

DOCKET B. 30/1935

IN THE CIRCUIT COURT No. 2

Willie Mae McGuinn

vs.

Robert P. McGuinn

DEPOSITIONS
UNDER CROSS BILL.

No. 36776 B
287

PLAINTIFF'S COSTS

Examiner	\$
Copies
Notices
Sheriff
Stenographer

	\$

DEFENDANT'S COSTS

Examiner	\$
Copies
Notices
Sheriff
Stenographer

	\$

GEORGE ARNOLD FRICK, Examiner

Filed 27 day of April 1935

Willie Mae McGuinn

vs.

Robert P. McGuinn

In the Circuit Court No. 2
OF BALTIMORE CITY

The above entitled cause being at issue,

and notice having been given me by the Solicitor for the Plaintiff in Cross Bill 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 8th day of April, 1935, met on the 12th day of April in the year nineteen hundred and thirty-five, at my office, in the City of Baltimore, in the State of Maryland, and assigned the 13th day of April in the same year at ten 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^s of the respective parties to take the following deposition, that is to say:

TESTIMONY taken at the office of George Arnold Frick, Examiner, on Saturday, April 13, 1935, at ten o'clock in the morning.

Present: Thurgood Marshall, Counsel for the Plaintiff.
E. Everett Lane, Counsel for the Defendant.

Thereupon:

WILLIE MAE McGUINN, the Plaintiff, produced as a witness on her own behalf, being first duly sworn according to law, deposes and saith as follows - that is to say -

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Willie Mae McGuinn, 1404 Madison Avenue, Baltimore, Maryland.

2 Q- What is your occupation?

A- House keeper.

3 Q- You are the Plaintiff in this proceeding?

A- Yes, sir.

4 Q- How long have you known the Defendant, Robert P. McGuinn?

Willie Mae McGuinn,

A- I have known him since 1913.

BY MR. MARSHALL:

5 Q- Mrs. McGuinn, have you been a resident of the City of Baltimore and the State of Maryland for more than two years prior to the filing of this suit?

A- Yes.

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

A- I was married in New York, by a Justice of the Peace where you get the marriage license.

7 Q- What year was that?

A- It was 1925, October 6.

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

A- Yes, two.

9 Q- Names and ages?

A- Ruth, nine; and Roberta, three.

10 Q- Have you the care and custody of these children at the present time?

A- Yes.

11 Q- Have you always been a kind, chaste and affectionate wife towards your husband?

A- Yes.

Willie Mae McGuinn

12 Q- Are you living together now?

A- No.

13 Q- When did you separate?

A- 1932, January.

14 Q- Which one left the other?

A- He left me.

15 Q- Did you give him any just cause or provocation to leave you?

A- No.

16 Q- What did he say when he left you, if anything?

A- He said he wasn't going to live with me any more.

17 Q- Do you think that his desertion and abandonment of you was his final and deliberate act?

A- Yes.

18 Q- Is there any expectation of a reconciliation between you and your husband?

A- No.

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

A- Yes.

20 Q- Do you want the care and custody of your two children?

A- Yes.

21 Q- What do you consider a reasonable amount for the support and maintenance of the children in this case?

Willie Mae McGuinn

A- Well, I have agreed to accept, the least I could get along with now is fifty dollars a month, and as he makes more that is to be increased.

MR. MARSHALL : That's all.

CROSS EXAMINATION BY MR. LANE :

1 XQ- Mrs. McGuinn, do you have any objection to Mr. McGuinn seeing the children at any time?

A- No.

2 XQ- And should you be compelled to leave the City would you object for him to have the care and custody of the children for any short period of time and to visit him?

A- No, but that is not to interfere with their school.

3 XQ- Of course, that is not to interfere with their education?

A- Yes.

4 XQ- Do I understand that the money is to be paid monthly - is that the idea?

A- Every two weeks I would rather have it.

5 XQ- How do you want this money paid; direct to you or through the Probation Department?

A- Through the Probation Department.

6 XQ- And that is to begin as of the date of the decree?

A- Yes.

7 XQ- Of course, he is paying you something now each week?

Willie Mae McGuinn

A- Yes, he is paying regular now.

