

IN THE CIRCUIT COURT OF
BALTIMORE CITY

B 431
1926

SARAH STANLEY
RECORDED IN LIBER.

C. R. W. No. 128 VS. FOLIO 472

JAMES G. STANLEY
1812 E. Madison St.

(1)

BILL FOR DIVORCE

B 31087

Mr. Clerk:-

(1)

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

Filed 30 Sept 1926.

SARAH STANLEY

:

IN THE CIRCUIT COURT

VS.

:

OF

JAMES G. STANLEY

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully says:

- I. That she was married to her husband, James G. Stanley, Dec. 18, 1907 in Baltimore City and with whom she resided until the 15th day of December, 1921 when the defendant deserted the plaintiff.
2. That though the conduct of your Oratrix toward the said James G. Stanley, 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 four children born as result of said marriage; James F., eighteen years of age; Leon W., sixteen years of age, Gladys M., fourteen years of age and Virginia D., ten years of age 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 pendente lite and a certain sum to compensate her Solicitor. The defendant is employed and earns thirty-five dollars per week.

✓
5. That both your Cratrix and 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.

% That your Oratrix and the respondent are owners of 1239 McElderry St., this City, as tenants by the entireties. That by virtue of the above and other irreconcilable differences, the parties to this suit are unable to arrive to any reasonable common understanding as to the use, enjoyment or disposition of the aforementioned joint property. That the said property was purchased in the year 1920 for the price of \$2040; that \$300 was the amount of the cash payment, \$265 of which represented the savings of your Oratrix; that on or about the 25th day of September, 1924 the respondent discontinued any contributions on account of the weekly installments due on the mortgage for balance of purchase money of aforementioned joint property; that your Oratrix has been forced to contribute solely all amounts necessary for the repair and upkeep of the aforementioned property; that at the time that the respondent discontinued his contributions towards the expenses of the aforementioned joint property, there was due and owing \$171.95 for improvements to the aforementioned joint property.

8. That the respondent was ordered by the Criminal Court of Baltimore City in July, 1925, to pay your Oratrix ten dollars and fifty cents per week for the support of herself and minor children; that since July 1926 he has discontinued paying \$10.50 per week and has made irregular payments of varying amounts.

TO THE END, THEREFORE:

(a) That a receiver or receivers may be appointed by this Honorable Court to take charge of all the joint property 1239 McElderry St. in order to properly preserve same during the pendency of this suit.

(b) That a trustee may be appointed with power and authority to sell same property and out of the proceeds realized, to reimburse your Oratrix for the amounts expended by your Oratrix on account of repairs, improvements, mortgage loan or any other expenditure made by your Oratrix on account of said joint property; and further reimburse your Oratrix for money advanced for the support of the minor children born as result of the marriage of your Oratrix and respondent; then to divide the balance remaining, after payment of legal charges and costs, between your Oratrix and the respondent.

(c) Alimony in such sum as the Court may decree, during the pendency of this suit and a sum to compensate her Solicitor. ✓

(d) Custody of the four children. ✓

(e) Such other and further relief as the case may require.

May it please your Honor to grant unto your Oratrix the Writ of Subpoena directed against the said James G. Stanley, 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 or order as may be passed therein.

AND as in duty bound, etc.

Sarah S. Stanley
Plaintiff

Davis + Evans
SOLICITOR FOR PLAINTIFF.

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this 29th day of September, in the year one thousand nine hundred and twenty six, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City aforesaid, personally appeared Sarah Stanley and made oath in due form of law that the matters and facts in the foregoing Bill of Complaint are true to the best of her knowledge and belief.

WITNESS my hand and Notarial Seal.



NOTARY PUBLIC.

Part of the
case is put
away for Record

P 741

B 431

Ct. Ct.

192 6 Docket No.

Sarah Stanley

vs

James B. Stanley
1812 E Madison St

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

1331087
(2) (2)

Filed 11 Oct, 1926

Davis and Evans
SOLICITOR

6

Summoned James B. Stanley, and a copy of the Process with a copy of the Bill of Complaint served on the defendant, on the 7th day of October 1926 in presence of Michael H. McKinley.

John E. Potee
Sheriff

Geo J. W.

EQUITY SUBPOENA

The State of Maryland

To

James G. Stanley
#1812 E. Madison 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

Sarah Stanley

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 *13th* day of *September* 192 *6*
Issued the *30th* day of *September*, 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.

431
1926
IN THE -- B 431
CIRCUIT COURT --- 1926.
BALTIMORE CITY.

SARAH STANLEY

VS.

JAMES G. STANLEY.

B 31087

- DEMURRER -

(3) (4)

Mr. Clerk:

Please file &c.,

RMS Bond
SOL. FOR-DEPENDANT.

ROY S. BOND
ATTORNEY AT LAW
220 ST. PAUL PLACE
BALTIMORE, MD.

FILED 20 Oct 1926
11 3 Jan 1927

THE DAILY RECORD COMPANY
Baltimore, Md.

SARAH STANLEY

IN THE ---

VS.

CIRCUIT COURT ---

JAMES G STANLEY

BALTIMORE CITY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

The said James G. Stanley- demurs to the Bill of Complaint, heretofore filed by the Plaintiff, Sarah Stanley, and for the cause of demurrer shows:

1. That she has not stated in her Petition such a case as entitled her any relief in equity.

2. That the cause stated in the Petition is not sufficient in substance to sustain the same.

3. Because the cause stated is general, vague and indefinite.

4. Because of other reasons apparent upon the face of the proceedings.

5. Because of other reasons to be made known at the hearing.

AS IN DUTY bound, etc.

James G. Stanley
Defendant.

Raymond Bond
Sol- for- Defendant.

1/2/27

Demurrer overruled because a general demurrer to which bill can ground to defendant to demur to any separate paragraph or paragraph or to answer as to way to answer; bill within five days
Charles F. Steen

STATE OF MARYLAND
BALTIMORE CITY to wit-

I HEREBY CERTIFY that on this
day of 18th 1926, before me, the subscriber,
" a Notary Public, of the State of Maryland, in and
for Baltimore City, personally appeared- JAMES G.
STANLEY, defendant, in the above entitled cause, and
made oath in due form of law, that the demurrer filed
by him, is not intended for delay.

AS WITNESS MY HAND AND NOTARIAL SEAL.

Clemens J. Wright
Notary Public.

Davis and Evans

66B-431

Ct. Ct.

192

No.

Docket

Sarah Stanley

vs.
John Stanley

MOTION FOR HEARING

X
B 31087
(4)

No.

Filed 23 day of Oct 1926

Roy S. Bond

Sarah Stanley

vs.

John Stanley

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The *complainant* by *Davis & Evans*

her

Solicitor applies to have the above entitled cause placed on the Trial Calendar

for hearing *on demurred*

in conformity with the First Equity Rule.

Davis & Evans

Solicitor for

complainant

Serve on
R. S. Bond

Service admitted-

October 26th, 1926.

