

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

B 460  
1928

WILLIAM B. COOPER

VS.

VIS COUNTESS COOPER

1213 W. Lammale

B 33447  
(1)

Mr. Clerk:

Please file.

Henry M. Daniels

ATTORNEY FOR PLAINTIFF

HENRY M. DANIELS, ATTY.  
109 E. Pleasant St.  
Baltimore, Md.

9d 8 Dec 1928

WILLIAM B. COOPER : IN THE CIRCUIT COURT

VS. : OF

VIS COUNTESS COOPER : BALTIMORE CITY.  
*1213 W. Lawrence St* \_\_\_\_\_

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully says:

1. That your petitioner by fraud, deceit and duress, practiced upon him, entered into an alleged marriage ceremony with the defendant on or about the 26th day of August 1927 in Anne Arundel County, State of Maryland, after the father of the said defendant, Isaac Edmonds, had secured a marriage license in the District of Columbia.
2. That at the time of said marriage your petitioner had not reached the age of twenty one years.
3. That your petitioner has never lived with the defendant as man and wife.
4. That the motive, which prompted the alleged marriage was the fear of prosecution in a bastardy case, which offspring is now dead.
5. That the father of defendant still seeks to over awe your petitioner with threats of non support through the channels of the Criminal Court.
6. That your petitioner has now reached the age of twenty-one years and wishes to repudiate the alleged contract of marriage as his privilege in the premises.

7. That both parties are residents of Baltimore City, State of Maryland and have been for more than two years last past.

WHEREFORE your Orator prays that the alleged marriage be declared nul and void-that he may have such other and further relief as the case may require.

May it please your Honor to grant unto your Orator the Writ of Subpoena directed unto the said Vis Countess Cooper commanding her to be and appear in this Court on some day certain to be named therein and perform such decree as may be passed in the premises.

AND as in duty bound.

William B. Cooper.  
Plaintiff

Henry M. Daniels  
SOLICITOR FOR PLAINTIFF

STATE OF MARYLAND, BALTIMORE CITY, to wit:

I HEREBY CERTIFY, that on this <sup>8<sup>th</sup></sup> day of December, in the year one thousand nine hundred and twenty eight, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared William B. Cooper and made oath in due form of law that the matters and facts in the foregoing bill are true to the best of his knowledge and belief.

AS WITNESS my hand and Notarial Seal.

Walter C. Fisher  
NOTARY PUBLIC

ANTHONY J. MEDA  
THE SHERIFFS OFFICE  
The State of Maryland

DEC 6 1928 12 54 PM

George B. Daniel

P 957

Ct. Ct.

B-460  
1928

Docket No.

William B. Cooper  
vs.  
Vis Countess Cooper

1213 - W. handle sk

**SUBPOENA TO ANSWER BILL OF COMPLAINT**

No. B-33447

(2) (3)

Filed 14 Jan, 1929

Henry M. Daniels SOLICITOR

13

Wm Est.  
(Keene)

John E. Patee  
Sheriff

12/10 1928

REISSUED TO January Return Day, 1929  
Charles Whitford  
Clerk

Summoned and a leafy of the Process left with  
the defendant.  
(Keene 1/11/29)  
Dec 10 1928 John E. Patee  
Sheriff

EQUITY SUBPOENA

The State of Maryland

To Vis Countess Cooper,  
1213 W. Lanvale 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 December next cause an appearance to be entered for you and your answer to be filed to the complaint of

William B. Cooper

against you exhibited in the Circuit Court of Baltimore City.

HEREOF fail not, as you will answer the contrary at your peril.

Samuel K. Dennis

WITNESS, the Honorable ~~JAMES P. CORNER~~, Chief Judge of the Supreme Bench of Baltimore

City, the 12th day of November 19 28

Issued the 8th day of December, in the year 19 28

*Chas. H. 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.

460  
IN THE CIRCUIT COURT OF  
BALTIMORE CITY.

B 460  
1928

WILLIAM B. COOPER

Royal Theatre  
Penna. Ave, near Lafayette  
or  
1545 Woodlee St.  
VS.

VIS COUNTESS COOPER

B 33447  
4

RESPONDENT'S ANSWER

Mr. Clerk:

Please file.

J. Stewart Davis

ATTORNEY FOR RESPONDENT

DAVIS & EVANS  
ATTORNEYS AT LAW

Filed 29 Dec 1928

WILLIAM B, COOPER : IN THE CIRCUIT COURT

VS. : OF

VIS COUNTESS COOPER : BALTIMORE CITY.