8 XQ- And that is to start as of the date of the decree?

A- Yes.

MR. LANE: That is 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.*

Willie Mae McQueen

SARAH COLLINS FERNANDIS, produced as a witness on behalf of the Plaintiff, being first duly sworn according to law, deposes and saith as follows - that is to say -

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Sarah Collins Fernandis, 1427 Madison Avenue, Baltimore, Maryland.

2 Q- What is your occupation?

A- Social Worker.

3 Q- Do you know the parties to this suit, Mr. and Mrs. McGuinn?

A- Yes.

4 Q- How long have you known them?

A- I have known Mrs. McGuinn for about five years.

5 Q- How long have you known him?

A- Just about the same time. I knew him by sight, just an acquaintance, no more.

BY MR. MARSHALL:

6 Q- Mrs. Fernandis, you were not present at the wedding?

A- No.

7 Q- Did Mr. and Mrs. McGuinn live together as man and wife and hold themselves out as such and were they so treated

Sarah Collins Fernandis

by their friends and acquaintances and relations?

A- Yes, sir.

8 Q- Has Mrs. McGuinn been a resident of the State of Maryland for more than two years prior to the filing of this suit?

A- Yes.

9 Q- Any children born as the result of this marriage?

A- Yes, two.

10 Q- Do you know their names and ages?

A- Yes, Ruth, nine; and Roberta, three.

11 Q- Who has the custody of these children now?

A- Their mother.

12 Q- Is she a fit and proper person to have the care and custody of these children?

A- Most certainly.

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

A- Absolutely so.

14 Q- Are they living together now?

A- No.

15 Q- When did they separate - about what year?

A- 1932, January.

16 Q- Which one left the other?

A- He left her.

17 Q- Did she give him any just cause or reason to leave

Sarah Collins Fernandis

her?

A- No.

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

A- Yes.

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

A- Yes.

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

A- No, I don't think so.

21 Q- Is she the proper person to have the care and custody of the children?

A- Yes.

MR. MARSHALL: That's all.

MR. LANE: Cross Examination Waived.

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.
Sarah Collins Howland's

DANETTE M. SMALL, 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- Danette M. Small, 624 N. Carrollton Avenue, Baltimore, Maryland.

2 Q- What is your occupation?

A- School teacher.

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

A- Yes.

4 Q- How long have you known them?

A- I have known Mr. McGuinn since 1929, and Mrs. McGuinn since 1928.

BY MR. MARSHALL:

5 Q- You were not present at the wedding, were you?

A- No.

6 Q- Did they live together as husband and wife and hold themselves out as such and were they so treated by their friends and relatives?

A- Yes.

7 Q- Has the Plaintiff been a resident of the City of

Danette M. Small

Baltimore and the State of Maryland for more than two years prior to the filing of this suit?

A- Yes, she has.

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

A- There are two.

9 Q- Names and ages, if you know?

A- Roberta three, and Ruth nine.

10 Q- Who has the care and custody of these children now?

A- Mrs. McGuinn.

11 Q- Do you think she is the fit and proper person to have the care and custody of those children?

A- I do.

12 Q- Has Mrs. McGuinn always been a kind, affectionate and chaste wife towards her husband?

A- She has.

13 Q- Are they living together now?

A- No.

14 Q- When did they separate?

A- January, 1932.

15 Q- Which one left the other?

A- Mr. McGuinn left Mrs. McGuinn.

16 Q- Did she give him any just cause or provocation for leaving her?

A- She did not.

17 Q- Was ^{his} deliberate and abandonment of her/deliberate

Danette M. Small

and final act?

A- It was.

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

A- Yes, it has.

19 Q- Do you think there is any reasonable hope or expectation of a reconciliation between the parties?

A- No.

MR. MARSHALL: That's all.

MR. LANE: Cross Examination Waived.


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.*

Lanette M. Small

No other witnesses being named or produced before me, I then at the request of the Solicitor^s of the respective parties closed the depositions taken in said cause, and now return them closed under my hand and seal on this 27th day of April in the year of our Lord nineteen hundred and thirty five, at the City of Baltimore, in the State of Maryland.

