

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

*B 12  
1926*

FLORENCE GOODMAN

VS.

RAYFIELD GOODMAN

*619 Bradley St.*

BILL FOR DIVORCE.

*B 30,284*

Mr. Clerk: -

*(1)*  
Please file.

*Davis & Evans*  
ATTORNEYS FOR PLAINTIFF.

J. STEWARD DAVIS  
ATTORNEY AT LAW  
215 SAINT PAUL PLACE  
BALTIMORE, MD.

*FD 8" Jan 1926*

FLORENCE GOODMAN : IN THE CIRCUIT COURT

vs. : OF

RAYFIELD GOODMAN : BALTIMORE CITY.

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, Rayfield Goodman, on the 24th day of November, 1912 and with whom she resided until about the 15th day of January, 1921 when the defendant deserted the plaintiff.
2. That though the conduct of your Oratrix toward the said Rayfield Goodman has always been kind, affectionate and above reproach, he has, without any just cause or reason abandoned and deserted her and has declared his intentions to live with her no longer, and that such abandonment has continued uninterruptedly for more than three years and is deliberate and final and the separation of the parties is beyond any reasonable expectation of reconciliation.
3. That your Oratrix has not lived or co-habited with the said defendant since said desertion.
4. That there are two children born as issue of said marriage, Rosetta, age eleven years and John W. age ten years for whom the plaintiff prays the custody.
5. That your Oratrix is destitute and without means of financing the expenses of this suit and that she is advised by Counsel that she is entitled to have an order passed by this Honorable Court awarding her some amount as alimony pending this litigation and some certain amount to compensate her

solicitor. The defendant is employed and earns about thirty dollars per week..

6. That both your Oratrix and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this Bill of Complaint.

TO THE END, THEREFORE:

- (a) That your Oratrix may be divorced a Vinculo Matrimonii from the said Rayfield Goodman.
- (b) Alimony and Counsel fee.
- (c) That she may have such other and further relief as her case may require.

May it please your Honor to grant unto your Oratrix the Writ of Subpoena directed against the said Rayfield Goodman commanding and requiring him to be and appear in this Court on some day certain to be named therein to answer the premises and abide by and perform such decree of order as may be passed therein.

AND as in duty bound, etc.

  
\_\_\_\_\_  
ATTORNEYS FOR PLAINTIFF.

P376

Ct. Ct.

B-12

192 6. Docket No.

FLORENCE GOODMAN

vs.

RAYFIELD GOODMAN

619 Bradley Street

SUBPOENA TO ANSWER BILL OF COMPLAINT

*Pw*

No. B-30284

(2)

Filed *9 Jan*, 192*6*

Davis & Evans

SOLICITOR

*10*

*Summoned and a copy of the Process left with the defendant*

*(Brady)*  
*(1/8/26)*

*Recd \$0.50*

*John E. Price*  
*Sheriff*

EQUITY SUBPOENA

The State of Maryland

To RAYFIELD GOODMAN

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

FLORENCE GOODMAN

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 JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the 9TH day of November, 192 5. Issued the 8th day of January in the year 192 6.

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.

B Docket 12  
1926

**CIRCUIT COURT.**

Florence Goodman

vs.

Rayfield Goodman  
619 Bradley St.

**Order for Alimony**

Pendente Lite

**ORDER**

B No. 30284

( ) (B)

*\$80 per wk  
2 children*

Fd.: 9 Jan 1926  
10

*Copy of the within Order of Court served  
on Rayfield Goodman on the 11th day of  
January 1926 in Presence of August J. Buchy*

*Fee \$0.50*

*John E. Potee  
Sheriff*

Florence Goodman  
vs.  
Rayfield Goodman

IN THE  
**CIRCUIT COURT**  
OF  
**BALTIMORE CITY**

TERM, 192

ORDERED BY THE COURT this 9<sup>th</sup> day of January 1926

that the defendant

Rayfield Goodman

pay to the plaintiff

Florence Goodman

the sum of

Fifteen

Dollars per week, during the continuance of this suit, accounting from the

day of

January 1926

to the said plaintiff

Florence Goodman

as alimony, *pendente lite* unless cause to the contrary be shown on or before the

25<sup>th</sup>

day of

January 1926

, provided a copy of this Order be served on the said defendant

Rayfield Goodman

on or before the

20<sup>th</sup>

day of

January 1926

James P. Goster

TRUE COPY—TEST:

CLERK

12-1926

IN THE  
CIRCUIT COURT OF  
BALTIMORE CITY.