R. S. Bond

220
St Paul

Ct. Ct.

431
192 6 No. B-66 Docket

Stanley

vs.

Stanley

NOTICE OF HEARING

~~()~~
B-No. 31087
(5)

No.

Filed 23 day of Oct. 1926

H

*Copy of the within Notice served on R. S. Bond,
Solicitor on the 26th day of October, 1926, in
the presence of Louis Hecht.
Per \$0.50 John E. Potee
Hecht*

Sarah Stanley

vs.

John Stanley

IN THE
CIRCUIT COURT
OF BALTIMORE CITY

Upon application made by the Solicitor for the

Complainant

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 demurrer

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

Service admitted
January 5th, 1927.

*Raymond
Sol for def.*

IN THE CIRCUIT COURT OF

BALTIMORE CITY

*434
1926*

SARAH STANLEY

VS.

JAMES G, STANLEY

AMENDED BILL

B 31087

MR. Clerk: *(8)*

~~Please file.~~

Davis & Evans

Attorneys for plaintiff

DAVIS & EVANS
ATTORNEYS AT LAW

Jan 5 1927

SARAH STANLEY : , IN THE CIRCUIT COURT

VS. : OF

JAMES G. STANLEY : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix respectfully says:

I. That on or about the 30th day of *sept* 1926 she filed a bill in this Honorable Court alleging among other things, desertion and non support and praying certain reliefs.

2. That she desires to amend said bill of complaint by adding the following prayer to be known as "F". *and "G"*

(f) That she may be divorced A Vinculo Matrimonii from the said James G. Stanley.

(G) permanent alimony

David T. Evans
SOLICITORS FOR PLAINTIFF

Ordered by the Circuit Court of Baltimore City this 5th
day of January, 1927 that the bill be and the same is hereby amend-
ed as prayed provided a copy of this order be served on the de-
fendent or his counsel on or before the 7th day of January 1927.

Crithan

RECEIVED AT
THE SHERIFFS OFFICE ON

JAN 6 1927 | 37 PM

B Docket 431
1926

CIRCUIT COURT.

Sarah Stanley
vs
James G. Stanley
1812 E Madison St

Order for Alimony

Pendente Lite

ORDER

B No.

31088
() ~~6~~ (8 1/2)

Fd:

6 January 1927
~~8 December 1926~~
6

*Copp. of the within Order of Court, served on
James G. Stanley, on the 8th day January 1927.
in presence of Michael W. McKinley.*

*John E. Potee
Sheriff*

New \$0.50

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

Sarah Stanley
vs.
James G. Stanley

November TERM, 1926

ORDERED BY THE COURT this *6* day of *January* 192*7*

that the defendant *James G. Stanley*

pay to the plaintiff *Sarah Stanley*

the sum of ~~*Twelve*~~ *Eighteen*

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

day of *January* 192*7* to the said plaintiff *Sarah Stanley*

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

day of *January* 192*7* provided a copy of this Order be served on the said defendant

James G. Stanley on or before the *14th*

day of *January* 192*7*

critch

TRUE COPY—TEST:

CLERK

431

IN THE
CIRCUIT COURT OF
BALTIMORE CITY.

B431
1927

SARAH STANLEY

VS.

JAMES G. STANLEY.

-ANSWER-

B31087

297 (5)

MR: CLERK:

PLEASE FILE &c.,

Roy S. Bond
SOL. FOR DEFENDANT.

ROY S. BOND
ATTORNEY AT LAW
220 ST. PAUL PLACE
BALTIMORE, MD.

FILED

14 Jan 1927

SARAH STANLEY
VS.
JAMES G. STANLEY

IN THE
CIRCUIT COURT OF
BALTIMORE CITY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

Your Respondent, James G. Stanely, in answer to bill of divorce, A Vinculo Matrimonii, the Amended Bill and the petition for Alimony and Counsel fee heretofore filed against him, respectfully says:

- (1). He admits that he was married to his wife, Sarah Stanley, December, 18th, 1907, in Baltimore City, State of Maryland, but most emphatically denies he deserted his wife, on the 15th day of December, 1921.
- (2). That he denies the allegations contained in paragraph TWO--.
- (3). That he denies the allegations contained in paragraph THREE.
- (4). He admits paragraph four, but further in answer says that the two older children mentioned in these proceedings are self-sustaining.
- (5). He denies the allegations contained in paragraph FIVE, and to the contrary says that his wife, Sarah Stanley, occupys their home; large amounts of money having been contributed by your Respondent to pay for the same. That his wife is not destitute, and to the contrary says that she has everything that is necessary for the confort of a wife in her station of life. He absolutely denies that he earns THIRTYFIVE(\$35:00) DOLLARS, and says that he is only a day laborer in humble circumstances endeavoring to make an honest living whenever he can find work to do.
- (6). He admits the allegations contained in paragraph SIXTH.
- (7). He respectfully demurrs to paragraph SEVEN, said demurrer having already been sustained by this Honorable Court.
- (8). He demurrs to paragraph EIGHT.

Having answered in so far, as he is advised is necessary, he respectfully prays that the Original Bill, the Amended Bill, and the Petition for Alimony and Counsel fee heretofore filed by his wife, Sarah Stanley, be dismissed

and the order thereon vacated.

AS IN DUTY BOUND, etc.,

James G. Stanley

DEFENDANT.

W. J. Bond

SOLICITOR FOR PLADEFENDANT.

STATE OF MARYLAND- BALTIMORE CITY - to wit-

I HEREBY CERTIFY that on this *17th* day
of January, 1927, before me, the subscriber, a Notary
Public of the State of Maryland, in and for Baltimore
City, personally appeared- *James G. Stanley*
defendant, and made oath in due form of law, that the
matter and facts set forth in this, his answer, are
true to the best of his knowledge and belief.

Eleanora Strigler

NOTARY PUBLIC.

Davis + Evans

66B
1926

Ct. Ct.

No. 431 Docket

Sam Stanley

vs.

James Stanley

MOTION FOR HEARING

B 31087
(9/17)

No.

X

Filed 19 day of Jan 1927

Roy S Bond.

Sarah Stanley

vs.

James Stanley

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The *plaintiff* by *Dans Evans*

her Solicitor, applies to have the above entitled cause placed on the Trial Calendar

for hearing *on always per late v*

counsel fee

in conformity with the First Equity Rule.

Dans Evans

Solicitor for

plaintiff

Serve on

R.S. Bond

Jan 21, 26
[Signature]

Ct. Ct.

431
192 6 No. B-66 Docket

Stanley

vs.

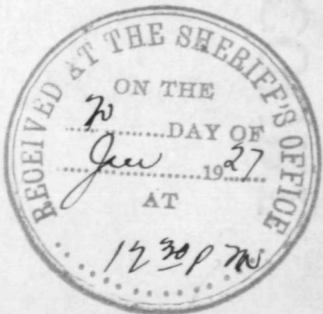
Stanley

NOTICE OF HEARING

B- No. 31087

No.