George Arnold Frick
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 in Cross Bill, of which I was employed by the plaintiff 1 and on none by the defendant.....

George Arnold Frick
Examiner.

44 B 30-1935

IN THE
CIRCUIT COURT
NO. 2
OF
BALTIMORE CITY

WILLIE MAE MCGUINN

VS

ROBERT P. MCGUINN

*Cross-bill of
Complaint*

Mr. Clerk:

Please file etc.

Thurgood Marshall

*No 36776 B.
L57*

THURGOOD MARSHALL
ATTORNEY AT LAW
604 PHOENIX BUILDING
BALTIMORE, MD.

FILED

11-March 1935

WILLIE MAE McGUINN is suit; was * IN THE final act of
the said Robert P. McGuinn and there is no reasonable hope or
expectation of a reconciliation. * CIRCUIT COURT NO. 2
vs

WHEREAS YOUR ORATRIX * OF
ROBERT P. McGUINN your Oratrix may * be divorced from the Defendant, Robert *****
BALTIMORE CITY matrimonii

To The Honorable, The Judge of Said Court:

Your Oratrix, Willie Mae McGuinn, complaining says:

FIRST: That heretofore, Robert P. McGuinn, the husband of your Oratrix, filed his Bill of Complaint against her in this Court alleging, among other things, that your oratrix had without just cause abandoned the said Robert P. McGuinn and that such abandonment had continued uninterruptedly for at least three years, and was deliberate and final, and the separation of the parties was beyond any reasonable expectation of reconciliation, and thereupon the said Robert P. McGuinn prayed that he might be divorced a vinculo matrimonii from your oratrix.

SECOND: That your oratrix has answered said bill of complaint and in her answer has shown that the said Robert P. McGuinn is not entitled to any relief in this Honorable Court, but, on the contrary thereof, your oratrix, of right and by the rules and practice of equity, ought to have relief in the premises, all of which matters will more fully appear by reference to said bill and answer.

THIRD: That although your Oratrix has at all times been a kind, chaste and affectionate wife toward her husband, Robert P. McGuinn, the said Robert P. McGuinn, on or about the 20th day of January, 1932, without just cause or provocation, deserted and abandoned your oratrix. That said abandonment and desertion has been continuous and uninterrupted for more than three years prior

to the filing of this suit; was the deliberate and final act of the said Robert P. McGuinn and there is no reasonable hope or expectation of a reconciliation.

WHEREFORE YOUR ORATRIX PRAYS:-

1. That your Oratrix may be divorced a vinculo matrimonii from the Defendant, Robert P. McGuinn.

2. That your Oratrix may be awarded the permanent custody of her two minor children, Ruth Servant McGuinn, 8 years of age and Robert Alexander McGuinn, 3 years and 6 months of age with a reasonable sum for their support and maintenance.

3. That your Oratrix may be awarded a reasonable sum as permanent alimony and a counsel fee for her solicitor of record.

4. That your Oratrix may be awarded such other and further relief as her case may require.

And as in duty bound, etc.

Thurgood Marshall
Solicitor for Plaintiff.

Service admitted this 11th day of March, 1935.

E. Everett Lane
Solicitor for Respondent in x^hel

Cir. Ct. No. 2.

~~1925~~

Docket No. 42B
30

Willie Mae McGuinn

vs.

Robert P. McGuinn

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file,

Thurgood Marshall

Solicitor for Plaintiff.

No. 36776B

<9>

Filed 1 - May - 1935

Willie Mae McGuinn

vs.

Robert P. McGuinn

**In the Circuit Court No. 2
of Baltimore City.**

January

TERM, 19*25*

To the Honorable

Judge of the Said Court:

The above cause is respectfully submitted
for decree and the 41st General Equity Rule is hereby waived.

Thurgood Marshall

Solicitor for Plaintiff,
in cross bill

C. Everett Lane

Solicitor for Defendant.

Circuit Court No. 2

30

1935

DOCKET 44 B No. 30

Willie Mae McGuinn

vs.