---

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your respondent answering the Bill of Complaint in the above case exhibited, respectfully says:

- I. That she denies with great emphasis that her father, Isaac Edmonds practiced any deceit, fraud or duress upon the petitioner, William B. Cooper.
2. That she neither admits nor denies the allegations contained in the second paragraph of the Bill of Complaint.
3. That she denies that the petitioner has never lived with or co-habited with her since alleged marriage, but avers that a second child, Clorice Carline Cooper has been born to the respondent of which the complainant, William B. Cooper is the father.
4. That she denies that her father, Isaac Edmonds compelled the marriage of William B. Cooper to the respondent by any threats of bastardy prosecution.
5. That she denies that her father now has issued any improper threats of prosecution for bastardy but avers that he, her father, has only evidenced a very proper desire to procure support from the said William B. Cooper for the aforementioned child, of which he is the father.



6. That she neither admits nor denies that the petitioner is twenty-one years of age, as the only information she has ever had of the petitioner's age is what the petitioner told her.

7. The respondent further avers that the petitioner is employed at The Royal Theatre selling refreshments for which she understands he received a commission of ten per cent; that she understands that he received approximately thirty-five dollars per week; that she is destitute and without the means of defraying the expense of this suit; that she is advised by counsel that she can petition this Honorable Court to allow her a sum certain with which to compensate her Solicitor and a sum certain to be paid her as alimony pendente lite.

WHEREFORE, YOUR RESPONDENT PRAYS THIS HONORABLE COURT TO PASS AN ORDER ALLOWING:

- (a) Alimony pendente lite.
- (b) Permanent alimony.
- (c) Counsel fee.
- (d) Such other and further relief as the case may require.

\_\_\_\_\_  
RESPONDENT

  
\_\_\_\_\_  
ATTORNEY FOR RESPONDENT

STATE OF MARYLAND, BALTIMORE CITY, to wit:

I HEREBY CERTIFY, that on this            day of December in the year one thousand nine hundred and twenty eight, before me, the subscriber, a Notary Public of the State of Maryland in and for the City aforesaid, personally appeared Vis Countess Cooper and made oath in due form of law that the matters and facts in the foregoing answer are true to the best of her knowledge and belief.

WITNESS my hand and Notarial Seal.

\_\_\_\_\_  
NOTARY PUBLIC



Docket B-460  
1928

# Circuit Court

WILLIAM B. COOPER  
Royal Theatre, Penna Ave  
Nr ~~Scranton~~ Lafayette Ave  
or 1545 Woodyear St  
Perron Henry M Daniels  
vs. Pol.

*Vic Countess Cooper*

Order Counsel Fee and Alimony

Pendente Lite

No. B-33447

(5) (6)

*FD 31 Dec 1928*  
*10-14*

*John. E. Potee*  
*Sheriff*

*Wm Est*  
*Bichy*

*Copy of the within Order of Court served  
in William B. Cooper on the 5<sup>th</sup> day February  
1929 in Presence of August J. Bichy*

*John. E. Potee*  
*Sheriff*

*Des 1075*

RECEIVED  
FEB 4 1928  
CLERK'S OFFICE

*and the time for service of a copy of the  
1928*

WILLIAM B. COOPER

vs.

VIS COUNTESS COOPER

—IN THE—

CIRCUIT COURT

—OF—

BALTIMORE CITY

NOVEMBER

TERM

ORDERED BY THE COURT this 31<sup>st</sup> day of December 1928

that the Plaintiff William B. Cooper

pay to the Defendant Vis Countess Cooper

the sum of ~~Five~~ Twenty five Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of Ten

Dollars per week, during the continuance of this suit, to the said Defendant Vis C. Cooper

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 15<sup>th</sup>

day of January 1929, provided a copy of this Order be served on the said Plaintiff

William B. Cooper on or before the 8<sup>th</sup>

day of January 1929

*Raymond Purse*

TRUE COPY—TEST:

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this 4<sup>th</sup> day of February 1929, that the time for showing cause under said Order be extended to the 19<sup>th</sup> day of February 1929, and the time for service of a copy of the same be extended to the 11<sup>th</sup> day of February 1929.

*Wm. B. Cooper*

460

IN THE CIRCUIT COURT  
OF  
BALTIMORE CITY.

WILLIAM B. COOPER

VS.

*B 460  
1929*

VISCOUNTESS COOPER

PLAINTIFF'S ANSWER TO  
PETITION FOR ALIMONY etc.

Mr. Clerk:

Please file.

*B 33447  
(7)*

*Henry M. Daniels*

ATTORNEY FOR PLAINTIFF

*fd 19 Feb-1929*

LAW OFFICES

*Henry M. Daniels -*  
BALTIMORE, MD.