B 12  
1926

FLORENCE GOODMAN

VS.

RAYFIELD GOODMAN.

ANSWER TO BILL OF COMPLAINT  
AND  
ORDER OF NISI.

MR. CLERK:  
PLEASE FILE:

*Michael F. Freedman*  
SOLICITOR FOR RESPONDENT.

B 30284  
(4)

MICHAEL F. FREEDMAN  
ATTORNEY AT LAW  
818 EQUITABLE BUILDING  
BALTIMORE, MD.

FILED

25 Jan 1926



FLORENCE GOODMAN

VS.

RAYFIELD GOODMAN

)

)

)

IN THE

CIRCUIT COURT OF

BALTIMORE CITY.

\*\*\*\*\*

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Respondent in answer to the Bill of Complaint heretofore filed in the above entitled cause and in answer to the Order heretofore passed by this Honorable Court directing your respondent to pay unto the Complainant the sum of \$15.00 a week as alimony pendente lite unless cause to the contrary be shown on or before the 25th day of January, 1926, respectfully represents unto Your Honor as follows:

1-That your respondent admits the allegations as contained in the first, fourth and sixth paragraphs of said Bill of Complaint.

2-That your Respondent denies the allegations as contained in the second, and third paragraphs of said Bill of Complaint.

3-That in answer to the fifth paragraph of said Bill of Complaint your respondent denies that he earns the sum of \$30.00 or thereabouts per week as alleged in said paragraph but on the contrary avers that he is a laborer at odd jobs without steady employment and that his average weekly earnings are about \$12.00 weekly.

Having fully answered said Bill of Complaint your respondent respectfully prays that same be dismissed with his reasonable costs and that the Order heretofore passed by this Honorable Court be modified.

And as in duty bound, etc.

*Rayfield* his  
+  
mark *Goodman*  
RESPONDENT.

*Michael F. Goodman*  
SOLICITOR FOR RESPONDENT.

Davis Evans

12 Ct. Ct.  
1926 No. B66 Docket

Florence Goodman

vs.

Rayfield Goodman

MOTION FOR HEARING

B 30284  
57

No.

M. F. Freedman

Filed 28 day of Jan 1926

*Florence Goodman*  
-----  
vs.  
*Rayfield Goodman*  
-----  
-----

IN THE  
**CIRCUIT COURT**  
OF  
BALTIMORE CITY

The *plaintiff* by *Davis T Evans*  
*her* Solicitor<sup>s</sup> applies to have the above entitled cause placed on the Trial Calendar  
for hearing *on alimony pendente lite*  
-----  
-----  
-----  
-----

in conformity with the First Equity Rule.

*Davis T Evans*  
Solicitor for *plaintiff*

Serve on

M.F. Friedman

Service admitted  
this 29th day of  
January, 1926.

Michael F.  
Friedman

Ct. Ct.

12  
1926 BNo. 66 Docket

Goodman

vs.

Goodman

**NOTICE OF HEARING**

B- No. 30284  
(6)

No.

Filed 28 day of Jan 1926

H

Copy of the within Notice served on M. F. Friedman,  
Solicitor on the 29th day of January, 1926, in  
the presence of Louis Alcott.  
John E. Potee  
Fees \$0.50  
Shuff

CIRCUIT COURT

818  
Equ

Florence Goodman  
vs.  
Rayfield Goodman

IN THE  
**CIRCUIT COURT**  
OF BALTIMORE CITY

Upon application made by the Solicitor for the

Plaintiff

the above entitled cause has been placed upon the trial calendar in accordance with the provisions of the First Equity Rule, and the same will stand for hearing on

Alimony Pendente Lite

when reached in due course on said calendar.

CHARLES R. WHITEFORD

*Clerk Circuit Court.*

CIRCUIT COURT

12  
1926 B

No. 66 B Docket.

