

IN THE CIRCUIT COURT OF  
BALTIMORE CITY

EDNA SHIPLEY

VS.

HARRY L. SHIPLEY

*grdw*

*B 507*  
*1926*

BILL OF COMPLAINT.

*B 31221*

Mr. Clerk:

Please file, etc.,

*M. Carter Hammond*  
SOLICITOR FOR COMPLAINANT.

N. CARTER HAMMOND  
ATTORNEY AT LAW  
543-553 CALVERT BUILDING  
BALTIMORE, MD.

FILED  
*13 Nov-1926*

THE DAILY RECORD COMPANY  
Baltimore, Md.

EDNA SHIPLEY : IN THE CIRCUIT COURT  
VS. : OF  
HARRY L. SHIPLEY : BALTIMORE CITY

\*\*\*\*

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Bill of Complaint of Edna Shipley of Baltimore City, State of Maryland, by N. Carter Hammond, her solicitor, complaining says:

(1) That on or about the 15th day of October, 1924 she was married to Harry L. Shipley, at Baltimore City, State of Maryland, by a regular ordained minister of the gospel and lived together as man and wife from the date of their marriage until on or about the 20th day of January, 1926.

(2) That your Oratrix is a resident of Baltimore City, State of Maryland, and has been a resident thereof for a period of more than two years prior to the filing of this Bill of Complaint.

(3) That there are no children born as an issue of this marriage.

(4) That although the conduct of your Oratrix toward her said husband has been kind, affectionate, chaste, and above reproach the said Harry L. Shipley, has committed the act of adultery with various women, whose names will be disclosed at the time of the hearing of this cause.

(5) That the Defendant is now employed by his brother, Charles Shipley, Caterer, and his earnings amount to approximately Twenty-five dollars, (\$25.00) a week.

(6) That your Oratrix is destitute without means to support herself and has no funds with which to pay her Solicitor in this proceeding.

WHEREFORE, your Oratrix prays:

(a) That your Oratrix may be divorced a vinculo matrimonii from the defendant, Harry L. Shipley.

(b) That the Defendant may be required, pending the final hearing of this cause, to pay a reasonable sum weekly as alimony pendente lite for the support of your Oratrix.

(c) That the Defendant may be required to pay a reasonable sum as counsel fee for the solicitor of your Oratrix.

(d) That the Defendant may be required to pay a reasonable sum as permanent alimony for the future maintenance and support of your Oratrix.

(e) That your Oratrix may have such other and further relief as the cause may require.

May it please your Honor to grant unto your Oratrix the writ of Subpoena directed to the Defendant, Harry L. Shipley, 706 Madison Avenue, Baltimore, Maryland, requiring him to be and appear in this Honorable Court on or before some certain day to be named in the said writ to answer the premises and abide by and perform such decree as may be passed herein.

And as in duty bound, etc.,

Edna Shipley  
COMPLAINANT.

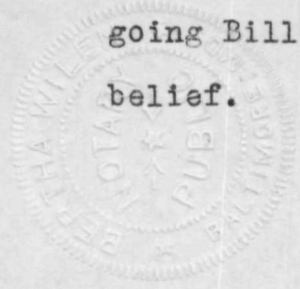
V. Curtis Hancock  
SOLICITOR FOR COMPLAINANT.

STATE OF MARYLAND, CITY OF BALTIMORE, TO WIT:

I HEREBY CERTIFY, that on this 9th day of November, 1926, before me, the subscriber, a Notary Public, of the State of Maryland, City aforesaid, personally appeared Edna Shipley, and made oath in due form of law that the matters and facts named in the foregoing Bill of Complaint are true to the best of her knowledge and belief.

AS WITNESS my hand and Notarial Seal.

Bertha Aiken  
NOTARY PUBLIC.



P 796

Ct. Ct.

B-507

192 6 Docket No.

Edna Shipley

vs.

Harry L. Shipley

*70 to 91 Adams St*

**SUBPOENA TO ANSWER BILL OF COMPLAINT**

*Pro*

No. B-31221

(2)

Filed *18 Nov.*, 1926

N. Carter Hammond SOLICITOR

*10*

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

*Becky  
11/18/26*

*yes \$0.80*

*John E. Pote  
Sheriff*

EQUITY SUBPOENA

The State of Maryland

On Harry L. Shipley  
706 Madison Avenue

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

Edna Shipley

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 8th day of November, 1926  
Issued the 13th day of November, in the year 1926.

*Chas. R. Whiteford* Clerk

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

B Docket 507  
1926

CIRCUIT COURT.

Edward Shipley

VS.