*109 E. Pleasant St.*

WILLIAM B. COOPER

:

IN THE CIRCUIT COURT

VS

:

OF

VISCOUNTESS COOPER

:

HALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of William B. Cooper the plaintiff hereto to the petition of the defendant, Viscountess Cooper for alimony pendente lite, and counsel fee says:

- I. That the plaintiff is unable to comply with the order of the Court.
2. That the plaintiff is a man of no property, real, personal or mixed, but depends for his livelihood on his commission for the sale of articles of food and drink in a Moving Picture Parlor.

Having answered the material allegations and in due time, the plaintiff prays that the petition for alimony pendente lite and Counsel fee be dismissed and the Order of Court thereon vacated.

AND as in duty bound, etc.

*Henry M. Daniels*  
SOLICITOR FOR PLAINTIFF

Henry M. Daniels

B460

Ct. Ct.

1928

No.

Docket

William B Cooper

vs.

Uwcombes Cooper

MOTION FOR HEARING

B 33447  
187

No.

J. Stewart Davis

Filed 19 day of Feb 1929

William B Cooper

vs.

Urs Countess Cooper

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

The respondent by J Stewart Davis

his

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

for hearing on alimony pendente lite

in conformity with the First Equity Rule.

J Stewart Davis

Solicitor for

respondent.

Serve on

J. S. Davis

RECEIVED AT  
THE SHERIFF'S OFFICE

FEB 19 1929 11 29 AM

*Semie admitted  
Feb 19, 1929  
Sheriff's Office*

1 33 PM  
FEB 19 1929

FILED AT  
SHERIFF'S OFFICE

CIRCUIT COURT

Mr. Clarence Cooper

Ct. Ct.

460  
192 8 No. B-68 Docket

Cooper

vs.

Cooper

**NOTICE OF HEARING**

B-No. 33447  
(9)

No.

Filed 19 day of Feb. 1929

X

*Copy of the within Notice served on J. S. Davis solicitor  
on the 19th day of February 1929 in the presence of  
Frank A. Brudacz*

*John E. Potter  
Sheriff*

*Two \$0.75*

When received in due course on said calendar

WALTER R. WHITFIELD



William B. Cooper

vs.

Vis Countess Cooper

IN THE

**CIRCUIT COURT**

OF BALTIMORE CITY

Upon application made by the Solicitor for the

respondent

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

when reached in due course on said calendar.

CHARLES R. WHITEFORD

*Clerk Circuit Court.*

Henry M Daniels  
109 E. Pleasant

**CIRCUIT COURT**

B460  
19 28

Docket No.

William B Cooper  
VS.

Dec Countess Cooper

(1)

**PETITION AND ORDER TO  
TAKE TESTIMONY UN-  
DER 30th RULE**

No. 33 447  
(10)

Fd. 19 Feb 1929

J. Stewart Davis

RECEIVED AT  
CIRCUIT COURT  
BALTIMORE CITY  
FEB 19 1929 4 06 PM

Copy of the within Petition and Order of Court  
Served on Henry M Daniels on the 20th day of  
February 1929 in the Presence of Frank A Budenz

Dec 107  
J. M. E. Potter  
Shuff

William B Cooper

VS.

Ues counters Cooper

IN THE  
Circuit Court  
OF  
BALTIMORE CITY

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

The plaintiff in this case respectfully shows unto your Honor:

THAT he desires to examine orally, in open Court and in the presence of your Honor, certain witnesses who can testify to the facts and matters relevant to the allegations in the Bill of Complaint filed in this case.

Your petitioner therefor prays your Honor to pass an order, according to the Statutes for such case made and provided.

And as in duty bound will ever pray.

J Stewart Davis

Solicitor for Plaintiff  
respondent.

Upon the foregoing Petition and Application it is this 19<sup>th</sup> day of February, A. D., 1929, Ordered that the petitioner have leave to take testimony as prayed and that the testimony to be offered be taken as required by the 30th Rule of this Court. And it is further Ordered that a copy of this petition and order be served on the Plaintiff or his Solicitor, on or before the 1 day of March 1929

W. H. Hous

460-1928

# Circuit Court

B460

1928. **B**

No.

Docket

William Cooper

vs.

Wescounters Cooper

Final Order, Counsel Fee and Alimony  
*Pendente Lite.*

No. 33447 B  
417

Filed 11 March 1929

IN THE  
Circuit Court  
OF  
BALTIMORE CITY.

William Cooper

vs.

Viscountess Cooper

Term, 19.....

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 11 day of March 1929, that the Plaintiff, William Cooper pay to the defendant, Viscountess Cooper the sum of ~~..... Dollars, as counsel fee~~

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

~~further~~ pay the sum of Three Dollars per week, to the said Viscountess Cooper

as Alimony **pendente lite** accounting from the 11 day of March 1929

and continuing until the 11<sup>th</sup> day of May, 1929, (should this suit be

so long pending) or until the further order of this Court.