*Florence Goodman*

vs.

*Rayfield Goodman*

Final Order, Counsel Fee and Alimony

*Pendente Lite.*

B No. 30284 B  
7

Filed

*23 Feb*

1926

Florence Goodman  
vs.  
Rayfield Goodman

IN THE  
**CIRCUIT COURT**  
OF  
BALTIMORE CITY.

Jan

Term, 1926

This cause coming on to be heard upon the petition for Alimony *pendente lite* and Counsel fee, and the answer thereto, and testimony taken, and having been submitted by the solicitors for the respective parties;

ORDERED by the Circuit Court of Baltimore City this 23<sup>rd</sup> day

of Feb 1926, that the Defendant;

pay to the Plaintiff

the sum of \_\_\_\_\_ Dollars, as counsel fee for

the Solicitor of the \_\_\_\_\_ and that he

further pay the sum of Four and  $\frac{50}{100}$  (\$4.50) Dollars per week,

to the said Plaintiff; Florence Goodman

as Alimony *pendente lite* accounting from the 8<sup>th</sup> day of Feb 1926

and continuing until the \_\_\_\_\_ day of \_\_\_\_\_ 1926, (should this suit be so long pending) or until the further order of this Court.

payable through the prisoners aid Society.  
This in view of the order heretofore passed and  
said to have been met

Wm F. Owen

Circuit Court

12  
192 6

Docket B66

Florence Goodman

vs.

Rayfield Goodman

Petition for leave to take  
Testimony and Order of  
Court thereon

Sapp  
B

No. 30284  
(8)

Filed 10 April ..... 192 6



*Florence Goodman*

vs.

*Rayfield Goodman*

IN THE

**Circuit Court**

OF

BALTIMORE CITY

**To the Honorable the Judge of the  
Circuit Court of Baltimore City:**

THE PETITION OF *Florence Goodman*

*Plaintiff,*

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

*Davis & Evans*  
Solicitor for *plaintiff*

ORDERED, this ... *10* day of *April* 192*6*, that leave be granted to the parties to the cause, to take testimony, as prayed, before any one of the Standing Examiners of this Court.

*James P. Gorter*

Serve on

Ct. Ct.

B 12  
1926

Michael Friedman  
att'y  
818 Equitable Bldg

Florence Goodman

VS.

Rayfield Goodman

ORDER OF COURT

B No. 30284 B.  
(19)

Filed 11<sup>th</sup> June 1926  
3

copy of the within Order of Court served on Michael F. Friedman, the defendant's Attorney on the 15<sup>th</sup> day of June, 1926 in presence of Adam S. Buck  
Jehy E. P. [Signature]  
New \$0.50

*Florence Goodman*

vs.

*Rayfield Goodman*

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this *11<sup>th</sup>* day of *June* 192*6*  
that the *Rayfield Goodman* appear before this Court in person,  
on the *21* day of *June*, 192*6* at 10 o'clock A. M., and then and there show cause,  
if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying  
the Order of this Court passed on the *23<sup>rd</sup>* day of *Feb*, 192*6*, directing the  
payment of Alimony, pendente lite, by him to the *Plaintiff*  
provided a copy of this Order be served on the said *Rayfield Goodman*  
on or before the *19* day of *June* 192*6*

*Richard*

3/3/27

Doc. B  $\frac{12}{1926}$

In the Circuit Court, —  
OF BALTIMORE CITY

DEPOSITIONS

*Florence Goodman*

vs.

*Rayfield Goodman*

No. 30284 B.

PLAINTIFF'S COSTS

Examiners ..... \$ .....  
Copies .....  
Sheriff .....  
Stenographer .....  
\$ \_\_\_\_\_

DEFENDANT'S COSTS

Examiners ..... \$ .....  
Copies .....  
Sheriff .....  
Stenographer .....  
\$ \_\_\_\_\_

Faint, mirrored text from the reverse side of the page, including the word "DEPOSITIONS" and other illegible words.

*Ret'd for safe keeping*

8-4-26

FLORENCE GOODMAN

VS

RAYFIELD GOODMAN

TESTimony taken before me, A. de Russy Sappington, EXAMINER, at my offices in the Title Building, Baltimore, Maryland, on April 9, 1926, at 3.00 o'clock in the afternoon.

