

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

*B 62*  
*1928*

CHARLIE GREEN

VS.

FLORIDA GREEN

*702 N. Eddy St*  
*B 32 712*

BILL FOR DIVORCE.

Mr. Clerk:

Please file.

*Davis & Evans*  
*Davis & Evans*

ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS  
ATTORNEYS AT LAW

*FD 13 Feb 1928*

CHARLIE GREEN : IN THE CIRCUIT COURT  
VS. : OF  
FLORIDA GREEN : BALTIMORE CITY.

---

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

- (1) That he was married to his wife, Florida Green, on the 15th day of January, 1923 and with whom he resided until the 28th day of August, 1926.
  - (2) That ever since said marriage your Orator has behaved himself as a faithful, chaste and affectionate husband toward the said Florida Green.
  - (3) That the defendant, Florida Green, has at divers times and places, committed the crime of adultery with one Earl Cohen and with divers other lewd and abandoned men, whose names to your Orator are unknown and that he has not lived or co-habited with the said defendant since he learned of the adulteries and said offense has not been condoned by your Orator.
  - (4) That there are no children born as result of said marriage.
  - (5) That both your Orator and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this Bill of Complaint.
- TO THE END, THEREFORE, YOUR ORATOR PRAYS:
- (a) That he may be divorced a vinculo matrimonii from the said Florida Green.
  - (b) That he may have such other and further relief as his case may require.

May it please your Honor to grant unto your Orator the Writ of Subpoena directed against the said Florida Green, commanding and requiring her to be and appear in this Court on some day certain to be named therein to answer the premises and abide by and perform such decree or order as may be passed therein.

AND as in duty bound, etc.

*Davis Evans*

---

ATTORNEYS FOR PLAINTIFF

P 586 ✓

Ct. Ct.

B-62

192 8 Docket No.

Charlie Green

vs.

Florida Green

702 N. Bay St

**SUBPOENA TO ANSWER BILL OF COMPLAINT**

Pro

No. B-32712

(2)

Filed 6<sup>th</sup> Mech, 1928

Davis & Evans

SOLICITOR

13

Summured and a leafy of the process left with the defendant.

John E. Potee Sheriff.

Pro \$0.95

(Keine) (2/3/28)

THE SHERIFF

FEB 13 1928 2 17 PM

EQUITY SUBPOENA

The State of Maryland

On Florida Green

702 N. Carey Street

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

Charlie Green

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 9th day of January 192 8 Issued the 13th day of February, in the year 192 8.

Handwritten signature of Charles 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.

62

Ct. Ct.

1928

Docket

B 68

Charlie Green

vs.

Florida Green

Decree Pro Confesso.

"freak"

B 32712

No.

3

Filed

28 Mar

1928

*Charlie Green*

vs.

*Florida Green*

IN THE  
**Circuit Court**  
OF  
BALTIMORE CITY.

*Mar*

Term, 1928

The Defendant having been duly summoned (~~notified by Order of Publication~~) to appear to the Bill of Complaint, and having failed to appear thereto, according to the exigency of the writ, (said Order).

It is thereupon this *28* day of *March* in the year nineteen hundred and twenty *eight* by the Circuit Court of Baltimore City, ADJUDGED, ORDERED and DECREED, that the complainant is entitled to relief in the premises, and that the bill of Complaint be and is hereby taken pro confesso against the defendant. But because it doth not certainly appear to what relief the Plaintiff is entitled, it is further *Adjudged*, and *Ordered*, that one of the Examiners of this Court, take testimony to support the allegations of the bill.

*Eugene O. Dunning*

DOCKET B. 62/1928

IN THE CIRCUIT COURT

Charles Green

vs.

Florida Green

**DEPOSITIONS**

B No. 32712  
[4]

**PLAINTIFF'S COSTS**

Examiner ..... \$.....  
Copies .....  
Notices .....  
Sheriff .....  
Stenographer .....  
\$

**DEFENDANT'S COSTS**

Examiner ..... \$.....  
Copies .....  
Notices .....  
Sheriff .....  
Stenographer .....  
\$

GEORGE ARNOLD FRICK, Examiner

Filed 16 day of May 1929



.....  
.....  
Charles Green  
.....

vs.

Florida Green  
.....  
.....

In the Circuit Court  
OF BALTIMORE CITY

.....  
.....  
A Decree Pro Confesso having been passed,  
.....

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  
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  
..... 28th ..... day of March ....., 19 28, met on  
the ..... 11th ..... day of April ..... in the year nineteen  
hundred and twenty-..... eight ....., at my office, in the City of Baltimore, in the  
State of Maryland, and assigned the ..... 12th ..... day of April .....  
in the same year at ..... 12.30 ..... o'clock in the after ..... noon 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 Solicitor..... of the  
..... Plaintiff ..... to take the following depositions, that  
is to say:

TESTIMONY taken at the office of George Arnold Frick, Examiner on Thursday April 12th, 1928, at half past twelve o'clock in the afternoon.