Robert P. McGuinn

Petition for leave to take Testimony
and Order of Court thereon

F

No. 36776 B
277

Filed 8 - April - 1935

Willie Mae McGuinn
vs.
Robert P. McGuinn

IN THE
Circuit Court No. 2
—OF—
BALTIMORE CITY

To the Honorable the Judge of the
Circuit Court No. 2 of Baltimore City:

THE PETITION OF Willie Mae McGuinn

in this case, respectfully shows that she desire s to take testimony in this
case, and respectfully prays that leave be granted her to do so before one of the
Standing Examiners of this Court.

Augustus Marshall
Solicitor for Plaintiff in Cross Bill

ORDERED, this 8 day of April 1935, that leave be
granted to the parties to the cause, to take testimony, as prayed, before any one of the Standing Ex-
aminers of this Court.

J. Paul Suffer
Judge

Circuit Court No. 2

193

DOCKET No.

44B

30

Willetta Mae McGuire

vs.

Robert P. McGuire

Order of Reference
and Report

ou

No. 36726B

(10-117)

Order Filed 1- day of May, 1935

Report Filed 6- day of May, 1935

Willie Mae McGuinn

vs.

Robert P. McGuinn

IN THE
Circuit Court No. 2

OF

BALTIMORE CITY

March TERM, 1935

This case being submitted, without argument, it is ordered by the Court, this 1-
day of May, 1935, that the same be and is hereby referred to
Ward B. Coe, Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.

J. Grant Suffered
Kellip

Report of Auditor and Master:

Bill for divorce a vinculo matrimonii filed by the husband
against his wife on the ground of abandonment; and cross-bill by
wife against husband for same relief and for the custody of their
minor children on same ground. Code Art. 16, secs. 37-42.

Defendant to each bill answers by solicitor. Testimony
taken on behalf of plaintiff in cross-bill.

Residence of plaintiff in cross-bill in Baltimore City
for more than two years proven.

The marriage proven.

The abandonment by defendant to cross-bill for three years,
its finality, and the irreconcilability of the parties proven.

Case made for giving the custody of said children to the
wife.

More than thirty days have elapsed since the filing of the
cross-bill.

Case submitted and ready for decree.

Ward B. Coe
Auditor and Master
May 2, 1935

44 B30-1935

IN THE
CIRCUIT COURT NO. 2
OF
BALTIMORE CITY

ROBERT P. McGUINN

VS

WILLIE MAE McGUINN

ANSWER TO BILL OF
COMPLAINT

Mr. Clerk: <4>

Please file etc.

Thurgood Marshall

THURGOOD MARSHALL
ATTORNEY AT LAW
604 PHOENIX BUILDING
BALTIMORE, Md.

FILED 11 - March 1935

ROBERT P. McGUINN

vs

WILLIE MAE McGUINN

*

*

*

IN THE
CIRCUIT COURT NO. 2
OF

BALTIMORE CITY

***** 30 B. Dockett No. 44
1935

To the Honorable, the Judge of Said Court:

The Defendant, Willie Mae McGuinn, by her attorney Thurgood Marshall, for answer to the bill of complaint exhibited against her says:

FIRST: She admits the allegations contained in the first paragraph of the Bill of Complaint.

SECOND: She denies the allegations contained in the second paragraph of the Bill of Complaint.

THIRD: She admits the allegations contained in the third paragraph of the Bill of Complaint.

FOURTH: She denies the allegations contained in the fourth paragraph of the Bill of Complaint.

FIFTH: She admits the allegations contained in the fifth paragraph of the Bill of Complaint.

And having fully answered the said Bill of Complaint, the Defendant prays that the said Bill be dismissed.

And as in duty bound, etc.

Thurgood Marshall
Solicitor for Defendant.

Service admitted this 11th day of March 1935.

E. Everett Lane
Solicitor for Plaintiff.

P780

Circuit Court No. 2

30
1935

B

DOCKET No. 44

Mc Guinn

vs.

Mc Guinn

3712 W. Washburn Ave
1404 Madison Ave

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pod

copy-

No. 36776B.

