

In the Circuit Court
No v B 130/1921

Baltimore City

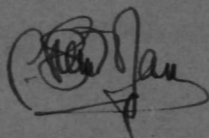
Walter A Green

vs

Hattie Green

Petitioner Applicant
Marriage

W. Clerk please file



No. 20265 B
1

DAVIS & BISHOP
ATTORNEYS AT LAW
BANNEKER BUILDING
14 E. PLEASANT STREET
BALTIMORE, MD.

Filed 22nd March 1921

Walter D. Queen

In The Circuit Court, No. 2.

vs.

of

Hattie Queen

Baltimore City.

To The Honorable Judge of the said Court:-
Your orator complaining respectfully states:-

One, That heretofore to wit, in Baltimore City in the State of Maryland on or about the 30th. day of September, 1908 a ceremony was performed wherefore It was supposed that the complainant and defendant were united in marriage, but which ceremony for the reasons hereⁱⁿ after set forth was then and is now utterly null and void.

SECOND, That no children have been born to the parties to this proceeding.

THIRD, That both the complainant and defendant have resided in the State of Maryland for more than two years prior to the proceeding.

FOURTH, That unknown to the complainant, the defendant was at the time of said pretended marriage, insane and of feeble mind to such degree that she was mentally incompetent to enter into a valid contract of marriage with your orator, so that the supposed marriage aforesaid was then and is now null and void.

FIFTH, That the complainant was induced to enter into said pretended marriage and to participate in the ceremony aforesaid through fraud and deceit then and there practised upon him, in that at the time of and prior thereto the defendant was insane and of feeble mind to such a degree as to be mentally incompetent to enter into a valid contract of marriage with your orator, and prior thereto, that the knowledge of said insanity was fraudulently concealed from the complainant and at time of supposed ceremony was unknown to her, that had he known of said insanity he would not have entered ^{INTO} with said supposed contract of marriage or participated in the aforesaid marriage. But since the said ceremony the defendant has been pronounced incurably insane and is now and for a long period of time has been confined at Bay View hospital as an insane inmate,

WHEREFORE YOUR ORATOR PRAYS:

-a- That the said marriage may be annulled and declared by this court null and void.

a-b- That your orator may be divorced A Vinculo matrimonii from the defendant.

-c- Such other and further relief as the case may require.

May it please your honor to grant unto your orator the states' writ of subpoena, directed unto the said Hattie Queen, residing in the State of Maryland, temporarily at Bay View Hospital, commanding her to be and appear in this court on some day certain to be named therein to answer the premises and to perform such decree as may be passed therein.

Walter D. Queen.
complainant



State of Maryland }
Baltimore City. } To Wit

I hereby certify that on this 13th day of March 1921, before me the subscriber, a notary Public in and for Baltimore, state of Maryland, personally appeared Walter D. Queen, the complainant in the foregoing bill and made oath in due form of law that the matter contained in the same was true to the best of his knowledge and belief.



NOTARY PUBLIC

356

Ct. Ct. No. 2

130
1921

Docket No.

Queen

vs.

Queen

Lunatic

Subpoena to Answer Bill of Complaint

2-Pro

No. 20265 B

2

Copy sent to Speed ✓

Filed _____, 1921

J. Stewart Davis
Solicitor.

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Summoned, by reading Summons to Hattie Queen Lunatic, and a copy of the Process left with Hattie Queen Lunatic. Also copy of the Process left with Dr. Harry Goldsmith in charge of Bay View Hospital for the Insane, the person having the care of Hattie Queen Lunatic named in writ

(Deegan)
(B/S/P/S)

Thomas H. McMully
Sheriff.

6
Fee \$1.00

EQUITY SUBPOENA

The State of Maryland

To

Hattie Queen

Senatus

Bay View Hospital

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

Walter D. Queen

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *14* day of *March*, 1921

Issued the *22* day of *March*, in the year 1921

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.)

Ct. Ct. No. ~~2~~ 9/02

130

19121

DOCKET No. 30

Walter D. Queen

vs.

Hattie Queen

ORDER FOR APPEARANCE

No. 20265A

3

Filed 5 day of April 1912

Walter D. Queen

vs.