Present: George Evans, Counsel for plaintiff.

Thereupon:

CHARLES GREEN, the plaintiff, produced as a witness on his 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- Charles Green, 1113 Harlem Avenue, postal service.

2 Q- You are the plaintiff in this proceeding?

A- Yes, sir.

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

A- About three or four years before we were married - about seven or eight years.

BY MR. EVANS:

4 Q- Mr. Green, were you married by a minister of the Gospel?

Charles Green.

A- Yes, sir.

5 Q- Where?

A- In Baltimore City.

6 Q- Who was it?

A- He was a Baptist minister. I don't know his name.

7 Q- When were you married?

A- On January 15th, 1923.

8 Q- You lived with your wife as husband and wife for how long?

A- Three years and eight months.

9 Q- You separated when - do you know?

A- Sometime in August - around the 28th of August, 1926.

10 Q- How did you always treat your wife?

A- I tried to treat her as a husband should - faithful and chaste.

11 Q- Treated her as a husband should treat a wife?

A- I treated her as a husband should treat a wife.

12 Q- Supported her?

A- Supported her.

13 Q- Give her money for clothing?

A- I gave her money for everything that she wanted.

14 Q- You never had any words or quarrels with her, did you?

Charles Green.

A- No, sir.

15 Q- Are you living together now?

A- No.

16 Q- Who left the other?

A- She left.

17 Q- Why?

A- Well, I don't know - she gave different alibis.

18 Q- You talked to her about it?

A- Yes.

19 Q- Asked her to come back?

A- Yes, I did.

20 Q- Did she want to come back?

A- She didn't want to come back.

21 Q- You charge your wife with adultery with one named Earl Cohen. Tell the Court just what you know about that?

A- After she left I didn't know she was going. I was at work and when I came home on Saturday evening she was gone and she left a note and said she had saved enough money to go to Washington and she would try to get on the stage and that in six months time she would try to give me a divorce.

22 Q- Did you ask her for a divorce?

A- No.

23 Q- Well, then what?

Charles Green.

A- So I saw her the week after that and asked her why and she said she just didn't want to live with me and she told me different alibis and after a while she said she was tired of married life.

24 Q- You charge her with adultery with this boy, Earl Cohen. Do you know him?

A- Yes.

25 Q- You know him when you see him?

A- Yes, sir.

26 Q- Ever seen him in company with your wife?

A- Yes, sir.

27 Q- Tell us just what you have seen of her and Cohen?

A- Well, in the first place I met them at a public dance together. After that I seen them together so many times and then friends said that she and him were beginning to live together.

28 Q- Did you ever trail them?

A- I trailed them.

29 Q- Where from?

A- From the dance hall on McCulloh Street up Pennsylvania Avenue.

30 Q- When was that?

A- In the latter part of October, 1927. The last Saturday, in October, 1927.

Charles Green.

31 Q- You trailed them from the dance hall?

A- Right from the dance hall.

32 Q- They were supposed to be living together?

A- Yes, sir.

33 Q- Where were they living together?

A- On Mosher Street.

34 Q- Did you trail them to Mosher Street?

A- Yes, sir.

35 Q- Where did they go?

A- In to the house.

36 Q- What floor did they go to, if you know?

A- From what I can understand they were living on the third floor because we seen the light up there.

37 Q- Your information was that they were living on the third floor?

A- Yes, sir.

38 Q- After they went in you saw the light go on?

A- Yes.

39 Q- What time of the night was that?

A- Some minutes to one or one o'clock. We waited around until half past two.

40 Q- Were the shades up in the room and the light on?

A- The shades were up when they went in.

41 Q- Do you have any information as to what room they

Charles Green.

entered?

A- I don't know what room but I seen them pull the shades down from the front.

42 Q- Could you see him in the front?

A- I saw her.

43 Q- You saw her?

A- Yes, sir.

44 Q- You are sure it was Florida Green?

A- Yes, sir.

45 Q- The same woman that entered the house with this Cohen boy?

A- The same woman that entered with the Cohen boy.

46 Q- Do you know how many rooms they were occupying?

A- They had the whole apartment. I heard it was three rooms.

47 Q- You stayed there how long?

A- From about a little after one o'clock until half past two.

48 Q- Anybody in your company?

A- Yes, Mr. Marshall Bright.

49 Q- You had him with you for the purpose of trailing your wife?

A- Yes.

50 Q- Had you made any inquiry as to who lived there on the third floor?

Charles Green.

A- Yes, I did.

51 Q- Subsequent to that you had other information and knew of her living at other places, with him?

A- Yes, sir.

52 Q- Tell the Court what you know about it?

A- Well they lived here on Mosher Street. I seen them enter the apartment, and seen the light go on and then it went off.