Filed 19 day of Jan. 1927



*Copy of the within notice received on Ray S. Bond,
Solicitor on the 21st day of January, 1927, in the
presence of Louis H. H. [unclear] John E. Foley
Sheriff*

Dec 10.50

H

214
St Paul

Sarah Stanley

vs.

James Stanley

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 and counsel fee

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

Circuit Court

431
1926 B 66 No. Docket

Sarah Stanley

VS.

James G. Stanley

Final Order, Counsel Fee and Alimony
Pendente Lite.

X

B No. 31087 B
(10)

Filed 24 Jan 1927

HOWARD LEDGER

HOWARD LEDGER

IN THE
Circuit Court
OF
BALTIMORE CITY.

Sarah Stanley
vs.

James G. Stanley

Jan Term, 19*27*

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 *24th* day of *Jan* 19*27*, that the *James G. Stanley,* defendant, pay to the *plaintiff; Sarah Stanley,* the sum of _____ Dollars, as counsel fee for the Solicitor of the _____ and that he further pay the sum of *Seven (\$7⁰⁰/₁₀₀)* Dollars per week, to the said *Plaintiff* as Alimony **pendente lite** accounting from the *17th* day of *Jan* 19*27* and continuing until the _____ day of _____ 19____, (should this suit be so long pending) or until the further order of this Court.

Payable through the prison aid association.

H. Arthur Strump

CIRCUIT COURT

431
1926

Docket No. 1366

Sarah Stanley

vs.

James G. Stanley

Order

B 31087 19

(11)

Petition for leave to take
Testimony and Order
of Court thereon.

No. X

< >

Fd

27 Jan 1927

Sarah Stanley

vs.

James G. Stanley

IN THE
Circuit Court
OF
BALTIMORE CITY

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

THE PETITION OF *Sarah Stanley*

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.

Dwight Boone
Solicitor for *plaintiff*

ORDERED, this *27* day of *January* 19*27*, 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

431
1926

CIRCUIT COURT

B431-592

192 6 Docket No.

Sarah Stanley

vs.

James G. Stanley

ORDER OF APPEARANCE

Mr. Clerk

X

Please File

Arthur C. Brice

Sol. for defendant

B No. 31087

(2)

Filed 1 day of Feb 1927

Sarah Stanley

vs.

James G. Stanley

IN THE
Circuit Court

OF

BALTIMORE CITY

January Term, 192*7*

Mr. WHITEFORD, Clerk.

Enter my appearance for Defendant

Arthur E. Briscoe

Solicitor

IN THE
CIRCUIT COURT OF
BALTIMORE CITY.

431
1926

431-592
1926

SARAH STANLEY

VS.

JAMES G. STANLEY.

PETITION AND ORDER.

1331087

(13) (14) 6
Mr: Clerk:

Please file &c.,

Roy S. Bond

Sol. for Defendant.

ROY S. BOND
ATTORNEY AT LAW
220 ST. PAUL PLACE
BALTIMORE, MD.

FILED

Feb 1st 1927

SARAH STANLEY

IN THE

VS.

CIRCUIT COURT OF

JAMES G. STANLEY

BALTIMORE CITY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

The Petition of JAMES G. STANLEY, respectfully shows:

I.

That he and the said Sarah Stanley, are the owners as tenants by the entireties of the leasehold property No. 1239 McElderry Street, Baltimore, Maryland, subject to an annual ground rent of \$ 22:40.

II.

That by agreement in writing between your Petitioner, and said Sarah Stanley, they have determined to have George W. Evans and Roy S. Bond, appointed Receivers to sell said property in the manner set forth in said agreement, original of which is attached hereto as part hereof.

WHEREFORE your Petitioner prays that this Court may pass a proper order in the premises.

AS IN DUTY BOUND, etc.,

James G. Stanley

Petitioner.

Roy S. Bond

Solicitor for Petitioner.

UPON THE foregoing Petition and Exhibit, it is this ^{12th} day of *February* 1927, by the Circuit Court of Baltimore City, in the above entitled matter, ORDERED that George W. Evans and Roy S. Bond, be, and they are hereby appointed Receivers to make sale of the leasehold property, No. 1239 McElderry Street of Baltimore, Maryland, subject to the annual ground rent of \$ *22.40 yearly*, either at public or private sale, in their discretion, and after payment of the balance due on the existing mortgage on said property, the expenses of sale and commissions to said Receivers, the balance is to be divided equally between Sarah Stanley and James G. Stanley, that is to say one-half thereof to said Sarah Stanley and one-half to said James G. Stanley, and it is further agreed that an allowance of \$193:97, for repairs be allowed Sarah Stanley, from the one-half portion of James G. Stanley; this amount being one-half of total repairs made by the wife. It is further ordered that said Receivers shall file a *personal* bond in the sum of *Four thousand* dollars, for the faithful performance of their duties herein.

I hereby consent to the passage of this order.

James P. Gorter
James P. Gorter

Sol. for Sarah Stanley.

SARAH STANLEY , IN THE
VS. - CIRCUIT COURT OF -
JAMES G. STANLEY , BALTIMORE CITY.

S T I P U L A T I O N

IT IS AGREED by and between the parties to the above case as follows:

That George W. Evans and Roy S. Bond, shall be appointed Receivers by this Court, to make sale of the leasehold property- No. 1239 McElderry Street, Baltimore, Maryland, owned by the parties hereto, and after deducting the expenses of a public or private sale, in their absolute discretion, and the payment of the balance due on the existing mortgage on said property, including the payment to said Receivers of the usual commissions in such cases, the balance to be equally divided between said Sarah Stanley and James G. Stanley, that is to say one-half to said Sarah Stanley and one-half to said James G. Stanley.

AND IT IS FURTHER AGREED that an allowance of One Hundred Ninetythree (\$193.97) Dollars and ninetyseven cents, for repairs, be allowed ~~to~~ SARAH G. STANLEY, from the one-half portion of JAMES G. STANLEY; this amount being one-half of total repairs made by the wife.

Sarah S. Stanley

Complainant.
James G. Stanley

Defendant.

J. Stewart Daul

Sol. for Complainant.
Roy S. Bond

Sol. for Defendant.

Bond
Book 24
Folio 103

(15)

(7)

Feb 8 Feb 1927

Sarah Stanley
vs.

James G. Stanley

IN THE
Circuit Court
OF
BALTIMORE CITY

To The Honorable

Judge of the Circuit Court of Baltimore City:

Receivers The Report of Sale of *Boys Bond & George W. Evans*
~~Trustee~~ appointed by the decree in the above entitled cause, to make sale of

1239 McElderry St

in the proceedings in said cause mentioned, respectfully shows, that after giving bond with security for the faithful discharge of *their* trust as prescribed by said decree, which was duly approved, and having given notice of the time, place, manner and terms of sale, by advertisements inserted in

The Daily Record

a daily newspaper published in Baltimore City for more than three successive weeks preceding the day of sale, said ~~Boys Bond~~ *Boys S. Bond & George W. Evans* did pursuant to said notice on *Monday* the *28* day of *February* 19 *27* at *3* o'clock P. M., attend on the premises and then and there sold

1239 McElderry St. at public auction, to Sarah Stanley for \$2200.00 (Twenty two hundred dollars)

Boys S. Bond
George W. Evans
RECEIVERS.