< 2 > < 3 >

copy - copy d

Filed 11 - day of Febry, 1935

" 18 - " " "

E. Everett Lane

Solicitor.

10-18

To the Sheriff

Please serve defendant at place of
employment - 3712 Woodhaven Avenue

EQUITY SUBPOENA

The State of Maryland

To

Willie Mae Mc Guinn

2/11 19*35*

TRUE COPY TEST.

REISSUED TO *Mason* Return Day, 19*35*

John Pleasants
CLERK

John Pleasants
CLERK.

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 *February*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Robert P. Mc Guinn

against you exhibited in the CIRCUIT COURT No. 2 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 *14* day of *January*, 19 *35*
Issued the *30* day of *January*, in the year 19 *35*

John Pleasants
Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

Non Est
Sickey

Joseph C Degan
Sheriff

REISSUED TO

2/11 1935
March
John Pleasant
1935
CLERK

Summoned and a copy of the Process left with
the defendant

Sickey 2+18-35-

Joseph C Degan
Sheriff

Yes p. 95

11

TO THE SUPERINTENDENT OF THE NEW YORK STATE DEPARTMENT OF CORRECTIONS

RECEIVED AT THE SHERIFF'S OFFICE
NOV 16 1961
NEW YORK

RECEIVED AT THE SHERIFF'S OFFICE
NOV 16 1961
NEW YORK

44 B 30-1935

IN THE CIRCUIT COURT NO. 2
of
BALTIMORE CITY.

ROBERT P. MCGUINN
Complainant.

Vs.

WILLIE MAE MCGUINN
Respondent.

BILL FOR
DIVORCE A VINCULO MATRIMONII.

No 36776 B.
Mr. Clerk: 417

Please file.

E. Everett Lane
Solicitor.

E. Everett Lane
Attorney at Law
109 E. Pleasant St.

Id 30- January 1935

ROBERT P. MCGUINN
Complainant.

Vs.

WILLIE MAE MCGUINN
Respondent.

*

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IN

THE CIRCUIT COURT NO 2

OF

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

YOUR ORATOR complaining, respectfully represents:

1. That on or about the 6th day of October, in the year, 1925, he was married by a civil ceremony, to Willie Mae McGuinn, in the City of New York, State of New York, after which time they resided together untill the 23rd day of January, in the year 1932.
2. That ever since their marriage, your Orator has behaved himself as a faithful, chaste and affectionate husband towards the said, Willie Mae McGuinn, his wife, and his entire conduct has been above reproach.
3. That both your Orator and the Respondent are residents of the City of Baltimore, State of Maryland, and have been for a period of more than two years next preceeding the filing of this, his Bill of Complaint.
4. That the Respondent, Willie Mae McGuinn, abandoned and deserted the Complainant, Robert P. McGuinn, on or about the 23rd day of January, in the Year, 1932, without just cause or excuse. That said abandonment and desertion has been continuous, uninterrupted, deliberate and final for a period of more than three years prior to the filing of this his Bill of Complaint and is beyond any reasonable hope or expectation of reconciliation.

2.

5. That there are two children born as a result of said marriage, Ruth Servant McGuinn, 8 years of age, and Roberta Alexander McGuinn, 3 years and 6 months of age, respectfully and that they are now in the custody and care of the Respondent, the said Willie Mae McGuinn, residing in the City of Baltimore, State of Maryland.

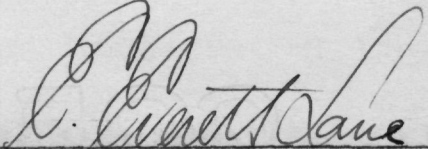
WHEREFORE YOUR ORATOR PRAYS:

- (a) That a decree be passed divorcing your Orator a vinculo matrimonii, from the Respondent, Willie Mae McGuinn.
- (b) For such other and further relief as your Orator's case may require.

MAY IT PLEASE YOUR HONOR: To grant unto your Orator the Writ of Subpoena, directed unto the said Respondent, Willie Mae McGuinn, residing at 1404 Madison Avenue, in the City of Baltimore, State of Maryland, commanding her to be and appear in this Honorable Court, either in person or by solicitor on some day certain to be named therein to answer the premises and abide by and perform such decree as may be passed herein.