53 Q- You stayed there until the lights went off?

A- Yes, sir.

54 Q- Did you see her come from the house at all during the time you were there?

A- No.

55 Q- Did you watch the same door they entered?

A- Yes, sir.

56 Q- They didn't come out?

A- They didn't come out.

57 Q- Subsequent to that they lived at another place?

A- Yes, sir.

58 Q- Where?

A- On Lafayette Avenue, 1035 or ten something.

59 Q- Who did they live there with?

A- In an apartment by themselves.

60 Q- Whose house?

A- I don't know.

61 Q- Did they live together on Harlem Avenue?



Charles Green.

A- No, sir, that is where I live.

62 Q- Didn't they live on Carey Street?

A- They live now at 702 Carey Street.

63 Q- What do they occupy, a room or an apartment?

A- They have an apartment. That is where she moved.

64 Q- Did Cohen moved there with her?

A- Yes, sir.

65 Q- They are living together there as man and wife?

A- As man and wife.

66 Q- You have talked to her about this boy Cohen, have you?

A- I didn't say any hing to her about him but from what I heard she told people that she didn't intend to live with me any more.

67 Q- You got a bill from the National Piano Company for a piano, didn't you?

A- Yes, sir.

68 Q- And did you get a letter from the company too?

A- They called me at the Post Office. This man said to me if my name was Green and I told him it was and he said, "When are you going to pay for the piano?" I asked him what piano and he said, "The piano your wife got - isn't your wife's name Florida Green?" I said, "Yes." He said, "Are you going to pay for the piano you bought?" I said, "I haven't bought any."

Charles Green.

Then he said, "You and your wife bought a piano from us." I said, "Who signed for it?" He said, "You signed for it." He said, "Is your name Charles Green?" I said, "Yes." He said, "We have a bill here that you signed." I said, it wasn't mine.

69 Q- Did they give you any description of the man that signed?

A- He asked me if I lived at 1035 or 1025 W. Lafayette Avenue and I told him "No." I said to him, "My wife and I are apart." Then he looked at me and he said, "You don't look like the man that came in and got the piano." He said this fellow was tall, lots taller than me.

70 Q- Does that description fit Earl Cohen?

A- Yes, sir.

71 Q- Then, of course, you didn't have to pay the National Piano Company?

A- No.

72 Q- What did they tell you?

A- He brought a contract to me.

73 Q- Did you recognize your wife's signature on it?

A- Yes.

74 Q- Was the other signature supposed to be the signature of Charles Green?

Charles Green.

A- It was supposed to be mine.

75 Q- Was it your signature?

A- No.

76 Q- Did you ever buy a piano?

A- No.

77 Q- You had nothing to do with it?

A- No.

78 Q- Did that contract show where it was delivered?

A- Yes.

79 Q- At what address?

A- At 1022 W.Lafayette Avenue.

80 Q- Did you ever live at 1022 W.Lafayette Avenue?

A- No.

81 Q- Did he offer to bring him to Court about it?

A- Yes, but I told him I didn't want that to happen.

82 Q- Have you lived or cohabited with your wife since the separation in August, 1926?

A- I have not.

83 Q- Do you think there is any reasonable expectation of your living together again as man and wife?

A- No.

84 Q- Any children born?

A- No.

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

Charles Green.

A- Yes, sir.

86 Q- Have you been for more than two years?

A- Yes, sir.

87 Q- Is your wife a resident?

A- Yes, sir.

88 Q- How long have you lived in Baltimore?

A- Since 1917.

89 Q- Is your wife living in Baltimore now?

A- Yes, sir.

90 Q- And do you know where she is living?

A- At 702 Carey Street.

91 Q- She is supposed to be living there with this man?

A- Yes.

92 Q- She makes no bones that she is living with  
Cohen as husband and wife, does she?

A- No.

-----

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.  
Charles Green

MARSHALL T. BRIGHT, 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- Marshall T. Bright, 1224 Druid Hill Avenue,  
postal employee.

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

A- Yes, sir.

3 Q- How long have you known them?

A- I have known Green since he has been employed  
in the office.

4 Q- How long?

A- About two years and I have known her about the  
same. I was introduced to her by him.

BY MR. EVANS:

5 Q- Mr. Bright, were Mr. and Mrs. Green always known  
and recognized in the community in which they lived as  
man and wife?

A- They were.

6 Q- He charges his wife with adultery?

A- Yes, sir.

7 Q- Do you know anything about the alleged adultery?

Marshall T. Bright.