State of Maryland, City of Baltimore, Sct:

I Herely Certify, That on this *2nd* day of *March* 19*27* before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared *Boys S. Bond and George W. Evans* ~~Trustee~~ *Receivers* and made Oath that the facts stated in the foregoing Report of Sale are true, as therein set forth, and that the sale thereby reported was fairly made.

As witness my hand and Notarial Seal,

Nolan C. Fisher

Notary Public.



66B-1131 No. B 431 Docket
1926 1926

Irish Stanley
vs.

James G. Stanley

REPORT OF SALE

Mr. CHARLES R. WHITEFORD, Clerk,
Please file

⑧

No. B 31087

[16]

Filed 2 March 19 27



Roy S. Bond, Solicitor,
220 St. Paul Street.

Arthur E. Briscoe, Solicitor,
14 East Pleasant Street.

Davis & Evans, Solicitors,
215 St. Paul Place.

RECEIVER'S SALE OF VALUABLE

LEASEHOLD PROPERTY

No. 1239 McELDERRY STREET

By virtue of an order of the Circuit Court of Baltimore City, the undersigned, Receivers, will sell at public auction, on the premises, on

MONDAY, FEBRUARY 28, 1927,
AT 3 O'CLOCK P. M.,

ALL THAT LOT OF GROUND AND IMPROVEMENTS lying in the City of Baltimore and described as follows:

Beginning for the same on the line of the south side of McElderry street at the distance of eighty-three feet westwardly from the corner formed by the intersection of the south side of McElderry street and the west side of Central avenue running thence southerly parallel with Central avenue fifty feet eight inches more or less to the most southerly line of the ground conveyed by George Douglass and wife to a certain Daniel Zollickoffer, trustee, (E. D. No. 51, folio 334, etc.) thence westerly parallel with McElderry street sixteen feet more or less to the east line of the lot heretofore leased by Daniel Zollickoffer, trustee, et al. to William Sutton (E. D. No. 25, folio 36, etc.) thence northerly parallel with Central avenue fifty feet eight inches more or less to McElderry street, and thence easterly binding on the south side of McElderry street to the place of beginning. Subject to an annual ground rent of \$22.40 and improved by a **THREE-STORY BRICK DWELLING.**

Terms of Sale: Cash upon ratification of the Circuit Court of Baltimore City. A deposit of \$300 will be required of the purchaser at the time and place of sale. All expenses to be adjusted to day of sale.

ROY S. BOND,
GEORGE W. EVANS,
Receivers.

O. T. BUTTERWORTH & CO.,
f14,21,28 Auctioneers.

preside.

THEATRE NOTES.

Pat Rooney, Marion Bent and Pat Rooney 3d, in a miniature revue called "Rooneyisms of 1927-28," headline the Keith-Albee vaudeville bill at the Maryland this week. They will be assisted by a company of ten. The act is made up principally of dancing, with Rooney, Sr., displaying his old-time form in jigs, clogs and soft-shoe steps.

The rest of the bill is as follows: Edith Clifford, singing comedienne, assisted by Marion Carr at the piano; Bert Errol, an English female impersonator; Henry Regal, a comic gymnast; Val Harris and Vera Griffin, presenting a return engagement of "The Sheik of '61"; Kitty O'Connor, "the girl barytone," and her sister, Pat, and the Andresens, who will present a balancing act.

"What Price Glory," the motion picture based on the stage play of the same name by Laurence Stallings, former captain of marines, and Maxwell Anderson, the playwright, is held over at the Auditorium for the second and final week. The story has to do with the activities during the World War of a detachment of marines in general and of Captain Flagg and Sergeant Quirt in particular. Victor McLaglen, Edmund Lowe and Dolores Del Rio have leading roles.

"Ben Hur," the spectacular movie adaptation of the famous old play and novel by Gen. Lew Wallace will be seen at Ford's this week. The picture was made partly over here, partly over in Italy and partly in natural colors. Ramon Novarro is cast as the son of the house of Hur and is called upon to engage in many perilous adventures. Francis X. Bushman has the role of Messala.

#

B 431

Ct. Ct.

1926

No.

Docket

Sarah Stanley

vs.

James G. Stanley

ORDER NISI ON REPORT OF SALES

B 31087

No.

(9)

Filed 2 March 1927

[Order Nisi]

Sarah Stanley

vs.

James G. Stanley

IN THE
Circuit Court
OF
BALTIMORE CITY

ORDERED, by the Circuit Court of Baltimore City this 2nd day
of March 1927, that the Sale of the
property mentioned in these proceedings, made and reported by

Roy S. Bond & George M. Evans

Receivers ~~DECEASED~~

be RATIFIED AND CONFIRMED, unless cause to the contrary thereof be shown on or
before the 2nd day of April 1927. Provided, a copy of
this order be inserted in some daily newspaper printed in Baltimore City, once in each of
three successive weeks, before the 26th day of March 1927.

The Report states the amount of sale to be
\$ 2200.00

Chas. R. Whitford

True Copy.

Test: Clerk.

192.....

Docket No. 431
1926

Stanley

vs.

Stanley

Certificate of Publication

(10)

B 31087

(18)

THE DAILY RECORD
Filed 5 day of April 1927.

THE DAILY RECORD

Roy S. Bond, Solicitor,
220 St. Paul Street.

IN THE CIRCUIT COURT OF BALTI-
MORE CITY — (B — 431 — 1926) — Sarah
Stanley vs. James G. Stanley.

Ordered by the Circuit Court of Balti-
more City this 2nd day of March, 1927,
that the sale of the property mentioned in
these proceedings, made and reported by
ROY S. BOND and GEORGE M. EVANS,
receivers, be ratified and confirmed, un-
less cause to the contrary thereof be shown
on or before the 2nd day of April, 1927;
provided, a copy of this order be inserted
in some daily newspaper printed in Balti-
more City, once in each of three succes-
sive weeks, before the 26th day of March,
1927.

The report states the amount of sale to
be \$2,200.

CHAS. R. WHITEFORD,
True Copy—Test: Clerk.
CHAS. R. WHITEFORD,

Baltimore, th March 17, 1927

We hereby certify that the annexed advertise-
ment of Order Nisi Circuit Court

of Baltimore City, Case of Sarah
Stanley
vs. James G. Stanley

was published in THE DAILY RECORD, a daily news-
paper published in the City of Baltimore, once in each of
three successive weeks before the
26th day of March, 1927

First insertion March 3rd, 1927

THE DAILY RECORD
Per Frank J. Mollay

CIRCUIT COURT

B 431

19 26

No.

