

IN THE CIRCUIT COURT OF

BALTIMORE CITY,

*B 32
1926*

OLIVER BROWN

VS.

MAGGIE BROWN

809 Hanover St

BILL FOR DIVORCE.

B 30324

Mr. Clerk:-

(1)
Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF.

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

Filed 20 Jan 1926

OLIVER BROWN : IN THE CIRCUIT COURT
VS. : OF
MAGGIE BROWN : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

1. That he was married to his wife, Maggie Brown, on the 29th day of October, 1913 in Ellicott City, Maryland and lived together as man and wife until the 24th day of April, 1924.
2. That ever since said marriage your Orator has behaved himself as a faithful, chaste and affectionate husband toward the said Maggie Brown.
3. That the said Maggie Brown, has on divers days and times since said marriage, committed the crime of adultery with divers lewd and abandoned men, whose names are unknown to your Orator.
4. That said offense has not been condoned by your Orator, and that your Orator has not lived or co-habited with the said defendant since he discovered said adulteries.
5. That there are two children born as issue of said marriage; Mabel, age six years and Wilbur, age three years.
6. That both your Orator 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 Orator may be divorced A Vinculo Matrimonii from the said Maggie Brown.
- (b) That he may have the custody of his daughter, Mabel.
- (c) That he may have such other and further relief as his case may require.

May it please your Honor to grant unto your Orator
the Writ of Subpoena directed against the said Mabel Brown,
commanding and requiring her 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 or order as may be passed
therein.

AND as in duty bound, etc.

Baird v Evans

ATTORNEYS FOR PLAINTIFF.

P 395

Ct. Ct.

B 32
192 6

Docket No.

Oliver Brown

vs.

Maggie Brown

809 Hanover St.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

~~B 30334~~

B-30324

12

Filed

25th January

1924

Davis & Evans

SOLICITOR

8

Summoned" and a copy of the Process left
with the defendant
Mitchell
1-22-26
Fees \$0.80
John E. Patee
Sheriff

EQUITY SUBPOENA

The State of Maryland

On Maggie Brown

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

Oliver Brown

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 11th day of January 192 6 Issued the 20th 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.

32-1926

In the Circuit Court
of Baltimore City.

B 32
1926

Oliver Brown

Vs.

Maggie Brown

ANSWER

to Bill for Divorce

Mr. Clerk:

Please file.

Linwood G. Koger
Atty. for Defendant.

B 30324
(3)

LINWOOD G. KOGER,
Atty. & Counselor-at-Law,
407 W. Franklin Street,
Baltimore, Md.

Filed 20 Feb 1926

IN THE CIRCUIT COURT OF BALTIMORE CITY

Oliver Brown
Vs.
Maggie Brown.

To the Honorable, the Judge of said Court:

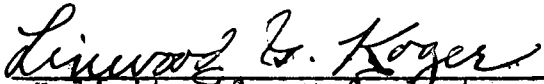
The answer of Maggie Brown to the bill of Complaint of Oliver Brown, against her exhibited.

This defendant answering says:

1. That she admits paragraph one.
2. That she most emphatically denies paragraph two and to the contrary says that the said Oliver Brown has been guilty of illicit relations with divers women whose names will be disclosed on the day of trial, also that he has just completed a term in the Maryland State Penitentiary for his illicit conduct with one of said women, and that the said acts were committed without her procurement, connivance or consent.
3. That she denies paragraph three, also four which latter is related and dependent upon three.
4. That she admits paragraphs five and six.

Wherefore, your respondent prays that the bill of complaint be dismissed with costs to the plaintiff and for such other relief as this honorable court may deem just and proper.

As in duty bound, etc.


Solicitor for Defendant.

3/18/29
32-1926
In the Circuit Court
of Baltimore City.

B 32
1926
MAGGIE BROWN

VS.

OLIVER BROWN .

500 W. Montgomery St.

Petition
for
Alimony and Counsel Fees

Mr. Clerk:

Please file.

Linwood G. Koger
Atty. for Petitioner.

B 30324
(4)

LINWOOD G. KOGER,
Atty. & Counselor-at-Law,
407 W. Franklin Street,
Baltimore, Md.

