

3/12/14/21

10-10-1922

IN THE
CIRCUIT COURT NO. 2
OF
BALTIMORE CITY

SUMINA B. QUILL,
Complainant,

vs.

NATHANIEL J. QUILL,
Respondent.

1219 Orleans St.

BILL OF COMPLAINT.

Mr. Clerk: Please file.

No 220,20 B.

Charles W. Main
Solicitor for Complainant.

CHARLES W. MAIN
ATTORNEY AND COUNSELLOR AT LAW
LAW BUILDING
BALTIMORE, MD.

FILED *21 September 1922*

SUMINA B. QUILL, : IN THE
Complainant, :
vs. : CIRCUIT COURT NO.2
NATHANIEL J. QUILL, : OF
Respondent. : BALTIMORE CITY

~~TO THE HONORABLE, THE JUDGE OF SAID COURT:-~~

The Complainant, Sumina B. Quill, respectfully represents to the Court as follows:-

FIRST: That the Complainant and the Respondent were married in the City of Baltimore, State of Maryland, on the 8th day of August, 1907, by the Rev. Josiah Dixon, a regularly ordained Minister of the Gospel of the Methodist Church.

SECOND: That both the Complainant and the Respondent are residents of the City of Baltimore, State of Maryland, and have resided in said City and State for more than two years last past.

THIRD: That no children were born to the union of the parties to this suit.

FOURTH: That on or about the 6th day of April, 1919, the Respondent, the said Nathaniel J. Quill, deserted and abandoned the Complainant and declared his intention to live with her no longer; that the Respondent, the said Nathaniel J. Quill, has been guilty of the crime of adultery with one Mary Gaskins and also with one Carrie Mills; that on or about the 6th day of April, 1919, this Complainant objected to the Respondent's relations with Carrie Mills, and the Respondent, the said Nathaniel J. Quill, ~~drove this Complainant out of their house; that she~~ has not lived nor cohabited with the Respondent since she became aware of his misconduct, nor has she in any way forgiven or condoned his said adulterous acts.

FIFTH: That the Respondent, the said Nathaniel J. Quill, is employed in Baltimore City and earns a salary of from Twenty to Twenty-five Dollars per week.

WHEREFORE, the premises considered, the Complainant prays as follows:-

(a) That she may be divorced a vinculo matrimonii from the Respondent, the said Nathaniel J. Quill, her husband.

(b) That she may be awarded a suitable sum as alimony pendente lite, and also a suitable sum as counsel fee for her solicitor.

(c) That she may have such other and further relief as the Court may deem meet and proper and as the exigencies of her case may require.

MAY IT PLEASE YOUR HONOR, to grant unto the Complainant the writ of subpoena, directed to the Respondent, the said Nathaniel J. Quill, who resides in Baltimore City, State of Maryland, commanding him to be and appear in this Honorable Court on some certain day to be named therein, to answer the premises and abide by and perform such decree as may be passed therein.

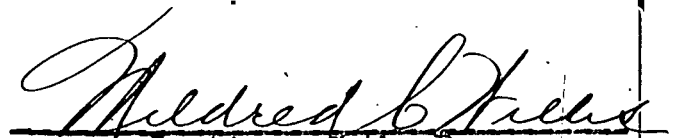
And as in duty bound, etc.


Solicitor for Complainant.


Complainant.

STATE OF MARYLAND, CITY OF BALTIMORE, To wit:-

I HEREBY CERTIFY, That on this 21st day of September, 1922, before me, the subscriber, a Justice of the Peace, of the State of Maryland, in and for the City of Baltimore, aforesaid, personally appeared Sumina B. Quill, Complainant in the foregoing Bill of Complaint, and she made oath in due form of law that the matters and facts set forth therein are true to the best of her knowledge, information and belief.


Justice of the Peace.

370-389
Ct. Ct. No. 2

462
1922

B Docket No. 31

Luell

vs.

10/16/22 (3)

Luell

Subpoena to Answer Bill of Complaint

Per

No. 22020B
2-4

Copied & copied
18 October 1922
9 October 1922
Filed Charles H. Main, 1922
Solicitor.

3

Thomas F. McMurtry
Sheriff

Now Est
(Cinchester)

REISSUED TELEPHONELY RETURN DAY, 1922
14 October 1922
John Pleasants
CLERK

Summoned and a copy of the process left
with the defendant

Thomas F. McMurtry
Sheriff

Fees \$0.80

EQUITY SUBPOENA
The State of Maryland

To

Nathaniel J. Quill
1219 Ocean St

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

Summa B. Quill

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 JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the *14* day of *December*, 192*2*

Issued the *21* day of *September*, in the year 192*2*

John Pleasant

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.)

