

Same on

Hyers Court

1709 Grand Hill

In the ^{B 5 Nov 1922}
Circuit Court No. 2 of
Baltimore City.

Geneva R. Taylor

vs

William M. Taylor

Bill for Divorce -
@ Vinculo Matrimonii

Order

Mr. Clerk,
Please file
and issue for the
defendant etc

G. R. Dunlop
Solicitor for Def't

No 22178 B
1-4

Copy or copied

Feb. 4 November 1922

COMMERCIAL

*Copy of the within Bill of Complaint and Order of Court
served on William M. Taylor on the 9th day of November
1922 in the presence of Alexis R. Niteck*

Fees \$0.50

Thomas J. McQuilty
Sheriff

Geneva R. Taylor * In the
 * Circuit Court No. 2
 * of
 * Baltimore City.
vs *
William M. Taylor *

To the Honorable, the Judge of said Court:

The Bill of Complaint respectfully says:

1. That the plaintiff and defendant were lawfully married on or about the 21st day of May 1918 and lived together as husband and wife until on or about the month of October 1922, when separation was forced by the defendant as will appear by these proceedings.
2. That the conduct of the plaintiff has always been true, kind and loving towards the defendant, but that the defendant has never treated the plaintiff with due consideration.
3. That the moral conduct of the plaintiff has been without reproach in any respect and that she has always been a true to her marriage vows at all times.
4. That two children living were born to the parties by reason of said marriage: Melvin a boy, now nearly two years of age and Ralph , a boy less than one two months old, both of whom are in her custody.
5. That the defendant at different time and on different occasions been guilty of the crime of adultery with divers women, the names and places thereof are unknown to the plaintiff and that since the discovery thereof the plaintiff has not in anyway condoned the same, nor cohabitted with the defendant.
6. That the defendant since the said marriage, has been cruel and brutal, at time, assaulted the plaintiff so that her body was subjected to great pains, so much so that she compelled to remain in bed; that on or about the month of October 1922, the defendant assaulted her in such a manner that her back, became so bruised that she could not nurse her infant baby, then less than one month old, that her life and health now in great danger, having only a small apartment was compelled to occupy different beds and rooms pending these proceedings.

7. That the plaintiff has been a resident of Baltimore City and State of Maryland for more than two years next before these proceedings began.

8. That she is without sufficient means to pay and provide for Solicitor's fees and the costs of these proceedings as they become due during the progress of same, but that the defendant has an income of about twenty-five dollars per week payable weekly, your complainant is therefore advised that she is entitled to an order of this Court requiring the defendant to pay a reasonable sum of money for her support as alimony pendent lite and a further sum to pay and provide for the costs of the proceedings and Solicitor's fees.

To the end, therefore, the plaintiff will ever pray that the defendant be require to answer the Bill of Complaint under oath.

2. That an order be passed in these proceedings allowing a reasonable sum of money as alimony for her support and a further order requiring a reasonable amount of money be paid for the costs of the proceedings.

3. That an order be passed requiring a reasonable sum of money be paid her Solicitor to conduct these proceedings.

4. That an order be passed in these proceedings restraining the defendant from removing any of the household goods from their home at 1709 Druid Hill Avenue.

5. That the defendant be restrained in anyway molesting her at any place or at any time pending these proceedings.

6. That the plaintiff be divorced a vinculo matrimonii from the defendant, William M. Taylor.

8. And such other and further relief as her case and equity require.

May it please your Honor to grant unto her the writ of subpoena directed to said William M. Taylor, residing in Baltimore City Maryland, commanding him to be and appear in this Court on some certain day to be named therein and to appear and answer the Bill of Complaint and to show good and sufficient cause, if any, he may have why the prayers of said bill should not be granted as as therein parayed.

G. L. Rudolph
Solicitor for Complainant.

State of Maryland, Baltimore City : SS : -

I hereby certify that on this 3rd day of November 1922, before me the subscriber a *Notary Public* of the State of Maryland in and for said city, personally appeared *Genevra R Taylor* and made oath in due form of law that the matters and things set out in the foregoing are true to the best of her knowledge and belief.

Betha L. Hatcher
Notary Public



Upon the foregoing Bill of Complaint and affidavit
by the Circuit Court No. 2 of Baltimore City, this 6 day of
November 1922, that William M. Taylor, the defendant, be
and he is hereby restrained and enjoined from removing any of the
household furniture at 1709 ~~Druid~~^{Druid} Hill Avenue, Baltimore City,
pending these proceedings, *and*

~~And~~ it is further ordered that the said William M. Taylor,
be and he is hereby restrained from molesting the plaintiff in any
manner in the use of the apartment at 1709 Druid Hill Avenue
Baltimore City, provided a copy of this order be served upon said
William M. Taylor, the defendant on or before the 13th day of
November 1922.

C. Lane Fisher

413
Ct. Ct. No. 2

547
1922 B Docket No. 31

Taylor
vs.