Filed 20 Feb 1926

MAGGIE BROWN)
))
 VS.) In the Circuit Court of Baltimore City.
))
OLIVER BROWN)

TO THE HONORABLE THE JUDGE OF SAID COURT:

Your petitioner for Alimony and Counsel fees says most respectfully:

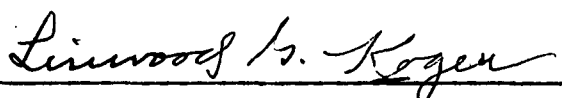
1. That heretofore a bill for divorce a vinculo matrimonii has been filed in this Honorable court and the charges therein are false and without foundation as will appear in her answer heretofore filed .

2. That your petitioner is destitute and without means of support for herself and two children, hence, she is advised that she is entitled to have an order passed by this honorable court requiring the ~~bill~~ said Oliver Brown to pay her a reasonable and proper sum for alimony pendente lite for the support of herself and the said two children and that she may have a reasonable and proper sum to defray the necessary expenses of her defence of said bill, and to compensate the solicitor whom she has employed.

3. That the plaintiff in the said bill is a man capable of making from twenty-five (25) to thirty-five (35) dollars per week, and that in view of this fact and of the serious charge against your petitioner, she is entitled to a liberal allowance to be made to her for her defence.

Your petitioner therefore prays your Honor to pass an order requiring the said Oliver Brown to pay to her alimony pendente lite and at such intervals as to the court may seem proper, also counsel fees and such other sums as this honorable court may think just and proper.

And as in duty bound, etc.



Solicitor for Petitioner.

STATE OF MARYLAND, BALTIMORE CITY, to wit:

I hereby certify that on this 20 day of February, 1926,
before me, the subscriber, a ~~justice of the peace~~ ^{Notary Public} of the State of
Maryland in and for the said city, personally appeared the above
named Maggie Brown and made affirmation in due form of law that
the matter and facts in ~~of~~ the foregoing petition are true to the
best of her and belief.

Quinced Caplan
~~Justice of the Peace.~~
Notary Public

Sappington has
these papers
Docket B. 32
1926

Circuit Court

Oliver Brown

VS.

Maggie Brown

Order Counsel Fee and Alimony

Pendente Lite

No. B 30324

\$25 to 30 per wk
2 chn

Linwood G Koger
Sol.

FD 23 Feb 1926
" 26 March 1926

Now set plus E. Potee
John E. Potee
Sheriff

(2nd Return)
Copy of the within Order of Court served
on Oliver Brown on the 26th day March 1926
in the presence of Dennis J. Mitchell

Fees \$0.50

Oliver Brown

vs.

Maggie Brown

—IN THE—

CIRCUIT COURT

—OF—

BALTIMORE CITY

January TERM 1926.

ORDERED BY THE COURT this *23* day of *February* 1926

that the Plaintiff *Oliver Brown*

pay to the Defendant *Maggie Brown*

the sum of *Twenty Five* Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of *Twelve*

Dollars per week, during the continuance of this suit, to the said Defendant *Maggie Brown*

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the *10*"

day of *March* 1926, provided a copy of this Order be served on the said Plaintiff

Oliver Brown on or before the *3*"

day of *March* 1926.

James P. Gorter

TRUE COPY—TEST:

.....
CLERK

Circuit Court

32
1926

Docket B66

Oliver Brown

vs.

Maggie Brown

app

Petition for leave to take
Testimony and Order of
Court thereon

B No. 30324
(6)

Filed 19 March 1926

Oliver Brown

vs.

Maggie Brown

IN THE

Circuit Court

OF

BALTIMORE CITY

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

THE PETITION OF *Oliver Brown*

in this case, respectfully shows that *he* 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 *19* day of *March* 1926, 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. Foster

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this 26 day of March 1926, that the time for showing cause under said Order be extended to the 12 day of April 1926, and the time for service of a copy of the same be extended to the 8 day of April 1926.

James P. Forter

Doc. B ³²
1920

**In the Circuit Court,
OF BALTIMORE CITY**

DEPOSITIONS

Oliver Brown

vs.