Harry L. Shipley  
#206 Madison Court

Order for Alimony

Pendente Lite

ORDER

B No. 31221

(13)  
\$25 per week

FD: 15 November 1926

Copy of the within Order of Court served  
Harry L. Shipley on the 18th day of November  
1926 in the presence of August J. Bielby

Fees \$0.50

John C. Potter  
Sheriff

IN THE  
**CIRCUIT COURT**  
OF  
BALTIMORE CITY

Edna Shipley

vs.

Harry L. Shipley

Nov.

TERM, 192

ORDERED BY THE COURT this 15<sup>th</sup> day of November 1926

that the defendant

Harry L. Shipley

pay to the plaintiff

Edna Shipley

the sum of

Eight

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

day of November 1926 to the said plaintiff

15<sup>th</sup>  
Edna Shipley

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

day of November 1926 provided a copy of this Order be served on the said defendant

Harry L. Shipley

on or before the

22<sup>nd</sup>

day of November 1926.

*ci fronte*

TRUE COPY—TEST:

CLERK

IN THE CIRCUIT COURT OF

BALTIMORE CITY

507-1926

EDNA SHIPLEY

VS.

HARRY L. SHIPLEY

RESPONDENT'S ANSWER

1331221

Mr. Clerk:-

Please file.

*Davis & Evans*

ATTORNEYS FOR RESPONDENT

DAVIS & EVANS  
ATTORNEYS AT LAW

507 19 Nov. 1926



EDNA SHIPLEY : IN THE CIRCUIT COURT  
VS. : OF  
HARRY L. SHIPLEY : BALTIMORE CITY

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the bill of complaint in the above entitled cause respectfully says:

1. That he admits the allegations contained in the first paragraph of the plaintiff's bill.
2. That he admits the allegations contained in the second paragraph of the complainant's bill.
3. That he admits the allegations contained in the third paragraph of the complainant's bill.
4. That he denies with great emphasis the allegations contained in the fourth paragraph of the complainant's bill.
5. That he admits the allegations contained in the fifth paragraph of the complainant's bill.
6. That he denies the allegations contained in the sixth paragraph of the complainant's bill.

Having fully answered said bill of complaint, your respondent prays that the bill be dismissed with costs to the plaintiff.

*Davis & Evans.*  
ATTORNEYS FOR RESPONDENT

# CIRCUIT COURT

19

Docket No. <sup>507</sup> 1926

*Chas. H. Haysley*  
US.

*Henry H. Shirley*

Order

19

*CHAS H*

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

B No. 31221

<51>

Fd *S. W. De*

1926

*Edna Shipley*  
vs.  
*Harry L. Shipley*

IN THE  
Circuit Court  
OF  
BALTIMORE CITY

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

THE PETITION OF *Edna Shipley*

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

*H. Curtis Hammond*  
Solicitor for *Complainant*

ORDERED, this *8<sup>th</sup>* day of *December* 19*26*, 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.

*[Signature]*

3/13/31/2

Doc. 8 507  
1926

In the Circuit Court,  
OF BALTIMORE CITY

DEPOSITIONS

*Edna Shipley*  
*vs.*  
*Harry S. Shipley*

No. 312213

PLAINTIFF'S COSTS

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

DEFENDANT'S COSTS

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

*To do March 1929*

Edna Shipley

vs.

Harry D. Shipley

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 eighth day of December 1926, met on the twelfth day of December in the year nineteen hundred and twenty-six at my office, in the city of Baltimore, in the State of Maryland, and assigned the thirteenth day of December in the same year at two o'clock in the afternoon and the office of N. Carter Hammond 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 plaintiff to take the following depositions, that is to say:—

EDNA SHIPLEY

VS.

HARRY L. SHIPLEY.

Testimony taken before me, A. deRussy Sappington, Examiner, at the offices of N. C. Hammond, Esquire, Baltimore, Md' on December 13, 1926, at 2.00 o'clock in the afternoon.

Thereupon---

EDNA SHIPLEY,

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

By the Examiner:

Q State your name, residence and occupation?

A Edna Shipley, 927 Argyle Avenue, housework

Q Do you know the parties to this suit?

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

By Mr. Hammond:

Q When, where and by whom were you married?

A On October 15, 1924, in Baltimore, Maryland, by a Minister of the Gospel.

Q How long have you lived in Baltimore, Maryland?

A All my life.

Q Are there any children as result of your marriage?

A No, sir.

Q Since your marriage have you always been a good, faithful wife?

A I have.

Q When did you and your husband separate?

A On January 20, 1926. I left him when I found he had committed adultery, I had strong suspicions.

Q What do you know about your husband being guilty of adultery?