SERVE ON

Nathaniel J. Quill
1219 Orleans St.

B ⁴⁶²/₁₉₂₂ Docket ³¹
Circuit Court No. 2

Quill

vs.

Quill

Order Counsel Fee and Alimony
Pendente Lite

ORDER

No. 22020 B.
3-6

Copy copied
Copy order - ~~copied~~

31 October 1922
14 October 1922

Filed 2nd September 1922

3

Now let
(Finkelstein)

2nd Return

Thomas F. Mully
Sheriff

Copy of the within Order of Court served on
Nathaniel J. Quill on the 16th day of October
1922, in presence of Morris Finkelstein

Thomas F. Mully
Sheriff

Fees \$0.50

Summa B. Quill

IN THE
CIRCUIT COURT No. 2

vs.

OF

Nathaniel J. Quill

BALTIMORE CITY

September TERM, 19*22*

ORDERED BY THE COURT, this *22nd* day of *September*, 19*22*,

that the defendant *Nathaniel J. Quill*

pay to the plaintiff *Summa B. Quill*

the sum of *eight*

Dollars per week, during the continuance of this suit as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the *7th*

day of *October*, 19*22*, provided a copy of this Order be served on the said defendant

Nathaniel J. Quill on or before the *27th*

day of *September*, 19*22*, the question of Counsel fee being reserved for the

further determination of this Court. *Charles F. Owen*

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 *14* day of *October*, 19*22*, that the time for showing cause

under said Order be extended to the *26* day of *October*, 19*22*,

and the time for service of a copy of the same be extended to the *16th* day of

October, 19*22*. *Charles F. Owen*

A copy of the foregoing Order having been served upon the *Defendant*

as is shown by the Sheriff's return hereon, and no cause to the contrary having been shown, it is this

31 day of *October*, A. D. 19*22*, Ordered by the Circuit Court No. 2 of

Baltimore City, that the above Order be and the same is hereby made absolute and final.

Charles F. Owen

SERVE ON

Nathaniel J. Quill

1219 Orleans Street

Baltimore, Md.

CT. CT. No. 2.

31, B 462
1922

Sumina B. Quill

vs.

Nathaniel J. Quill

ORDER OF COURT NISI
For Contempt

Order:

No. 22020 B.

Copy = copied

Filed 14 December, 1922

Copy of the within Order of Court served on Nathaniel J. Quill on the 12th day of December 1922 in the presence of Morris Finckelstein

Thomas J. Mc Nulty
Sheriff

Fee \$0.50

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Sumina B. Quill

vs.

Nathaniel J. Quill

IN THE
Circuit Court No. 2

OF

BALTIMORE CITY.

Ordered by the Circuit Court No. 2 of Baltimore City this 11 day of December, 1922
that the December Defendant appear before this Court in person,
on the 15 day of December, 1922, 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 31 day of October, 1922,
directing the payment of Alimony, pendente lite, by him to the Plaintiff; provided, a
copy of this Order be served on the said Defendant on or before the 14th day
of December, 1922.

[Signature]

Judge

True Copy: Test

Clerk.

Ct. Ct. No. 2

462

1942

DOCKET No. 31

Summa Quid

vs.

Quid

ORDER FOR APPEARANCE

No. 22020 B

8

Filed 15 day of Dec 1942

Summa Quil

vs.

Quil

In the Circuit Court No. 2
of Baltimore City.

..... TERM, 191

MR. CLERK:

PLEASE ENTER MY APPEARANCE FOR DEFENDANT.

J. Steward Davis

Solicitor.

Ct. Ct. No. 2 31 B. ⁴⁶²₁₉₂

Sumina B. Gill

vs.
Nathaniel J. Gill

Final Order, Counsel Fee and Alimony
Pendente Lite,

No 22020 B.
9

Filed *19* *September* 19*22*

Sumina B. Gill
Plaintiff
vs.
Nathaniel J. Gill
Defendant

IN THE
CIRCUIT COURT No. 2
OF
BALTIMORE CITY

The petition for Alimony pendente lite and Counsel fee and the answer thereto in the

above entitled cause coming on for final hearing and the respective parties having been heard;

It is Ordered by the Circuit Court No. 2 of Baltimore City this 19th day
of December 1922, that the Defendant, Nathaniel J. Gill,

~~pay to the~~

~~the sum of~~ _____ Dollars, as Counsel Fee

~~for the Solicitor of the~~ _____ and that he

~~further~~ pay the sum of Six _____ Dollars per week,

during the continuance of this suit, to the said Plaintiff, Sumina B. Gill

as Alimony pendente lite accounting from the 15th day of December 1922

*Payments to be made
through the Maryland
Prisoners' Aid Assn.
Ciation.*

Over Bond