Taylor

Subpoena to Answer Bill of Complaint

Per

No. 22178 B
2

Copies - copied

Filed 13 November, 1922
J. L. Peridleton
Solicitor.

11

Summoned and a copy of the process left
with the defendant.

Thomas A. McKelvey

Deputy Sheriff

(Pitcock
11/9-22)

EQUITY SUBPOENA
The State of Maryland

To

William M Taylor

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

Geneva R Taylor

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 *September*, 192*2*

Issued the *4* day of *November* in the year 192*2*

John Stewart

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

Defendant

B *547* Docket *31*
1922

Circuit Court No. 2

Taylor

vs.

Taylor

Order Counsel Fee and Alimony

Pendente Lite

ORDER

6 November 1922

No. *22178* B.
3

Copy of Report

Filed

6 November 1922

11

*Copy of the within Order of Court served on
William M. Taylor on the 9th day of November 1922
in the presence of Aloysius R. Vittek -*

\$0.50

Thomas A. McKeethy
Sheriff

Geneva R Taylor

William M Taylor

IN THE
CIRCUIT COURT No. 2

OF
BALTIMORE CITY

September TERM, 1922

ORDERED BY THE COURT, this

6

day of November, 1922,

that the defendant

William M Taylor

pay to the plaintiff

Geneva R Taylor

the sum of

Nine

Dollars per week, during the continuance of this suit as Alimony, **pendente lite**, unless cause to the

contrary be shown on or before the

13th

day of November, 1922, provided a copy of this Order be served on the said defendant

William M Taylor

on or before the

13th

day of November, 1922, the question of Counsel fee being reserved for the

further determination of this Court.

Charles F. Allen

TRUE COPY—TEST:

\$25 per week

2 checks

Clerk.

13547/1922

DEPT. CIRCUIT COURT / 0.2

OF
BALTIMORE CITY.

GEMMA R. TAYLOR

VS.

WILLIAM M. TAYLOR

DEFENDANT'S ANSWER

Mr. Clerk:-
Please file.

PROPERTY OF DEFENDANT

No 22.1781
5

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

Feb 24 1922

GENEVA R. TAYLOR : IN THE CIRCUIT COURT NO.2

VS. : OF

WILLIAM M. TAYLOR : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

The answer of the defendant to the petitioned complainant respectfully shows as follows:-

1. The defendant admits the first paragraph of the plaintiff's amended Bill of Complaint.
2. The defendant denies with great emphasis the second paragraph of the plaintiff's Bill of Complaint.
3. The defendant denies with great emphasis the third paragraph of the plaintiff's Bill of Complaint.
4. The defendant admits the fourth paragraph of the plaintiff's Bill of Complaint.
5. The defendant denies with great emphasis the fifth paragraph of the plaintiff's Bill of Complaint.
6. The defendant denies with great emphasis the sixth paragraph of the Plaintiff's Bill of Complaint.
7. The defendant admits the seventh paragraph of the plaintiff's Bill of Complaint.
8. Your respondent has an income amounting to twenty-five dollars per week, but is employed at a salary much less than the aforementioned amount.

WHEREFORE your respondent prays that the Bill of Complaint be dismissed with costs to the complainant.

William Taylor - 050
DEFENDANT

Thomas J. [Signature]

PROPERTY FOR DEFENDANT.

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this day of November,
in the year one thousand nine hundred and twenty two,
before me, the subscriber, a Notary Public of the State
of Maryland, in and for the City of ~~Baltimore~~ aforesaid,
personally appeared William M. Taylor, the defendant in
the foregoing Bill and made oath in due form of law that
the matters and facts contained in the foregoing answer
are true to the best of his knowledge and belief.

WITNESS my hand and Notarial Seal.

J. Francis Henry
NOTARY PUBLIC.

G L Pendleton

176 ✓ 60

Cir. Ct. No. 2

547
1922

Docket No. 31

Geneva Taylor

vs.

John M Taylor

MOTION FOR HEARING

No. 22178 B
6

Filed, 24 November 1922

20110101010

J. Stewart Davis

Geneva Taylor
vs.
Wm M Taylor

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

The Geneva Taylor by G. L. Reedborn

Solicitor, applies to have the above entitled cause placed in the
Trial Calender for hearing on Alimony + Solicitors fee

In conformity with the First Equity Rule.

G. L. Reedborn
Solicitor for Complainant

Serve on

J. Steward Davis
Sweatshop

No 176

Cir. Ct. No. 2

547
192

B

Docket No. 31

Taylor

vs.

Taylor

NOTICE AS TO HEARING

No. 22178 B.

Copied & Kept

Filed 24 November 1922

Copy of the within notice served on Stewart Davis
Solicitor on the 25th day of November 1922 in
presence of Harry B. Franz

Thomas J. McQuilty
Sheriff

Fees \$ 0.50

Geneva R Taylor

vs.