A I found him at the Hotel Attucks on Madison Avenue and Dolphin Street, on February 26th, 1926, in Room No. 19, with a girl named Pearl Mason.

Q Did you go up to the room?

A Yes, sir. The door was closed, and I waited outside forty-five minutes, and then my husband and Pearl Mason came out. Mr. Holmes here (indicating) was with me.

Q Is that the only occasion that you know of?

A No. A second time was on March 31, 1926, and my husband and Pearl Mason had moved from Room 19 to Room No. 9, and Mr. Green here (indicating) and I went up and knocked on the door, and my husband came to the door, and only had his pants and shirt on, and Pearl Mason was on the bed with only a nightgown and kimono on. I accused my husband, and of course he admitted to me that he was living with her as his wife. He still lives with her.

Q Since you found out that your husband was guilty of adultery have you ever lived or cohabited with him?

A I have not.

Q Have you forgiven or condoned his offense in



any way?

A No, sir.

Q In your bill of complaint you have asked for alimony. How much do you want the Court to grant you?

A I want him to pay ten dollars a week, and I want it paid through the PRISONERS AID ASSOCIATION.

Q Is he able to pay that?

A Yes, sir, he is with his brother, Charlie Shipley, caterer, and he makes between twenty-five and thirty dollars a week, and more.

Q And you want him to pay the costs of this proceeding, and also a counsel fee to your attorney for his services in the matter?

A Yes, sir, I do.

Q Mrs. Shipley, since taking the testimony in 1926, have you lived or cohabited with your husband, Lee Shipley?

A No.

Q Have you forgiven or condoned his deeds of adultery?

A No.

Q Do you know what his earnings amount to at this time

A No, I do not.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this, your examination, or the matters in question between the parties? If so, state the same fully and at large in your answer.

A. *No*

*Edna H. Shipley*

Thereupon---

WILLIAM J. GREEN,

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 William J. Green, 109 E. Pleasant St.,

Investigator

Q Do you know the parties to this suit?

A Yes, sir, I do, very well.

By Mr. Hammond:

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

A Yes, sir.

Q Were they known by their friends, relatives and acquaintances as husband and wife?

A Yes, sir.

Q Has Mrs. Shipley been a good, faithful wife, so far as you could observe?

A She has, yes, sir.

Q Were you in company with Mrs. Shipley on March 31, 1926?

A I was, at 9.30 o'clock P.M.

Q What happened?

A We went to the Attucks Hotel, and there in Room No.9 found Mr. Shipley and Pearl Mason, the girl with whom he was living at the Attucks, and he came to the door partly undressed, and Pearl Mason was on the bed, undressed, with the exception of a nightgown or kimono, and her bedroom slippers. All of her street clothing were hanging on chairs or across the foot of the bed.

Q Did Mrs. Shipley say anything to her husband?

Q Are there any children as result

of this marriage?

A No, sir.

Q When did the separation between the

parties take place?

A About the middle of January, 1926.

Q Have the parties ever lived or cohabited

together since that time?

A No, sir.

Q Are there any children as result of this marriage?

A No, sir.

Q When did the separation between the parties take place?

A About the middle of January, 1926.

Q Have the parties ever lived or cohabited together since that time?

A No, sir.

Q Were you in company with Mrs. Shipley on March 31, 1926?

A I was, at 9.30 o'clock P.M.

Q What happened?

A We went to the Attucks Hotel, and there in Room No.9 found Mr. Shipley and Pearl Mason, the girl with whom he was living at the Attucks, and he came to the door partly undressed, and Pearl Mason was on the bed, undressed, with the exception of a nightgown or kimono, and her bedroom slippers. All of her street clothing were hanging on chairs or across the foot of the bed.

Q Did Mrs. Shipley say anything to her husband?

A Yes, she accused him, and of course he admitted it, and told her she could do what she pleased about it.

Q Has Mrs. Shipley lived or cohabited with her husband since she learned of his adultery?

A No, sir.

Q Has she forgiven or condoned his offense in any way?

A No, sir.

Q Was there anyone else in this bedroom except the defendant, Mr. Shipley, and this girl Pearl Mason?

A No one else, just the two of them.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this, your examination, or the matters in question between the parties? If so, state the same fully and at large in your answer.

A. no

Wm J. Green.



Thereupon---

WILLIAM HOLMES,

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 William Holmes, 109 E. Pleasant St.,  
investigator

Q Do you know the parties to this suit?

A I do.

By Mr. Hammond:

Q Were you in company with the plaintiff,  
Mrs. Shipley, on the night of February 26, 1926?

A I was.

Q Tell what happened on that night?

