BY MR. MARSHALL:

4 Q- Has your husband been a resident of the City of Baltimore and the State of Maryland for more than two years

Loyse Trigg

prior to the filing of your suit?

A- Yes.

5 Q- When, where and by whom were you married?

A- Elkton, Maryland, January 12, 1929, by Reverend  
Robinson.

6 Q- Is he a minister of the Gospel?

A- Yes.

7 Q- Were there any children born as the result of  
your marriage?

A- Yes.

8 Q- How many?

A- One.

9 Q- Girl or boy?

A- Girl.

10 Q- What is her name and age?

A- Zenaide Trigg, four years old.

11 Q- Have you the care and custody of this child at the  
present time?

A- Yes.

12 Q- Do you wish to continue to have the care and custody  
of this child?

A- Yes.

13 Q- Have you always been a kind, chaste and affection-  
ate wife towards your husband?

Loyse Trigg

A- Yes.

14 Q- Are you living together now?

A- No.

15 Q- When did you separate?

A- September, 1930.

16 Q- Which one left the other?

A- He left.

17 Q- Did you give him any just cause to leave you?

A- No.

18 Q- Was his desertion and abandonment of you his deliberate and final act?

A- Yes.

19 Q- Has this separation continued uninterruptedly for more than three years prior to the filing of your suit?

A- Yes.

20 Q- Is there any hope or expectation of a reconciliation between you and your husband?

A- No.

21 Q- Is your husband a resident of the State of Maryland?

A- Yes.

MR. MARSHALL: That's all.

-----



QUESTION BY THE EXAMINER:

Do you know or can you state any other matter or thing that may be of benefit or advantage to 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.

Answer:

*No.*  
*Loyse Trigg*

VONDELEAR MALE HAGGINS, produced as a witness on behalf of the Plaintiff, being first duly sworn according to law, deposeth and saith as follows - that is to say

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Vondelear Male Haggins, 515 Robert Street, Baltimore, Maryland. House wife.

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

A- Yes.

3 Q- How long have you known them?

A- I have known them for about eight years.

4 Q- Both of them?

A- I have known Mr. Trigg for about ten years.

BY MR. MARSHALL:

5 Q- Were you present at the wedding?

A- No, I was not.

6 Q- Did Mr. and Mrs. Trigg live together as man and wife and hold themselves out in the community in which they lived and were they so treated by their friends, relatives and acquaintances?

A- Yes.

7 Q- Has Mr. Trigg been a resident of the City of Baltimore and the State of Maryland for more than two

Vondelear Male Haggins

years prior to the filing of this suit?

A- Yes.

8 Q- Were any children born as the result of this marriage?

A- Yes.

9 Q- How many?

A- One.

10 Q- Girl or boy?

A- Girl.

11 Q- What is her name and age?

A- Zenaide Trigg, four years old.

12 Q- Who has the care and custody of this child now?

A- Mrs. Trigg.

13 Q- Is she a fit and proper person to have the care and custody of this child?

A- Yes.

14 Q- Was Mrs. Trigg always a kind, chaste and affectionate wife towards her husband?

A- Yes.

15 Q- Are they living together now?

A- No.

16 Q- When did they separate?

A- In September, 1930.

17 Q- Which one left the other?



Vondelear Male Haggins

A- Mr. Trigg.

18 Q- Do you know whether she gave him any just cause or reason to leave her?

A- No.

19 Q- Was the Defendant's desertion of her/<sup>his</sup> deliberate and final act?

A- Yes.

20 Q- Has the separation continued uninterruptedly for more than three years prior to the filing of this suit?

A- Yes.

21 Q- Do you think there is any hope of a reconciliation between them?

A- No.

22 Q- Is Mr. Trigg a resident of the State of Maryland?

A- Yes.

MR. MARSHALL: That's all.

QUESTION BY THE EXAMINER:

Do you know or can you state any other matter or thing that may be of benefit or advantage to 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.

Answer: *No.*

*Vondelcar Male Haggins.*

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.....**14th**.....day of **September**.....in the year of our Lord nineteen hundred and thirty.....**four**....., at the City of Baltimore, in the State of Maryland.

*George Arnold Frick*  
**SEAL**

Examiner.

There are **no**.....Exhibits with these depositions, to wit:

Plaintiff's .....Exhibit.....

Defendant's .....Exhibit.....

*George Arnold Frick*  
Examiner.

I, GEORGE ARNOLD FRICK, 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.....

*George Arnold Frick*  
Examiner.

Circuit Court

*B138*

1934

Docket No. 74B, 138

LOYSE TRIGG

vs.

FRANK TRIGG

Decree Pro Confesso

*Frick*

~~1934~~

No. B ~~38707~~

*B 38707*

*(5)*

Filed 29 day of Aug, 1934

[DECREE PRO CONFESSO]

LOYSE TRIGG

vs.