Docket

Sarah Stanley

vs.

James G. Stanley

Final Order of Ratification on
Trustee's Report of Sale.

Order _____ day of _____ 19

(11)

B No. 31087

(19)

Filed 5th day of April 1927.

Sarah Stanley

vs.

James G. Stanley

IN THE
CIRCUIT COURT

OF

BALTIMORE CITY

Term, 19

ORDERED BY THE COURT, This

5th

day of April 1927 that the _____ sale made and reported by the

Trustee on March 2, 1927

aforesaid be and the same _____ hereby finally Ratified and Confirmed, no cause to the contrary having been shown, although due notice appears to have been given as required by the Order Nisi passed in said cause; and the Trustee allowed the usual commissions and such proper expenses as he shall produce vouchers for to the Auditor.

H. Arthur Stump

IN THE CIRCUIT COURT OF

BALTIMORE CITY

B 431-592

1926.
SARAH STANLEY

VS.

JAMES G. STANLEY

(12)

PETITION & ORDER THEREON.

B 31087

Mr. Clerk:-

(20)

Please file.

R. D. Evans
Davis & Evans

ATTORNEYS FOR PETITIONERS

DAVIS & EVANS
ATTORNEYS AT LAW

Filed 1st June 1927

SARAH STANLEY

:

IN THE CIRCUIT COURT

VS.

:

OF

JAMES G. STANLEY

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

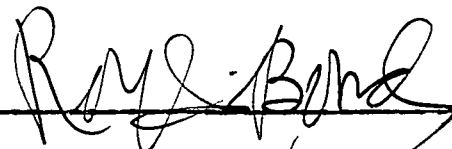
Your petitioners, Roy S. Bond and George W. Evans, Receivers in the aforementioned case, respectfully say:

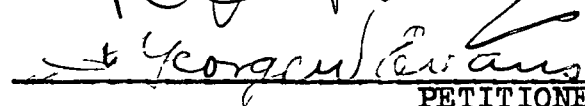
That on or about the 2nd day of March, 1927, they reported the sale of 1239 McElderry St. to one Sarah Stanley.

That the said Sarah Stanley was a co-tenant by the entirety with her husband, James Stanley and that in order to legally transfer title to the said Sarah Stanley, it was necessary for the said tenants by the entireties to transfer title first to a third person, which third person was one Stanley K. Harmon, which Stanley K. Harmon immediately transferred the said property to the said Sarah Stanley.

WHEREFORE YOUR PETITIONERS PRAY:

That the name of Stanley K. Harmon be substituted for that of Sarah Stanley in the report of sale as filed in this Honorable Court March 2, 1927; and that the said substitution of the name of Stanley K. Harmon as purchaser in the matter of the sale of 1239 McElderry St. be as of the 2nd day of March, 1927.





PETITIONERS

Ordered this 1st day of June, 1927 that the name of Stanley K. Harmon be substituted for the name of Sarah Stanley as purchaser of 1239 McElderry St. in the Report of Sale as filed by the Receivers, March 2, 1927 and that the said substitution of the name Stanley K. Harmon as purchaser of 1239 McElderry St. be as of the 2nd day of March, 1927.

H. Arthur Stump

Sol - 1000

Clk - 29.75

Sheriff 230

Sol - 1000

Please add 125
page for a/c.

663-431
1926
B 431-592
1926.

IN THE
CIRCUIT COURT OF
BALTIMORE CITY.

SARAH STANLEY

VS.

JAMES G. STANLEY.

P.O.E

Petition.
B 31087

Mr: Clerk: (13)

Please file &c.,

Roy S. Bond
George W. Evans

ROY S. BOND
ATTORNEY AT LAW
220 ST. PAUL PLACE
BALTIMORE, MD.

FILED 1st June 1927

SARAH STANLEY --

IN THE

VS.

CIRCUIT COURT OF--

JAMES G. STANLEY

BALTIMORE CITY.

TO THE HONORABLE-

THE JUDGE OF SAID COURT:

The petition of ROY S. BOND and GEORGE W. EVANS, receivers, in the above entitled cause, respectfully states that they have fully complied with the order of this Court to make sale of property mentioned in this proceeding, that they have consummated said sale and are ready to state an account.

WHEREFORE they pray that an order be passed referring the papers in the case to one of the Auditors of the Court.

Roy S. Bond
.....
George W. Evans
.....

STATE OF MARYLAND
BALTIMORE CITY to wit-

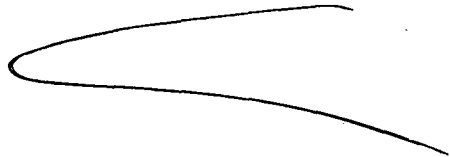
I hereby certify that on this /¹¹ day of June, 1927, before me, the subscriber, a Notary Public, of the State of Maryland, in and for Baltimore City, personally appeared ROY S. BOND and GEORGE W. EVANS, Receivers, and made oath in due form of law, that the matters and facts set forth in this, their petition, are true to the best of their knowledge and belief.

As witness my hand and Notarial Seal.

Helena C. Fisher
.....
NOTARY PUBLIC.

UPON THE AFOREGOING PETITION, AND AFFADAVIT, it is
this /²¹ day of June, 1927, ordered by the Circuit Court of Bal-
timore City that the papers in the above entitled cause, be,
and the same is hereby referred to one of the Auditors of the
Court.

H. Arthur Stump



Let. B $\frac{431}{1926}$

Stanley

vs

Stauley

X

PLAINTIFF EXHIBIT,
EXAMINER, No. 1

B 31087

(23)

FILED WITH THE EXAMINER

the 28 day of Jan. 1927

George Wald Frick
Examiner

Feb 7 June 1927

U. S. GOVERNMENT CLINIC

N. W. COR. CALVERT AND SARATOGA STREETS

HIST. NO.

5118

DATE

2/28/21

FOR MEN (ONLY)

MONDAY AND THURSDAY EVENINGS, 8 TO 9 P. M.

DAILY, 1 TO 2 P. M.

FOR WOMEN (ONLY)

TUESDAY AND FRIDAY EVENINGS, 8 TO 9 P. M.

NAME

Stanley, James G.

ALWAYS BRING THIS CARD WITH YOU

DR.

Heino

B 592
~~B 11~~

Circuit Court

19 26

Docket B

SARAH STANLEY

vs.

JAMES G. STANLEY.

SUBMISSION FOR DECREE.

Mr. Clerk,
Please file,

David Evans

Solicitor for Plaintiff.

No.

B 31087
(24)

Filed

9 June

19 *27*

SARAH STANLEY

JAMES G. STANLEY vs. STANLEY

In the Circuit Court of Baltimore City

MAY----- TERM, 19 27--

To the Honorable

THE

Judge of Said Court:

The above cause is respectfully submitted for decree and the 43rd General Equity Rule is hereby waived.

