

B704/1946

In the Circuit Court No. 2
of Baltimore City.

Gus D. Taylor

vs.

Eva Taylor

514 Dolphin St

BILL OF COMPLAINT

Mr. Clerk:

Please file.

No 275190 B

M. C. Angelmier
Solicitor for Plaintiff.

O'MARA, ANGELMIER, PODLICH & ARNOLD

ATTORNEYS AT LAW

615-616 MUNSEY BUILDING

S. E. COR. CALVERT AND FAYETTE STREETS

BALTIMORE

Sept 15th September 1946

Gus D. Taylor :
vs. : In the Circuit Court No. 2
Eva Taylor : of Baltimore City

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Bill of Complaint of the Plaintiff respectfully shows unto Your Honor as follows:

1. That Your Orator was married to the Defendant, Eva Taylor, on November 4, 1918, at Roanoke, Virginia, by a Minister of the Gospel.

2. That Your Orator has been a resident of Baltimore City, State of Maryland, for more than two years last past.

3. That there are no children living as a result of this marriage between Your Orator and the Defendant.

4. That the Defendant, Eva Taylor, abandoned and deserted Your Orator in the City of Baltimore on August 5, 1923 without any just cause or reason; therefor; that said abandonment has continued uninterruptedly since said date; was the final and deliberate act of the Defendant, and there is no reasonable hope or expectation of reconciliation between the parties hereto.

Wherefore Your Orator prays:

(a) That he may be decreed a divorce a vinculo matrimonii, from the Defendant, the said Eva Taylor;

(b) And for such other and further relief as to Your Honor, in the premises may deem mete and proper.

May it please Your Honor to grant unto Your Orator the State writ of subpoena directed unto the Defendant the said Eva Taylor residing at 719 Dolphin Street, Baltimore city, Maryland, commanding her to be and appear in this Honorable Court

on some certain day to be therein mentioned, to do, perform and abide by any decree which may be passed in the premises.

As in duty bound, etc.

In C. Anglin
Solicitor for Plaintiff.

Gus D. Taylor
Plaintiff.

State of Maryland, City of Baltimore, to wit:

I hereby certify that on this 14th day of September, 1926 before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared Gus D. Taylor, Complainant in the above Bill of Complaint, and he made oath in due form of law, that the matters and facts set forth in said bill are true to the best of his knowledge and belief.

As witness my hand and Notarial Seal:

Edna Mae Steedman
Notary Public.

P 382

Ct. Ct. No. 2

704
1926

B

Docket No. 35

Taylor
vs.

Taylor

519 Wolfman St

Subpoena to Answer Bill of Complaint

Paid

No. 27590 B
2

Copies Copied

Filed 2 October, 1926

M. B. Angelus

Solicitor.

10

Summons and a copy of the Process
left with the defendant

Buckley
9/25/20

John. E. Ptee
Sheriff

Fee \$0.80

10 10 20

Miss
7 Glen Latrobe
Stokes

EQUITY SUBPOENA

The State of Maryland

To

Eva Taylor
719 Daphne 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

Geo D. 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 14th day of September, 1926
Issued the 15th day of September, in the year 1926

John Pleasants
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.)

IN THE CIRCUIT COURT NO. 2

OF

BALTIMORE CITY

13704
1926

GUS D. TAYLOR

1212 Madison Ave

VS.

EVA TAYLOR

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

Davis & Evans

ATTORNEYS FOR RESPONDENT

No 27590 B
3

DAVIS & EVANS

ATTORNEYS AT LAW

Filed 28th Sept 1926

GUS D.TAYLOR : IN THE CIRCUIT COURT NO.2

VS. : OF

EVA TAYLOR : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the Bill of Complaint in the above entitled case, respectfully says:

- (1) That she admits the allegations contained in the first, second and third paragraphs of the plaintiff's bill of Complaint.
- (2) That she denies the allegations contained in the fourth paragraph of the plaintiff's Bill of Complaint.
- (3) That your respondent 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 some certain amount to compensate her solicitor. The plaintiff is employed and earns one hundred dollars per month.

Wherefore your respondent prays that the Bill of Complaint be dismissed with costs to the plaintiff.

Davis Evans

ATTORNEYS FOR RESPONDENT

Served on
Gus D. Taylor
1212 Madison Ave

35 B Docket ⁷⁰⁴/₁₉₂₆

CIRCUIT COURT No. 2

Taylor

vs.