FRANK TRIGG

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

Term, 1934

The Defendant Frank Trigg 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 29th day of August in the year nineteen hundred and thirty-four 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 Frank Trigg

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 F. Stanton*



*J 876*

Ct. Ct.

B-138

19 34

No.

Docket

Loyse Trigg

vs.

Frank Trigg

*8/9/34*

Cal. 6246

*1119 Lawvale*

**SUBPOENA TO ANSWER BILL OF COMPLAINT**

*Pro. Bofe*

No. B-38707

(2) (3) (4)

*In Washington*

Filed	<i>9<sup>th</sup> April</i>	19	<i>34</i>
	<i>14 May</i>		<i>1934</i>
	<i>13 Aug</i>		<i>1934</i>

Thurgood Marshall

Solicitor

*13*

EQUITY SUBPOENA

The State of Maryland

To Frank Trigg,

1119 W. Lanvale Street

B-138-1934

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

Loyse Trigg

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 SAMUEL K. DENNIS, Chief Judge of the Supreme Bench of Baltimore City, the 12th day of March, 19 34  
Issued the 22nd day of March, in the year 19 34.

*Chas. 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.

(General Equity Rules 11)

Now Est  
Swoboda

Joseph C. Deegan  
Sheriff

4/9 34

ISSUED TO

May  
Chas R Whiteford

Joseph C. Deegan  
Sheriff

Now Est  
Swoboda

8/9 1934

REISSUED TO

August  
Chas R Whiteford  
Clerk

Summoned Frank Trigg and a copy of the Process  
with a copy of the Bill of Complaint served on the  
defendant on the 9<sup>th</sup> day of August 1934 in the presence  
of Melvin V. Swoboda

Joseph C. Deegan  
Sheriff

Geo A. / 70

Defendant is not at  
address given.  
Attorney has been  
notified by mail.

Date 3/27/34

RECEIVED AT THE SHERIFF'S OFFICE  
MAR 27 1934

# Circuit Court

138  
1934

Docket No. B

LOYSE TRIGG

vs.

FRANK TRIGG

## ORDER OF APPEARANCE

(38707)

B No. ~~38707~~  
(7)

Filed

V. February

19

46



LOYSE TRIGG

vs.

FRANK TRIGG

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

Mr. Clerk:

Enter my appearance for the Plaintiff  
~~Strike out~~



Robert P. McGuin Solicitor for Plaintiff

# Circuit Court

138  
1934

DOCKET No. 74B

Lopez Trigg

vs.

Frank Trigg

## Order of Reference and Report

Lattin

B No. 38707

{97

Order Filed 25<sup>th</sup> day of Feb, 1946

Report Filed 1<sup>st</sup> day of March, 1946

*Loye Trigg*

vs.

*Frank Trigg*

IN THE  
CIRCUIT COURT

OF  
BALTIMORE CITY

This case being submitted, without argument, it is ordered by the Court, this 25th  
day of February, 1946, that the same be and it is hereby referred to  
James A. Latane, Esq., Auditor and Master, to report the  
pleadings and the facts, and his opinion thereon.

*Henry J. Pappinger*  
Clerk

**Report of Auditor and Master**

Bill for divorce a vinculo matrimonii, for the custody of the minor  
child of the parties, for permanent alimony, filed by the wife against  
her husband on the ground of abandonment. Code, Art. 16, Sec. 38-45.

Defendant summoned.

Defendant's residence in Baltimore City for more than two years  
proven.

The marriage proven.

The abandonment for three years, its finality and the irrecon-  
cilability of the parties proven.

Case made for giving the custody of said child to the plaintiff.

In additional testimony, taken February 4, 1946, plaintiff explains  
the delay in this case as due to a hope of bringing about a reconciliation,  
but that the defendant has shown no desire for a reconciliation and that  
there has been no change in the status of the parties since the last  
taking of testimony.

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

Testimony dated February 4, 1946, re non-military status of defendant,  
has been filed.

February 28, 1946.

*James A. Latane*

Auditor and Master

11 on  
made

# CIRCUIT COURT

B 138  
1934

No. Docket

LOYSE TRIGG

VS.

FRANK TRIGG

Recorded

Folio 22119 46

Decree of Divorce

B No. 38707  
[107]

Ed 2 March 1946

DECREE OF DIVORCE.

LOYSE TRIGG

vs.

FRANK TRIGG

IN THE

CIRCUIT COURT

—OF—

BALTIMORE CITY

*January* TERM, 19 *46*

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

It is Thereupon, This *2<sup>nd</sup>* day of *March*, A. D. 19 *46*,

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

the above named Complainant, be and she is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, Frank Trigg

And it is further ordered that the said complainant shall have the guardianship and custody of Zenaide Trigg, the minor child of the parties in the proceedings mentioned, and that the said defendant shall be chargeable with its maintenance and support, subject to the further order of this Court in the premises.

And it is Further Ordered, That the said Frank Trigg  
pay the cost of this proceeding.

*Michael J. Manley*



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

*Jas. A. Lavane*

*Auditor and Master*