*W. H. Wood*

Ct. Ct.

460 ~~B~~  
1928

Docket

Wm Cooper

vs.  
Viscountes Cooper

SUMMONS FOR WITNESSES

Mr. Clerk please  
file etc.

Henry M. Daniels  
att. for Plff.

No.

B 33447  
(12)

Filed 10 day of April 1929

RECEIVED AT  
THE CLERK'S OFFICE ON

APR 10 1929 12 23 PM

# IN THE CIRCUIT COURT OF BALTIMORE CITY

Term, 19 \_\_\_\_\_

The Sheriff will please summon the following witnesses,

returnable Friday April 12 - '29 at 10 A. M.

14 <sup>sd</sup> Jench Wright  
603 Gold St.

13 Isaac Edmonds <sup>sd</sup>  
1213 W. Lantvale St

13 Rev. Mr. Taylor <sup>sd</sup>  
8 11 N. Stricker St.

to testify for the Plaintiff

in the case of Cooper vs. Cooper

Chas R Whiteford  
Clerk of Circuit Court of Baltimore City



B 496  
19 28

Ct. Ct.

Docket \_\_\_\_\_

William Cooper

vs.

Vis Countess Cooper

**SUMMONS FOR WITNESSES**

No. B 33447  
(13)

Filed 11<sup>th</sup> day of April 19 29

APR 11 1929 3 48 PM

THE SH...

# IN THE CIRCUIT COURT OF BALTIMORE CITY

March Term, 19 29

The Sheriff will please summon the following witnesses,

returnable Friday April 12<sup>th</sup> 1929 at 10 A. M.

WILLIAM COOPER

:

IN THE CIRCUIT COURT

VS.

:

OF

VISCOUNTESS COOPER

:

BALTIMORE CITY.

Mr. Clerk:

Please issue summons for the following to appear before this Honorable Court at 10 A.M. Friday, April 12, 1929.

14

<sup>sd</sup> RANDOLPH SAUNDERS, 1732 N. Calhoun St.,

*Steward Davis*

to testify for Defendant  
in the case of Cooper

vs.

Cooper

Chas R Whiteford

Clerk of Circuit Court of Baltimore City



WILLIAM COOPER

IN THE CIRCUIT COURT

VS.

OF

VISCOUNTESS COOPER

BALTIMORE CITY.

Mr. Clerk:

Please issue summons for the following to appear before  
this Honorable Court at 10 A.M. Friday, April 12, 1929.

14 RANDOLPH SAUNDERS, 1732 N. Calhoun St.,

*J. Steward Davis*  
ATTORNEY FOR DEFENDANT

B496  
1928

Ct. Ct.

Docket \_\_\_\_\_

Looper

vs.

Looper

**SUMMONS FOR WITNESSES**

33,447  
(14)

B No. 33408

Filed 12<sup>th</sup> day of April 1929

APR 12 1929 12 33 PM

# IN THE CIRCUIT COURT OF BALTIMORE CITY

\_\_\_\_\_ Term, 19

The Sheriff will please summon the following witnesses,

returnable Immediately at 10 A. M.

by Rev. Mr. George W. Taylor  
711 N. Stricker St. W E

to testify for Plaintiff

in the case of Hooper vs. Hooper

Chas. K. Whiteford  
Clerk of Circuit Court of Baltimore City

711 - W. Sturke St.

Circuit Court of Baltimore City

Boyer  
vs.  
Boyer

Mr. Rev. Geo W. Taylor Term, 1929

You are hereby summoned to attend this Court,

on Friday the 12<sup>th</sup> day of April 1929, at 10 o'clock  
A. M., to testify for Plaintiff

By order of the Court,

JOHN E. POTE, Sheriff of Baltimore City

Baltimore, 4/12/1929

Be punctual in attendance or you will be attached.  
FLOOR 2, ROOM 214, COURT HOUSE

Deputy No. 13



name east

Does not live at 711

N. Stricker St. not at

name at 811-N. Stricker St

Keene

In The Circuit Court  
of 460-1928  
Baltimore City.

William Cooper

vs

Viscountess Cooper

B 33447  
(15)

Order of Dismissal

Wt Clerk please file

Stewart Day

79 12 April 1929

William Cooper  
vs  
Misses Cooper

In The Circuit  
Court of Baltimore  
City

This cause standing ready for hearing and being submitted on the testimony of witnesses for the respective parties in open Court, and being submitted the counsel for the parties were heard and the proceedings read and considered, It is therefore on this 12<sup>th</sup> day of April 1929, by the Circuit Court of Baltimore City, adjudged, ordered and decreed that the Bill of Complaint filed in this case be, and the same is hereby dismissed, the Complainant to pay the costs,

Wm. H. Young