Davis Evans

Solicitor for Plaintiff,

R.M. Bond

Solicitor for Defendant.

13592

Ct. Ct. No. 2

1926-

Docket No. B--

SARAH STANLEY

vs.

JAMES G. STANLEY.

Order of Reference
and Report

Syons
X

B No. 31087
{25}

Order Filed 9 day of June 1927
Report Filed 27 day of June 1927

SARAH STANLEY

IN THE

Circuit Court No. 2

vs.

OF

JAMES G. STANLEY.

BALTIMORE CITY

Term, 19

This case being submitted, without argument, it is ordered by the Court, this 9th day of June, 1927, that the same be and is hereby referred to Wm Lyons, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

H. Arthur Stump

Report of Auditor and Master

Bill for divorce a vinculo matrimonii, filed by the wife against her husband on the ground of abandonment. Code Art. 16; Sec. 37-42.

Defendant summoned and answered.

Plaintiff's residence in Baltimore City for more than two years prior to the filing of the bill proved.

The marriage proved.

Abandonment uninterruptedly for three years, its finality and the irreconcilability of the parties proved.

Case made for awarding the guardianship and custody of the minor children of the parties to the plaintiff, with the right to the defendant to see said children at reasonable times and places and charging the defendant with the maintenance and support of said children until they become self-supporting.

Thirty days have elapsed since the filing of said bill.

Case submitted for decree and 41st General Equity Rule waived.

Case ready for decree.

William P. Lyons Auditor and Master.

June 21, 1927.

11
CIRCUIT COURT

B -431-
1926 No. Docket

SARAH STANLEY

VS.

JAMES G. STANLEY

Recorded

File 186 1927

Decree of Divorce

B No. 31087
27

Ed 28 June 1927

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

William P. Lyons
Auditor and Master.

Circuit Court

OF

BALTIMORE CITY,

----- SARAH STANLEY -----

VS.

----- JAMES G. STANLEY -----

----- MAY -----

----- Term, 1927 -----

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

It is thereupon, this 28th day of June, A. D. 1927.

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said ----- SARAH STANLEY -----

the above named Complainant be and ^she is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, JAMES G. STANLEY.

AND it is further ordered that the guardianship and custody of JAMES F. STANLEY, LEON W. STANLEY, GLADYS M. STANLEY, and VIRGINIA D. STANLEY, ^{minor children of the parties} be, and the same are hereby awarded to the Complainant, SARAH STANLEY, with the right to the Defendant, JAMES G. STANLEY, to see said said children at all reasonable times and to have said children visit him at reasonable times and places, and said Defendant be, and he is hereby charged with the maintenance and support of said GLADYS M. STANLEY and VIRGINIA D. STANLEY, until they become self-supporting, and shall pay the said Complainant, through the Prisoner's Aid Association, the sum of seven dollars per week, all subject to the further order of this Court.

And it is Further Ordered, That the said ----- Defendant, JAMES G. STANLEY ----- pay the cost of this proceeding.

H. Arthur Stump

3/13/3/14

June 25.

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

not paid B 431-1926

SARAH STANLEY

vs.

JAMES G. STANLEY

B. 31087
[267]

44K15-716

AUDITORS REPORT & ACCOUNT

Order Nisi *14 June* 1927

Final Order *25 June* 1927

Filed *14*
~~25~~ June 1927

⁶⁶
Filed *14 June* 1927

SARAH STANLEY
vs.
JAMES G. STANLEY

)
(
)
(
)
(
)

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

To the Honorable H. Arthur Stump, Judge of said Court:

The Auditor reports to the Court that he has examined the proceedings in the above entitled cause and from them has stated the within Account.

In which the Receivers are charged with amount of their sale as reported and are credited with their commissions, costs of suit and their disbursements as per their vouchers.

The resulting balance is awarded to the parties entitled according to their respective interests.

The Auditor certifies to his employment of three days.

Respectfully submitted,

S. Johnson Poe
Auditor.

IN THE CIRCUIT COURT OF BALTIMORE CITY.

Ordered by the Court this *14th* day of June 1927, that the foregoing Report and Account of the Auditor be ratified and confirmed as stated and reported unless cause to the contrary be shown within ten days of this date.

Chas. Whiteford
CLERK.

IN THE CIRCUIT COURT OF BALTIMORE CITY.

Ordered by the Court this *25th* day of June 1927, that the foregoing Report and Account of the Auditor be and the same is hereby finally ratified and confirmed, no cause to the contrary having been shown and that the Trustee apply the proceeds accordingly with a due proportion of interest as the same has been or may be received.

H. Arthur Stump
JUDGE.



TRUST ESTATE OF JAMES G. & SARAH STANLEY
IN ACCOUNT WITH
MESSRS. ROY S. BOND AND GEORGE W. EVANS, RECEIVERS

Cr.

By	amount of sale of No. 1239 McElderry Street as per Receivers Report of Sale filed March 2, 1927	\$2,200.00
----	---	------------

Dr.

To	the Receivers for their commissions on amount of sale per supra	136.00
"	the Receivers for their costs of suit	

viz.

Solicitor for plaintiff	\$10.00	
Clerk	32.25	
Sheriff	2.30	
Bond of Receivers	20.00	
Order Nisi	6.00	
Solicitor for Defendant	10.00	
Auditor & Notices	<u>14.00</u>	94.55

"	the Receivers for their disbursements as per their vouchers	
---	--	--

viz.

City Building & Loan Association in payment of mortgage on property sold	266.25	
Release of mortgage	7.30	
O. T. Butterworth & Co., Auctioneers	49.00	
Advertising Sale in Daily Record	22.44	
Affidavits	<u>1.00</u>	345.99

"	this Balance for distribution	<u>1,623.46</u> 2,200.00
---	-------------------------------	-----------------------------

Distribution Account

Cr.

By	Balance for distribution	1,623.46
----	--------------------------	----------

Dr.

To	James G. Stanley 1/2 Less amount to be allowed Sarah Stanley for repairs as per Order of Court February 1, 1927.	\$811.83 <u>193.97</u> 617.86
----	--	---

"	Sarah Stanley 1/2 Allowance for repairs as per supra	811.83 <u>193.97</u> <u>1,005.80</u> 1,623.46
---	--	--

MARYLAND, 22

610
1926

Cir. Ct.

No.....

Sarah Stanley
vs.

James H. Stanley

Attachment in Equity.

RECEIVED AT
THE SHERIFFS OFFICE ON

OCT 29 1927 11 26 AM

B No. 31087
(2A)

Filed 29 day of Oct 1927

11

(ATTACHMENT IN EQUITY)

MARYLAND, Sc.

The State of Maryland.