A- Well, on October 29th, 1927, I was standing in front of the Odd Fellows Hall and Green came out and said to me, "There is my wife." They had been to a dance and he said the fellow with her was Cohen and he told me they had been living together as man and wife and he asked me to go along with him as a witness. So we followed them down to Pennsylvania Avenue and they stopped in a Chinese joint and after they came out they went on and we followed them and they went on down Pitcher Street until they reached Fremont and on Fremont until they reached Mosher and on Mosher Street they entered a house in the 1100 Block and after they went in we saw a light go on up on the third floor.

8 Q- Did you see anybody at the window?

A- I saw Green's wife come to the window and pull the curtain down. I don't know whether she suspected anyone was following them or not but she came and pulled the curtain down. We stood around and waited until two-thirty and neither one came out.

9 Q- They was two-thirty on Sunday morning?

A- Yes, sir.

10 Q- You had been there an hour and a half or two hours?

A- Yes, sir.

Marshall F. Bright.

11 Q- This fellow Cohen went in that house with her?

A- Yes, sir.

12 Q- They went to the third floor?

A- Yes, sir.

13 Q- You saw a light go on <sup>in</sup> the room?

A- Yes.

14 Q- Is that an apartment house?

A- Yes, sir.

15 Q- Have you any information whether they occupied any particular apartment?

A- I know the register in the apartment house showed that Mrs. Green had the third floor.

16 Q- It is a general known thing around about in the circle in which they travel that she is living with this boy Cohen, isn't it?

A- Yes.

17 Q- You have heard so from more than one source, have you?

A- I have.

18 Q- Do you know whether they lived at 1022 W. Lafayette Avenue?

A- No, I don't know that.

19 Q- Do you know whether they live at 702 N. Carey Street?

A- I heard him say that but I am not a witness to



Marshall T. Bright.

that.

20 Q- Have you seen her in company with Cohen since that?

A- Yes, sir, on the street.

21 Q- The same one you saw on the 29th of October, 1927?

A- Yes, sir.

22 Q- How did Green always treat his wife - was he kind, loving and affectionate?

A- As far as I know he was kind, loving and affectionate.

23 Q- Did he treat her as a husband should treat his wife?

A- Yes.

24 Q- Did he give her any cause to leave?

A- No.

25 Q- Do you know whether he attempted to get her to come back and live with him since she left him?

A- I think he did.

26 Q- Has he lived or cohabited with her since he discovered her adultery?

A- No, he has not

27 Q- Is he a resident of Baltimore City, State of Maryland?

A- Yes.

Marshall T. Bright.

28 Q- How long has he lived here?

A- As long as I have known him.

29 Q- Is his wife a resident?

A- Yes, sir.

30 Q- Any children born to them as a result of their marriage?

A- None that I know of.

31 Q- Any reasonable expectation of them living together again as man and wife?

A- No, sir, none.

-----


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.*  
Marshall T. Bright

No other witnesses being named or produced before me, I then at the request of the Solicitor.....of the Plaintiff..... closed the depositions taken in said cause, and now return them closed under my hand and seal on this..... 16th.....day of May.....in the year of our Lord nineteen hundred twenty- nine.....at the City of Baltimore in the State of Maryland.

*George Arnold Frick*  
Examiner. 

There are no..... Exhibits with these depositions, to wit:  
Plaintiff's ..... Exhibit.....

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..... two.....days, on..... both..... of which I was employed by the plaintiff....., and on..... none..... by the defendant.....

*George Arnold Frick*  
Examiner.

Circuit Court

62

1928

B Docket No. 68

Charlie Green

vs.

Florida Green

Order of Reference  
and Report

Syons

B No. 32712  
(67)

Order Filed 16 day of May 1929

Report Filed 28 day of May 1929

Charlie Green

vs.

Florida Green

IN THE  
Circuit Court

OF  
BALTIMORE CITY

May Term, 1929

This case being submitted, without argument, it is ordered by the Court, this 16<sup>th</sup> day of May, 1929, that the same be and it is hereby referred to Wm P Lyons, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

*Wm P Lyons*

**Report of Auditor and Master**

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

Defendant summoned but failed to answer.

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

The marriage proved.

Adultery proved.

Decree pro confesso was passed against the defendant and more than thirty days have since elapsed.

Case ready for decree.

*William P. Lyons*  
Auditor and Master.

May 27, 1929.

1-0

# CIRCUIT COURT

**B** -62  
1928 No. Docket

CHARLIE GREEN

VS.

FLORIDA GREEN

Filed 129 1929

## Decree of Divorce

**B** No. 32712  
(6)

Ed 28 May 1929

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

*William P. Lyons*  
Auditor and Master

IN THE

Circuit Court

OF

BALTIMORE CITY

CHARLIE GREEN

VS.

FLORIDA GREEN

May Term, 1929

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 May, A. D. 1929 by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said CHARLIE GREEN,

the above named Complainant be and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, FLORIDA GREEN.

And it is further Ordered, That the said Complainant, CHARLIE GREEN, pay the cost of this proceeding.

Duffel Howard