Maggie Brown

No. 30324B

PLAINTIFF'S COSTS

Examiners..... \$
Copies..... \$
Sheriff..... \$
Stenographer..... \$
\$ _____

DEFENDANT'S COSTS

Examiners..... \$
Copies..... \$
Sheriff..... \$
Stenographer..... \$
\$ _____

Oliver Brown

vs.
Maggie Brown

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 *nineteenth* day of *March* 19 *26*, met on the *twenty-fourth* day of *March* in the year nineteen hundred and *twenty-six* at my office, in the city of Baltimore, in the State of Maryland, and assigned the *twenty-sixth* day of *March* in the same year at *one* o'clock in the *after* - noon and the office of *Ade 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 *respective parties* to take the following depositions, that is to say:—

8-4-26

2

OLIVER BROWN

VS.

MAGGIE BROWN.

Testimony taken before me, A. deRussy
Sappington, Examiner, at my offices in the Title
Building, Baltimore, Md. on March 26, 1926, at 1.00
o'clock in the afternoon.

Mr. George Evans appeared for the Plaintiff.

Mr. L. G. Koeger appeared for the Defendant.

Thereupon---

OLIVER BROWN,

the plaintiff, of lawful age, produced on his own
behalf, 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 Oliver Brown, 500 Henrietta Street, stevedore.

Q Do you know the parties to this suit?

A Yes; I am the plaintiff and the defendant
is my wife.

By Mr. Evans:

Q When, where and by whom were you married?

A Ellicott City, Maryland, on October 29, 1923, by a Minister of the Gospel.

Q And you lived with her until when?

A April 14, 1924.

Q When you were committed to the--

A House of Correction.

Q Were you a kind, affectionate and faithful husband?

A I was.

Q You have charged your wife with adultery. What if anything do you know about that?

A I read of her having a child while I was incarcerated and that is all I know. I read I was supposed to be the father and I know it couldn't happen.

Q You were arrested on the 14th of April, 1924?

A Yes.

Q Were you released on bail after that?

A No.

Q And you were sentenced to the House of Correction for --

A Manslaughter, on May 19, 1924. I remained at the House of Correction nearly two months and was transferred to the Maryland Penitentiary.

Q You were in the House of Correction and Maryland Penitentiary right along until when?

A Until January 19, 1926. I remained there all the time.

Q Did you see your wife in there?

A Once.

Q Did you have any relations with her between April 14, 1924 when you were arrested and the time you were released?

A No.

Q No relations with her from the 19th of January, when you were released?

A No.

Q You had no relations with her since then?

A No, sir.

Q Have you lived or cohabited with her since you learned of her adulteries?

A No, sir.

Q Are there any children as result of your marriage?

A Two; Mable, age 6 and Wilbur, age 3.

Q Are you a resident of the City of Baltimore, State of Maryland?

A I always lived here.

Q Are you willing to provide for the children?

A I am.

CROSS EXAMINATION:

By Mr. Koeger:

Q What is your earning capacity?

A \$18.00 a week.

MR. KOEGER: I reserve the right to cross examine all the witnesses further.

NOTE: Signature and general question waived by consent of solicitors.

Thereupon---

J. GUY BOWLEY,

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 J. Guy Bowley, 908 South Sharp Street,
physician.

Q Do you know the parties to this suit?

A Yes, both of them.

By Mr. Evans:

Q Do you know that they were married and lived together at one time as husband and wife and were so regarded among their friends, relatives and acquaintances?

A I do.

Q Was he a good faithful husband?

A He was.

Q Did you attend Mrs. Brown, the defendant, at 211 West Montgomery Street, during the year 1925?

A I did.

Q Did you attend her on the 11th of May, 1925?

A I did.

Q Have you your records?

A Yes, I have a stub here. The stub shows that on the 11th of May, 1925, at 211 Montgomery Street I was called on a confinement case--Mrs. Maggie Brown, maiden name Mrs. Maggie Parker, birthplace, Maryland, number of children born to mother is six, according to the Health Department---sex of child, male. And she gave me the full name of father as being Oliver Brown, occupation, laborer; birthplace, Maryland.

Q Do you know where Brown was at that time?

A He was in an institution.

Q Do you know how long he had been there?

A No.

Q All you know is what your records show as to the delivery of the child and facts given by Mrs. Brown?

A Yes.

MR. EVANS: . I offer this certificate.