To the Sheriff of Baltimore City, Greeting:

You are Hereby Comanded, that you attach the body of *James Stanley*
2527 Mc Culloh St

if he shall be found in your bailiwick, and h_{is} sake keep, so that you have h_{im} before
the Judge of the Circuit Court, of Baltimore City, at the Court house in the same city, on
when apprehended
the *day of* *19*, to answer as well touching a certain contempt
by h_{im} committed in not *complying with the decree of this*
Court passed on the 28th day of June 1927,

as well as to such other matters and things as shall be then and there alleged against h_{im}

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 *12* day of *September* 19*27*

Issued the *29* day of *October* 19*27*

Chas R Whiteford Clerk.

Set attachment issue, October 29/27
amount due \$63⁰⁰

H. Arthur Plump
Plump

Serve on

James G Stanley
2527 McCulloch St

Ct. Ct.

✓ B 431-592-610
1926

Sarah Stanley

vs.

James N. Stanley

ORDER OF COURT

B No. 31087 B.
29

Filed

8th Meh

1928

Copy of the within Order of Court served on
James G. Stanley on the 9th day of March 1928
in presence of Joseph E. Lyett

John E. Potee
Sheriff

Geo P. S.

RECEIVED
COURT CLERK
MAY 9 10 43 AM
CLERK'S OFFICE

Sarah Stanley

vs.

James Y. Stanley

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this *2* day of *March* 192*8*
that the *Defendant* appear before this Court in person,
on the *19* day of *March*, 192*8*, 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 *28th* day of *June*, 192*7* directing the
payment of Alimony, ~~pendente lite~~, *& child support,* by him to the *Plaintiff*
provided a copy of this Order be served on the said *Defendant*
on or before the *17th* day of *March* 192*8*

Davis Evans
atys for complainant

Wm. H. Davis

DOCKET B.431/1926

IN THE CIRCUIT COURT.....

Sarah Stanley

vs

James G. Stanley

DEPOSITIONS

13 No. 31,087
1227

PLAINTIFF'S COSTS

Examiner X \$.....

Copies \$.....

Notices \$.....

Sheriff \$.....

Stenographer \$.....

\$

DEFENDANT'S COSTS

Examiner \$.....

Copies \$.....

Notices \$.....

Sheriff \$.....

Stenographer \$.....

\$

GEORGE ARNOLD FRICK, Examiner

Filed..... 7 day of June 1927

Sarah Stanley

vs.

James G. Stanley

In the Circuit Court
OF BALTIMORE CITY

The above entitled 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, GEORGE ARNOLD FRICK, one
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
27th day of January, 1927, met on
the 27th day of January in the year nineteen
hundred and twenty-seven, at my office, in the City of Baltimore, in the
State of Maryland, and assigned the 28th day of January
in the same year at four o'clock in the afternoon 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 Solicitors of the
respective parties to take the following depositions, that
is to say:

TESTIMONY taken at the office of George Arnold Frick, Examiner on Friday January 28th, 1927 at four o'clock in the afternoon.

Present: Davis & Evans, Counsel for Plaintiff.
Roy S. Bond, Counsel for Defendant.

Thereupon:

SARAH L. STANLEY, the plaintiff, produced as a witness on her own behalf, being first duly sworn, deposeseth and saith as follows, that is to say -

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Sarah L. Stanley, 1239 McElderry Street, folder in a factory.

2 Q- You are the plaintiff in this proceeding?

A- Yes, sir.

3 Q- How long have you known the defendant your husband?

A- About twenty-two years.

BY MR DAVIS:

4 Q- When were you married, Mrs Stanley?

Sarah L. Stanley.

A- December 18th, 1907.

5 Q- Where?

A- In Baltimore City by the Reverend Reed.

6 Q- You state that you and your husband lived together until December, 1921. You do not mean that he left the house at that time?

A- It was 1920 not 1921. He didn't leave the house then.

7 Q- You mean that you and he had ceased marital relations in 1920?

A- Yes, sir. We had different bedrooms. I had the front bedroom on the second floor and he had the back bedroom.

8 Q- Why had you ceased marital relations? State the circumstances?

A- Well, He had come in contact with some bad disease and I couldn't trust him any more. I told him that he couldn't live with me any more and that I wouldn't be a wife to him.

9 Q- Did he take treatment for that disease?

A- Yes, sir, at the Government Clinic. He started taking treatment the last part of February or the first part of March.

10 Q- How did you find out that he was taking treatment at the Government Clinic?

A- I found the card in his pocket.

11 Q- Is this the card you found? (Producing a small card)

Sarah L. Stanley

A- Yes, sir, this is the card.

NOTE: - The above mentioned card is now filed with the
Examiner marked Plaintiff's Exhibit Examiner
No. 1.

12 Q- Is your husband living at your address now?

A- No. He hasn't lived there since 1924.

13 Q- What caused him to leave?

A- He was ordered away by the Magistrate of the
Northeastern Police Station.

14 Q- Why was he ordered away?

A- I had him arrested because he threatened to kill
me. It seemed as if he got meaner as he took these
treatments.

15 Q- What was your conduct towards your husband?

A- I tried to do the best I could. I was kind and
affectionate to him.

16 Q- Was your conduct above reproach?

A- It was.

17 Q- Did you give him any cause or reason to be un-
faithful to you and to contract that disease?

A- None whatever.

18 Q- Has the abandonment of you by your husband been
continued ever since December 1920?

A- Yes, sir.

19 Q- Was it his own deliberate and final act?

A- Yes, sir.

Sarah L. Stanley.

20 Q- Is there any hope or expectation of a reconciliation between you and your husband?

A- No, sir. Never again.

21 Q- Have you lived or cohabited with him since his desertion in 1920?

A- No, sir.

22 Q- Were there any children born of this marriage?

A- Yes, sir, I have four children.

23 Q- What are their names and ages?

A- James F. Stanley, aged eighteen.

Leon W. Stanley, aged sixteen.

Gladys M. Stanley, aged fifteen.

Virginia D. Stanley, aged eleven.

24 Q- Who do they live with now?

A- With me.

25 Q- You wish to retain their care and custody?

A- Yes, sir.

26 Q- Are you able to take care of them?

A- Yes, sir, I am able to take care of them with assistance from the defendant.

27 Q- How long have you lived in the State of Maryland?

A- Since 1904.

- 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: -

Ms.
Sarah L. Stanley

JAMES F. STANLEY, a witness of lawful age, produced on behalf of the plaintiff, being first duly sworn, deposes and saith as follows, that is to say -

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- James F. Stanley, 1239 McElderry Street, laborer.

2 Q- Do you know the parties to this suit? Sarah L. Stanley and James G. Stanley?

A- Yes, sir, they are my mother and father.

BY MR DAVIS:

3 Q- You know that your mother and father lived together as man and wife and held themselves out to the community as such and were so treated by their friends and acquaintances?

A- Yes, sir.

4 Q- Up until when?

A- They lived together until the year 1924.

5 Q- Your mother testified that she discontinued living with your father as man and wife in 1920. Is that correct or incorrect?

A- That's right. It has been about seven years ago when they stopped living together as man and wife. He left the house in 1924.