William M. Taylor

IN THE
CIRCUIT COURT, No. 2

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

Monday and

Counsel fee

when reached in due course on the said calendar.

JOHN PLEASANTS,

Clerk Circuit Court No. 2.

Ct. Ct. No. 2 31 B. ⁵⁴⁷/₁₉₂₂

Geneva Taylor

vs
William Taylor

Final Order, Counsel Fee and Alimony
Pendente Lite,

No. 22178. B.
8

Filed. *S. Lee* 1922

Geneva Taylor

vs.

William Taylor

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 8th day

of December 1922, that the defendant

pay to the plaintiff

the sum of ~~Twenty Five Dollars~~ Dollars, as Counsel Fee

for the Solicitor of the and that he

further pay the sum of Seven Dollars per week,

for 6 weeks thro the Prisoners Aid Association during the continuance of this suit, to the said plaintiff

as Alimony pendente lite accounting from the 8th day of Dec. 1922

Subscribed

Senior on
Defendant
of
J. Steward Davis
Solicitor

| |
|---|
| IN THE CIRCUIT COURT <i>no 2</i> of BALTIMORE CITY |
| GENEVA TAYLOR VS WILLIAM M. TAYLOR |
| Petition for an order to modify order passed for alimony. |
| Mr. Clerk, Please file, <i>G. P. Davis</i> Solicitor for Petitioner. |
| <i>Copied order looked</i> <i>No 22178 B</i> <i>9-18</i> |
| <i>of 11 December 1922</i> |

31/12/1922
549
1922

*Copy of the within Petition and order of Court served
on J. Steward Davis Solicitor on the 14th day
of December 1922 in presence of Harry B. Framy
Thomas J. M. Enulty
Sheriff*

Fees \$0.50

| | | |
|--------------------|---|---------------------|
| Geneva Taylor, | " | IN THE |
| | * | |
| vs | | CIRCUIT COURT NO. 2 |
| | * | |
| William M. Taylor, | " | OF |
| | * | |
| | " | BALTIMORE CITY |
| | * | |

To the Honorable, the Judge of said Court:

The Petotion of Geneva Taylor, plaintiff in this case respectfully says:

1. That by an order passed in the above entitled case she awarded the sum of seven dollars per week upon the representation that the defendant was making only seventeen dollars per week.
2. That your petitioner has discovered that the defendant has an income of forty-one cents per hour of eight hours per day which averages twenty-two dollars and ninety-six cents per week.
3. That he has in addition to the above a bonus of towit: two dollars and ninety-six cents per month for a certain source, the particulars of which she is not fully acquainted.
4. That he has the buisiness of selling meals at the place of imployment the proceeds of which she has no means of ascertaining any particulars.

Your Petitionr therefore, prays:

1. That she be heard upon such evidence as may be proper.
2. That the order passed be modified in such a manner that the defendant may be required to pay more than seven dollars per week.

And such other and further relief as her case and equity require.

G. L. Beardsley

 Solicitor for Petitioner

Upon the foregoing petition by the Circuit Court No. 2 of Baltimore City, this 11 day of December 1922, that William M. Taylor, the defendant, show cause why the order passed in these proceedings dated the 1st day of December 1922, should not be modified, on or before the 26-day of December 1922, provided a copy of this order be served upon said William M. Taylor, or his Solicitor of record, on or before the 16th day of December 1922.

Subscribed

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

2nd day of January, A. D. 1923, Ordered by the Circuit Court No. 2 of

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

Subscribed

George L'Pard

✓ 3

Cir. Ct. No. 2

547
1922

B
Docket No. 31

Henry Taylor

vs.

John M. Taylor

MOTION FOR HEARING

No. 22178 B.
" "

Filed, 15 January 1923

J. Steward Davis

Circuit Court No. 2

WILLIAMS CELL

Ann Taylor
vs.
Ann M. Taylor

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

Placematt by G. L. Bechtel
him Solicitor, applies to have the above entitled cause placed in the

Calendar for hearing on Petition and order for modification
Order of Court passed 11th December 1924

after my
In conformity with the First Equity Rule.

G. L. Bechtel
Solicitor for G. V.

Serve on

J Steward Davis
Solicitor

Cir. Ct. No. 2

547
1922

B

Docket No. 31

Taylor

vs.

Taylor

NOTICE AS TO HEARING

No. 22178 B.
12

Copied - Copied

Filed 15 January, 1923

Copy of the within Notice served on J Steward Davis
Solicitor on the 17th day of January 1923 in presence

of Harry B Franz

Thomas F McNulty
Sheriff

Fees \$ 0.50

Geneva R Taylor

VS.

William M. Taylor

IN THE
CIRCUIT COURT, No. 2

OF
BALTIMORE CITY.

Upon application made by the Solicitor for the

Reinuff

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 *Petition and order*

for readjustment of order of Court passed December

11. 1922

when reached in due course on the said calendar.

JOHN PLEASANTS,

Clerk Circuit Court No. 2.