(Paper filed and marked Plaintiffs Exhibit

MR. EVANS: I offer in evidence certified copy of the docket entries of the Criminal Court.

(Paper filed and marked Plaintiffs Exhibit Examiner No. 2.)

MR. KOEGER: I reserve the right the cross examine.

NOTE: Signature and general question waived by consent of solicitors.

Thereupon--

WILBUR BROWN,

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 Wilbur Brown, 618 Montgomery Street; insurance agent.

Q Do you know the parties to this suit?

A Yes, sir.

By Mr. Evans:

Q You know they were married and lived together as husband and wife?

A Yes.

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

A Yes, sir.

Q Do you know that there are two children as result of the marriage, as stated by Mr. Brown?

A Yes.

Q Is Mr. Brown a resident of the City of

Baltimore, State of Maryland?

A Yes, he always lived here, and his wife too.

Q Since Mr. Brown found out that his wife committed adultery, has he lived or cohabited with her?

A No, sir.

Q Has he forgiven or condoned her offense?

A No, sir.

MR. KOEGER: I reserve the right the cross-examine.

NOTE: Signature and general question waived by consent of solicitors.

No other witnesses being named or produced before me, I then, at the request of the Solicitor of the respective parties closed the depositions taken in said cause and now return them closed under my hand and seal, on this _____ day of _____ in the year of Our Lord nineteen hundred and twenty six at the City of Baltimore, in the State of Maryland.

(SEAL).
Examiner.

There are two Exhibits with these depositions, to wit:
Plaintiff's Exhibit Examiner No 142
Defendant's Exhibit _____

Examiner.

I, A. de RUSSY SAPPINGTON, 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.

Examiner.

Rec'd for safe keeping

DOC. B 32
1926

IN THE CIRCUIT COURT

No.

OF BALTIMORE CITY

Oliver Brown

vs.

Maggie Brown

PLAINTIFF'S EXHIBIT
EXAMINER No. 1

No. 30324 B.

FILED WITH THE EXAMINER

Mar 26th 1926

A. deR. SAPPINGTON
EXAMINER

No. 14144

Price 50 cents

HEALTH DEPARTMENT—CITY OF BALTIMORE

MAR 26 1925

CERTIFICATE OF BIRTH

(1) PLACE OF BIRTH

CITY OF BALTIMORE

Registered No.

683229

(No.)

211 W. Montgomery

St. ;

22

Ward)

(2) FULL NAME OF CHILD

Infant Brown

If child is not yet named, make supplemental report, as directed

(3) Sex of Child <i>Male</i>	(4) Twin, triplet, or other? (To be answered only in event of plural births)	(5) Number (in order of birth)	(6) Legitimate? <i>Yes</i>	(7) Date of Birth <i>5-11-25</i> (Month) (Day) (Year)
---------------------------------	---	--------------------------------	-------------------------------	---

(8) FULL NAME FATHER
Oliver Brown

(14) FULL MAIDEN NAME MOTHER
Maggie Parker

(9) RESIDENCE
211 W. Montgomery St.

(15) RESIDENCE
211 W. Montgomery St.

(10) COLOR
Colored

(11) AGE AT LAST BIRTHDAY
27
(Years)

(16) COLOR
Colored

(17) AGE AT LAST BIRTHDAY
25
(Years)

(12) BIRTHPLACE
Ind

(18) BIRTHPLACE
Ind

(13) OCCUPATION
Storekeeper

(19) OCCUPATION
Wife

(20) Number of children born to this mother, including present birth
6

(21) Number of children of this mother now living
2

CERTIFICATE OF ATTENDING PHYSICIAN OR MIDWIFE*

(22) I hereby certify that I attended the birth of this child, who was BORN ALIVE at *9:30* o'clock, *a* M., on the date above stated.

(23) Signature *J. Guy Bowley*

*When there was no attending physician or midwife then the father, householder, etc., should make this return. A stillborn child is one that neither breathes nor shows other evidence of life after birth.

(24) Given name added from a supplemental report....., 19

Address *908 S. Sharp St.*
Filed *May 14, 1925*

George H. Green
Registrar

(READ THE REVERSE SIDE)

SEE INSTRUCTIONS ON THE BACK OF CERTIFICATE

MARGIN RESERVED FOR BINDING

WRITE PLAINLY, WITH UNFADING INK—THIS IS A PERMANENT RECORD.