Hattie Queen

In the Circuit Court ^{7/02} ~~No. 2~~
of Baltimore City.

TERM, 191

MR. CLERK:

PLEASE ENTER MY APPEARANCE FOR DEFENDANT.

R. M. Bond

Solicitor.

130
1921

J Docket No. 30

Circuit Court No. 2

OF

Baltimore City

Queen

VS.

Queen

**Petition and Order Appointing
Guardian ad Litem.**

Order, _____

Mr. Clerk,

Please file.

(Signature)

No. 20265B

Fd. ⁴ 2nd April 1921

Walter D. Queen
.....
vs.
Hattie Queen
.....
Lunatic
.....

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

To the Honorable, The Judge of Said Court:

The Petition of Plaintiff in this cause respectfully represents unto your Honor.

1st. That *Hattie Queen*
..... *Lunatic* ~~Infant~~ Defendant

in this cause has been duly summoned.

2nd. That said ~~Infant~~ *Lunatic* Defendant has no legal guardian.

Wherefore your Petitioner prays this Honorable Court to appoint a Guardian ad Litem to appear and answer for said Infant Defendant, and suggest that *Milton W. Pearson* who has no interest whatever in this suit be appointed Guardian ad Litem.

And as in duty bound, &c.,

Walter D. Queen
.....

Solicitor for Plaintiff.

ORDERED, by the Circuit Court No: 2 of Baltimore City on this *22nd* day of *April* 19*11*, upon the foregoing petition that *Milton W. Pearson* *Lunatic* ~~Infant~~ be and he is hereby appointed Guardian ad Litem for the ~~Infant~~ Defendant named in the foregoing petition and he is hereby directed to appear and file his answer in *his* behalf.

H. Arthur Stump
.....

3/18/14/2

P 130
1921

IN THE CIRCUIT COURT NO. 2
of Baltimore City.

Walter D. Queen

vs.

Hattie Queen,
a lunatic.

-PETITION.-

Mr. Clerk:-

Please file.

No 20265 B

Superior Court.

BALTIMORE, MD.

FILED

23 April 1921

WALTER D. QUEEN

IN THE CIRCUIT COURT NO. 2
OF BALTIMORE CITY.

vs.

HATTIE QUEEN,
a lunatic.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Petition of Milton W. Peacock, Guardian ad litem respectfully shows:

FIRST: That on the day of April 1921, Your Petitioner was appointed by this Honorable Court, Guardian ad litem for the Defendant, Hattie Queen, who is a lunatic.

SECOND: That owing to the nature of these proceedings, Your Petitioner believes it advisable that he be represented by Counsel in this case, and respectfully suggests the name of Roy S. Bond, Esq., a member of the Baltimore Bar.

Wherefore Your Petitioner prays that an Order be passed in the premises.

As in duty bound, etc.,

Milton W. Peacock
Guardian ad litem.

ORDERED by the Circuit Court No. 2 of Baltimore City, this 23 day of April, in the year 1921, that..... Roy S. Bond..... be, and he is hereby appointed Counsel to represent Milton W. Peacock, Guardian ad litem for Hattie Queen, the lunatic Defendant herein :

H. Arthur Stump

130
1921

J Docket No. 2

Circuit Court No. 2
OF
Baltimore City

Walter S. Queen

VS.

Bessie Queen

Executrix

ANSWER OF

Melba W. Parsons

Guardian ad Litem.

Mr. Clerk,
Please file.

No. 211265 B
6

Filed 23 June 1921

Walter S Queen
VS.
Hattie Queen
Lunatic

IN THE
CIRCUIT COURT No. 2
OF
BALTIMORE CITY.

To the Honorable,
The Judge of said Court:

The Answer of Hattie Queen
Lunatic
the ~~Infant~~ Defendant

named in the Bill of Complaint in this Court against her exhibited, by Milton
W Peacock duly appointed Guardian ad Litem respectfully represents unto
your Honor:

That the Defendant being a Lunatic ~~Infant~~ ~~under the age of twenty-one years~~ cannot
admit nor deny, the allegations set up in said Bill of Complaint and therefore submit her
rights to the protection of this Honorable Court.

And as in duty bound, &c.,

Milton W Peacock
Guardian ad Litem.