--

Thereupon---

FLORENCE GOODMAN,

the plaintiff, of lawful age, produced on her own behalf, having been first duly sworn according to law, was examined and testified as follows:

By the Examiner:

Q State your name, age and occupation and residence?

A Florence Goodman, 2516 Raynor Avenue, days work.

Q Do you know the parties to this suit?

A Yes, I am the plaintiff and my husband is the defendant.

By Mr. Evans:

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

A On November 24, 1912, by a minister of the

Gospel in Baltimore, Md.

Q Are you living with your husband now?

A No

Q Which left the other and when?

A He left me on the 15th of January 1921.

Q Did you give him any just cause?

A None at all.

Q Were you a kind, faithful and affectionate wife?

A Yes, always.

Q State the circumstances surrounding the separating?

A The only thing he just walked off and left me, and I went to him and asked him to come back and he refused- he said he couldn't support me.

Q Has the separation continued uninterruptedly more than three years before this bill was filed?

A Yes. And he hasn't supported me or the children since he left.

Q Are there any children as result of this marriage?

A Two, Rosetta, eleven and John Walter, ten. They are with me.

Q Are you able and willing to support and educate them?

A Yes, I send them to school every day.

Q Have you lived in the City of Baltimore, State of Maryland, for more than two years before this bill was filed?

A Yes

Q Is this separation deliberate and final and beyond any reasonable hope of reconciliation?

A Yes, it is.

Q How much do you make a week on the average?

A Nine dollars a week on the average.

Q How much does it take to support these children?

A More than I make.

Q How much do you think your husband ought to contribute toward the support of these children?

A Eight dollars a week.



GENERAL QUESTION

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

A. <sup>210</sup>  
*Florence Goodman*

Thereupon---

ANNA BRAXTON,

a witness of lawful age, produced on behalf of the plaintiff, having been first duly sworn according to law, was examined and testified as follows:

By the Examiner:

Q State your name, residence and occupation?

A Anna Braxton, 709 Bruin Street; housework.

Q Do you know the parties to this suit?

A Yes, sir.

By Mr. Evans:

Q Were they married and did they live together at one time as husband and wife?

A Yes, sir.

Q Were they known and recognized in the community in which they lived as such?

A Yes, sir.

Q Are they living together now?

A No, sir.

Q Did you visit them while they lived together?

A Yes, sir, I did.

Q State whether or not Mrs. Goodman was a kind, affectionate and faithful wife?

A She was. She done the very best she could.

Q Did she give her husband any just cause to leave her?

A No, sir.

Q When did he leave?

A On January 15, 1921.

Q State the circumstances surrounding the separation?

A He said he was going to work and he never returned to live with her after that. He left her with nothing to eat. She asked him to come back after he left and he said he didn't want her because he couldn't support her.

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

A It has, yes, sir, since January 15, 1921.

Q Is the separation deliberate and final and beyond any reasonable hope or expectation of reconciliation?

A Yes, sir, it is.

Q There are two children as result of this marriage as stated by the mother; is that correct?

A Yes, sir. They are with their mother and she takes good care of them and sends them to school.

Q Is she a fit and proper person to have the custody of the children?

A Yes, sir, she is.

Q Has Mrs. Goodman, the plaintiff, been a resident, of the City of Baltimore, State of Maryland for more than two years prior to the filing of this bill?

A Yes, sir, she has.

Q Has her husband supported her since the separation?

A No, sir.

GENERAL QUESTION

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

A.-----<sup>No.</sup>

*in*  
Luna & Bampton  
mark

*Test:  
A. Estabrook*

Florence Goodman

.....

vs.

Rayfield Goodman

.....

In the Circuit Court

OF BALTIMORE CITY.

The above cause being at issue

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

of a desire to take testimony in the same, I, A. de RUSSY SAPPINGTON, 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

..... day of April 1926, met on

the..... day of April in the year nineteen

hundred and twenty-six at my office, in the city of Baltimore, in the State

of Maryland, and assigned the..... day of April

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

office of A. de R. Sappington, Esq. 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

.....to take the following depositions, that

is to say:—