A I was at the Attucks Hotel at six P.M.  
and at 7.30 Mrs. Shipley joined me there and at 7.55  
P.M. I saw Mrs. Pearl Mason enter the Attucks and  
she went up on the third floor and entered room  
No. 19 without rapping, and closed the door, and

Mrs. Shipley and I waited in the hall about forty minutes, and then Pearl Mason came out in company with Mr. Shipley.

Q Has Mrs. Shipley ever lived or cohabited with her husband since she learned of his adultery?

A No, sir.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this, your examination, or the matters in question between the parties? If so, state the same fully and at large in your answer.

A. No

*J. W. Tom, Examiner*

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

A. de Russy Sappington (SEAL).  
Examiner.

There are no Exhibits with these depositions, to wit:

Plaintiff's Exhibit 1

Defendant's Exhibit 1

A. de Russy Sappington  
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.

A. de Russy Sappington  
Examiner.

Circuit Court

507  
1926

Docket No. \_\_\_\_\_

*Elna Shipley*

vs.

*Harvey L. Shipley*

Order of Reference  
and Report

*Wors*

*B* No. *31221*  
*(17)*

Order Filed *21* day of *May* 192*9*  
Report Filed *4<sup>th</sup>* day of *April* 192*9*

Edna Shipley  
vs.  
Harry L. Shipley

IN THE  
**Circuit Court**  
OF  
BALTIMORE CITY

Term, 192

This case being submitted, without argument, it is ordered by the Court, this 21<sup>st</sup> day of March, 19 29, that the same be and it is hereby referred to Ward B. Coe, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

*Ward B. Coe*

**Report of Auditor and Master**

Bill for divorce a vinculo matrimonii and for permanent alimony filed by the wife against her husband on the ground of adultery. Code Art. 16, secs. 37-42.

Defendant summoned and answers by solicitor.

Plaintiff's residence in Baltimore City for more than two years proven.

The marriage proven.

The adultery proven.

By agreement filed herein plaintiff waives all claim for alimony.

More than thirty days have elapsed since the filing of the bill.

Case submitted and ready for decree.

*Ward B. Coe*

Auditor and Master

April 4th, 1929

B-507  
1928

Circuit Court

19

Docket

Edna Shipley

vs.

Lee H. Shipley

SUBMISSION FOR DECREE.

Mr. Clerk,  
Please file,

*W. Carter Jamerson*  
Solicitor for Plaintiff.

B 3122-1

No.

187

Filed 4<sup>th</sup> April 1929

Edna Shipley

Lee H. Shipley <sup>vs</sup>

In the Circuit Court  
of Baltimore City

TERM, 19\_\_

To the Honorable

Judge of Said Court:

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

*N. Carter Hammond*

Solicitor for Plaintiff,

*Stewart Davis*

Solicitor for Defendant.

*G. W. Evans.*



IN THE CIRCUIT COURT  
OF  
BALTIMORE CITY  
(Docket B 1926, fol. 507)

EDNA SHIPLEY

vs.

HARRY L. SHIPLEY

WAIIVER OF ALIMONY

B31221

(97)

fd. 4<sup>th</sup> April 1929

I hereby agree to waive any rights or claims  
that I have for alimony, maintenance, and support against  
my husband, Lee Shipley.

March 30, 1929.



March 30, 1929.

I hereby agree to waive any rights or claims  
that I have for alimony, maintenance, and support against  
my husband, Lee Shipley.

Edna Deann Shipley

STATE OF MARYLAND :  
                          : ss.  
CITY OF BALTIMORE :

I hereby certify that Edna Shipley personally  
appeared before me, and acknowledged the above waiver to  
be her act.

In testimony whereof I have hereunto set my  
hand and affixed my seal this 30 day of March  
1929.

Robert H. Peck  
Notary Public.

**CIRCUIT COURT**

**B** 507  
1926 No. 66 Docket

EDNA SHIPLEY

VS.

HARRY L. SHIPLEY

Recorded

Folio 78 1929

**Decree of Divorce**

**B** No.

31221  
(10)

99 6<sup>th</sup> April 1929

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

*Ward B. Ellis*  
Auditor and Master.

**Circuit Court**

OF

BALTIMORE CITY

EDNA SHIPLEY

VS.

HARRY L. SHIPLEY

*March*

Term, 192*9*

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

It is thereupon, this *6<sup>th</sup>* day of *April*, A. D. 192*9*

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said *Edna Shipley*

the above named Complainant be and she is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, *the said Harry L. Shipley.*

And it is further Ordered, That the said *defendant* pay the cost of this proceeding.

*[Handwritten signature]*