6 Q- Do you know why your mother refused to occupy the same bedroom with your father?

James F. Stanley

A- I heard of him being sick with some disease and ever since then my mother and father separated from the bed.

7 Q- Do you know what kind of a disease that was?

A- So far as I understand he had the "Pox".

8 Q- What was the conduct of your mother towards your father?

A- She treated him as a wife should treat a husband.

9 Q- Was she kind and affectionate?

A- Yes, sir. My father, he would come in some nights and start an argument and my mother, she tried to smoothe it over with him. I guess he just felt like arguing.

10 Q- Did he ever beat or fight her?

A- Yes, sir, he did.

11 Q- When? Before she refused to occupy the same bedroom-with him?

A- After the separation he came into her room one night and jumped into her for a fight. Me and my brother was sleeping in the middle room. I jumped up to protect my mother and he had a razor to cut her with and when I jumped in he cut me right across the heart. I have the mark now.

12 Q- Was he arrested for that?

A- No, sir, he wasn't.

13 Q- Did your mother give your father any reason to abandon her?

James F. Stanley

A- No, sir.

14 Q- Her conduct was above reproach?

A- Yes, sir.

15 Q- It was his own deliberate and final act?

A- Yes, sir.

16 Q- Have your mother and father ever lived together as man and wife since then?

A- No, sir.

17 Q- Do you think there is any hope or expectation of a reconciliation?

A- No, sir.

18 Q- Has your mother been a resident of Maryland for more than two years prior to the filing of this Bill of Complaint.?

A- Yes, sir, she has to my knowledge been living here ever since I can remember.

19 Q- You are James the oldest child?

A- Yes, sir.

20 Q- Who comes next?

A- Leon is sixteen and the next one is Gladys, fifteen and Virginia. She is eleven.

21 Q- You want to remain with your mother?

A- Yes, sir.

22 Q- Do you think she is able with the help of your father to take care of her children?

A- Yes, sir.

James F. Stanley

23 Q- Is she the proper person to take care of them?

A- Yes, sir.

- 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.
James F. Stanley

The taking of testimony was then adjourned to the first day of April, 1927, at eleven o'clock in the morning, and at the same place, at which last mentioned time and place I attended, due notice of such meeting having been given and in the presence of the solicitor of the plaintiff proceeded to take the following deposition that is to say -

F. TALBOTT GATCH, a witness of lawful age, produced on behalf of the plaintiff, being first duly sworn deposed and saith as follows, that is to say -

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- F. Talbott Gatch. Raspeburg Station, Baltimore, contractor.

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

A- I know the defendant.

BY MR. DAVIS:

3 Q- Mr. Gatch, is James G. Stanley employed by you?

A- Yes.

4 Q- Would you mind giving his wages per hour?

A- He is a forty five cent man I am aure.

5 Q- How many hours do they work a day?

A- They make ten on clear days but in bad weather they cant.

F. Talbott Gatch.

6 Q- How many days a week do they work?

A- Six days. Saturday is a half day. That is five and a half days. A full week would make him fifty five hours at forty five cents.

No Cross Examination.

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

F. Talbot Gatch.

The taking of testimony was then adjourned to the third day of June, 1927, at half past twelve o'clock in the afternoon and at the same place, at which last mentioned time and place I attended, due notice of such meeting having been given and in the presence of the solicitors of the respective parties proceeded to take the following deposition, that is to say -

JAMES G. STANLEY, the defendant, produced as a witness on his own behalf, being first duly sworn, deposes and saith as follows, that is to say -

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- James G. Stanley, 1812 L. Madison Street, laborer.

2 Q- You are the defendant in this proceeding?

A- Yes, sir.

3 Q- How long have you known the plaintiff, your wife?

A- Well, about twenty years.

BY MR. BOND:

4 Q- Mr. Stanley, have you any children by your wife, Sarah L. Stanley?

A- Yes.

5 Q- What are the names and ages of them?

A- James Floyd Stanley is nineteen.

James G. Stanley.

6 Q- Where is he?

A- He is at home.

7 Q- Does he work?

A- Yes, sir.

8 Q- Do you know what his earning capacity is?

A- I do not.

9 Q- Is he dependent on his mother for support or does he work for his own living?

A- He works for his own living as far as I know.

10 Q- Who is the next one?

A- Leon Stanely.

11 Q- How old is he?

A- Seventeen or eighteen.

12 Q- Where is he?

A- At home.

13 Q- Does he work?

A- Yes, sir.

14 Q- Is he dependent upon his mother for support or does he work for his own living?

A- He earns his own living as far as I know.

15 Q- Are either of these two boys that you mention going to school?

A- No.

16 Q- Then, they are capable of working and earning their own living, aren't they?

A- Yes, sir.

James G. Stanley.

17 Q- What is the name and age of your next child?

A- Gladys Stanley is fifteen.

18 Q- Where is she?

A- At home.

19 Q- Does she go to school?

A- Yes, sir.

20 Q- What is the name and age of your next child?

A- Virginia Stanely is twelve.

21 Q- Does she go to school or work?

A- Goes to school.

22 Q- Then, if I understand you correctly you have two children that are dependent on their mother for support?

A- Yes, sir.

23 Q- And they are the two girls?

A- Yes, sir.

24 Q- Are you contributing to their support under Order of Court?

A- I am.

25 Q- How much are you paying under Order of Court?

A- Seven dollars per week.

26 Q- How long have you been paying that seven Dollars a week. Since this case came up for hearing for alimony?

A- Yes, sir.

27 Q- Are you able to pay any more?

A- I am not.

James G. Stanley.

28 Q- How, your boss testified the other day that you make Twenty four Dollars and seventy five cents per week providing you work the whole week. Do you work the whole week?

A- I do not.

29 Q- What days are you off?

A- I have to lose all rainy days.

30 Q- Then about what is your average per/week?

A- I average about Twenty two Dollars per week.

31 Q- Did you have a hearing over at Court before His Honor Judge Stump and after hearing all the details what amount did Judge Stump order you to pay?

A- Seven Dollars.

32 Q- And you are willing to continue to pay this Seven Dollars per week in the event a divorce is granted, aren't you?

A- Yes, sir.

33 Q- Until the children become self sustaining and are out of school?

A- Yes, sir.

34 Q- Are you desirous of seeing your children at any time?


A- Yes.

35 Q- Would you like them to visit you at reasonable times and places?

A- I would.

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 other witnesses being named or produced before me, I then at the request of the Solicitors of the respective parties closed the depositions taken in said cause, and now return them closed under my hand and seal on this seventh day of June in the year of our Lord nineteen hundred twenty seven at the City of Baltimore, in the State of Maryland.

George Arnold Frick
Examiner. SEAL

There ~~are~~ is one Exhibits with these depositions, to wit:
Plaintiff's Exhibit Examiner No. 1.

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 three days, on two of which I was employed by the plaintiff, and on one by the defendant.

George Arnold Frick
Examiner.