N. B.—In case of more than one child at a birth, a SEPARATE RETURN must be made for each, and the number of each, in order of birth, stated

This is a true copy of the record of birth in the Department of Health

Stillbirths require a birth certificate and a death certificate.

If a birth occurs in a Hospital or other institution, the following additional facts must be given. If the parents do not live in Baltimore write in the name of the State in which they reside.

25. Residence of Parents, No..... Street

26. Was the child cared for by parent.....

Or removed to some institution.....

Or adopted by private family.....

27. Name of institution to which it was removed.....

REMARKS :

DOC. B 32
1926

IN THE CIRCUIT COURT

No. _____

OF BALTIMORE CITY

Oliver Brown

vs.

Maggie Brown

PLAINTIFF'S EXHIBIT
EXAMINER No. 2

No. 30324B

FILED WITH THE EXAMINER
Mar 26th 1926
A. deR. SAPPINGTON
EXAMINER

STATE OF MARYLAND

vs.

Short Copy of Docket Entries



Faint, illegible text, likely bleed-through from the reverse side of the page. Some words like "Criminal Court of Baltimore" and "N. D. 10" are partially visible.

State of Maryland

vs.

Oliver Brown

IN THE

Criminal Court of Baltimore

Jan Term, 1924

No. *1271*

(Prosecuting Witness

Charge, *Murder*

Lieut A. S. Parr

24 April

Commitment filed,

Recognizance filed,

24 April

Presentment filed—e.—d.—Capias issued—*cepi In Jail*

Recognizance taken,

29 April

Indictment filed,

19 May

Arraigned and pleads, *Guilty of Manslaughter*

" "

Submits under plea, *Guilty Manslaughter* before *Justice J.*

Verdict:

19 May

Judgment *Two Years in the Maryland House of Correction*

STATE OF MARYLAND,

Baltimore City, to wit:

I Hereby Certify that the foregoing is a true Copy of the Docket entries in the aforesaid case, taken and copied from the record of proceedings of the Criminal Court of Baltimore.

In Testimony Whereof, I hereto set my hand and affix the seal of the Criminal Court of Baltimore, this *26th* day of ~~A. D., 19~~ *March 1926* day of

Edward Gross
Clerk Criminal Court of Baltimore.

Ct. Ct.

32

1926

No. B66 Docket

Oliver Brown

vs.

Maggie Brown

MOTION FOR HEARING

B No. 30324
(8)

Filed 1st day of July 1926

I. S. Roger

Damon &
Evan

Oliver Brown

vs.

Maggie Brown

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The *Defendant* by *Linwood G. Koger*

her Solicitor, applies to have the above entitled cause placed on the Trial Calendar
for hearing *on alimony and counsel fees*

in conformity with the First Equity Rule.

Solicitor for *Defendant*

Serve on
Davis & Evans

215 W Paul

Service admitted
this 6th day of July
1926.

Davis & Evans.

Ct. Ct.

32
192 6 No. B-66 Docket

Brown

vs.

Brown

NOTICE OF HEARING

B- No. 30324
(9)

No.

Filed 1st day of July 1926

H

Copy of the within notice served on Davis and Evans,
Solicitors on the 6th day of July, 1926, in the presence
of John Moylan.

John E. Potee
Sheriff

New \$1.50

Oliver Brown

vs.

Maggie Brown

IN THE

CIRCUIT COURT

OF BALTIMORE CITY

Upon application made by the Solicitor for the

Defendant

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 ~~and~~ Counsel fee

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

CIRCUIT COURT

33
1926 B

No. 66 Docket.

Oliver Brown

vs.

Maggie Brown

Final Order, Counsel Fee and Alimony

Pendente Lite.

No. 30324 B

(10)

Filed 13th July 1926

Oliver Brown
vs.
Maggie Brown

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

July

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 12th day of July 1926, that the Plaintiff pay to the Defendant the sum of ~~Six~~ Twenty-five Dollars, as counsel fee for the Solicitor of the Defendant and that he further pay the sum of Six Dollars per week, to the said Brown as Alimony *pendente lite* accounting from the 12th day of July 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 payovers and assets
deposited