AND AS IN DUTY BOUND, etc.,


COMPLAINANT.


Solicitor for Complainant.

Circuit Court No. 2,

B

30

193 5

No. 44

Docket

ROBERT P. McGUINN

vs.

WILLIE MAE McGUINN

XXXXXXXXXXXXXXXXXX

WILLIE MAE McGUINN

vs.

(Cross-
bill)

ROBERT P. McGUINN

DECREE OF DIVORCE

No. *P.* 36776B

<12>

copy <3> - copied 3

Filed

6 - May -

, 193 5

Circuit Court No. 2,

OF

BALTIMORE CITY

ROBERT P. McGUINN

vs.

WILLIE MAE McGUINN

WILLIE MAE McGUINN

vs.

ROBERT P. McGUINN

(Cross-bill)

March

Term, 1935

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

It is thereupon, this 6- day of May, Anno Domini, one thousand nine hundred and thirty-five- by the CIRCUIT COURT No. 2 OF BALTIMORE CITY, Adjudged, Ordered and Decreed, that the said-

- WILLIE MAE McGUINN, in the cross-bill, the above named complainant/be, and she is hereby DIVORCED A VINCULO MATRIMONII, from the defendant. to the cross-bill, the said ROBERT P. McGUINN.

AND IT IS FURTHER ORDERED that said Willie Mae McGuinn shall have the guardianship and custody of Ruth Servant McGuinn and Roberta Alexander McGuinn, the minor children of the parties in the proceedings mentioned, with privilege to said Robert P. McGuinn to see said children at all reasonable times; and that said Robert P. McGuinn shall pay said Willie Mae McGuinn, through the Probation Department of the Supreme Bench of Baltimore City, the sum of \$50.00 per month, accounting from the date of this decree, for the support of said children; all subject to the further order of the Court in the premises.

And it is further Ordered, that the said Robert P. McGuinn- pay the cost of this proceeding.

J. Frank Suffer, Judge

I, JOHN PLEASANTS, Clerk of the Circuit Court No. 2 of Baltimore City, do hereby certify that the above is a true copy of the decree taken from the record of proceedings in said cause.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of the said Court, this day of , 193-

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

Harold B. Cox

Auditor and Master

DEGREE OF DIVORCE

SERVICE OF COPY ADMITTED
THIS 7th DAY OF *May* 1935
WILLIAM L. STUCKERT,
Chief Probation Officer

BALTIMORE CITY

WILLIAM L. STUCKERT

44 B 30-1935

IN THE
CIRCUIT COURT NO. 2
of
BALTIMORE CITY.

WILLIE MAE MCGUINN
Complainant

VS

ROBERT P. MCGUINN
Respondent

ANSWER TO CROSS-BILL.

No 36776B.

Mr. Clerk: <67

Please file.

E. Evertt Lane

Solicitor for Respondent

Feb 13 - March 1935

E. Evertt Lane
109 E. Pleasant Street
Baltimore, Maryland.

ROBERT P. MCGUINN
Complainant

vs

WILLIE MAE MCGUINN
Respondent

and

WILLIE MAE MCGUINN
Complainant

vs

ROBERT P. MCGUINN
Respondent

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IN THE
CIRCUIT COURT NO. 2
OF
BALTIMORE CITY.

30 B. Docket No. 44
1935

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of Robert P. McGuinn, Respondent to the Cross-Bill of Complaint heretofore filed respectfully shows:

FIRST: He admits the matters and facts alleged in the first paragraph of said Cross-Bill of Complaint.

SECOND: He admits in part and denies in part the matters and facts alleged in the second paragraph of said Cross-Bill of Complaint.

THIRD: He denies with great emphasis all the matters and facts alleged in the third paragraph of said Cross-Bill of Complaint.

And having fully answered the said Cross-Bill of Complaint this Respondent prays that the said Bill be dismissed.

And as in duty bound, etc.

P. Everett Lane
Solicitor for Respondent.

Service admitted this 13th day of March 1935.

Thurgood Marshall
Solicitor for Complainant.