Taylor

1212 Madison

Order Counsel Fee and Alimony
Pendente Lite
Husband Plaintiff

ORDER

No. 27570 B.

(H)

Copied Copied

Filed 25th Sept 1926

10

Copy of the within Order of Court served on
Gus D. Taylor on the 29th day of September
1926 in the Presence of agent J. B. Bueby

John. E. Potter
Sheriff

New \$0.50

Cle

Gus D. Taylor

IN THE

CIRCUIT COURT No. 2

vs.

OF

Eva Taylor

BALTIMORE CITY

September, TERM, 1926

ORDERED BY THE COURT, this 28th day of September 1926

that the Plaintiff Gus D. Taylor

pay to the Defendant Eva Taylor

the sum of twenty-five Dollars as Counsel Fee for the

Solicitor of the Defendant, and that he further pay the sum of eight

Dollars per week, during the continuance of this suit, to the said Defendant

Eva Taylor

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 14th

day of October 1926, provided a copy of this Order be served on the said Plaintiff

Gus D. Taylor on or before the 4th

day of October 1926

James P. Gordon

TRUE COPY—TEST:

\$100. per month
for alimony

rk.

B704/1946

In the Circuit Court No. 2.
of Baltimore City.

Gus. D. Taylor

vs.

Eva Taylor.

ANSWER

Mr. Clerk:

Please file

No 27590 B
5

Matthew C. Cuyler
Solicitor for Plaintiff.

O'MARA, ANGELMIER, PODLICH & ARNOLD

ATTORNEYS AT LAW

615-616 MUNSEY BUILDING

S. E. COR. CALVERT AND FAYETTE STREETS

BALTIMORE

Filed 16th October 1946

Gus D. Taylor :
vs. : In the Circuit Court No. 2
Eva Taylor : of Baltimore City.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Answer of the plaintiff, Gus D. Taylor, to the Petition heretofore filed by the defendant, Eva Taylor, for the allowance of counsel fee and alimony, and the order of Court passed thereon, dated September 28, 1926, respectfully shows unto Your Honor as follows:

1. That it is impossible for Your Respondent to comply with the order of Court, for the allowance of alimony, pendente lite, and counsel fee, to the defendant, Eva Taylor, as he is without adequate means of doing so.

WHEREFORE, Your Respondent prays that the order passed on said petition may be rescinded and the petition dismissed.

As in duty bound, etc.,

Gus Taylor
Plaintiff.

Matthew C. Baylmer
Solicitor for Plaintiff.

State of Maryland, City of Baltimore, to wit:

I hereby certify, that on this 13th day of October, 1926, before me, the subscriber, a Notary Public, of the State of Maryland, in and for the City of Baltimore, personally appeared Gus D. Taylor, and he made oath in due form of law that the matters and facts set forth in the foregoing Answer are true to the best of his knowledge and belief.

Witness my hand and Notarial Seal

Willis Podell
Notary Public.

McC Angelucci

190 /

✓

11

Cir. Ct. No. 2

704

1926

Docket No.

B35

Geo Taylor 704

vs.

Eva Taylor

MOTION FOR HEARING

No. 27590 B
5

Filed, 25th October 1926

Davis and Evans

Gus Taylor
vs.
Eva Taylor

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

The Defendant by Dairs & Evans

Solicitor, applies to have the above entitled cause placed in the
Trial Calender for hearing on alimony & counsel fee

In conformity with the First Equity Rule.

Dairs & Evans
Solicitor for Defendant

Serve on

M. C. Angelweier
Solicitor

Copy admitted
by service

M. C. Angelweier

for E. T. Mars
Oct 26 1926

516
Munsing

30

Cir. Ct. No. 2

404
1926

B

Docket No. 35

Taylor

vs.

Taylor

NOTICE AS TO HEARING

No. 24590 B
6

Copy Copied

Filed 25th October, 1926

H

Copy of the within Notice served on M. C. Angelweier
Solicitor on the 26th day of October, 1926, in the
presence of Louis Hecht.

John E. Potter
Sheriff

New \$0.50

Geo D Taylor
vs.
Eva Taylor

IN THE
CIRCUIT COURT, No. 2
OF
BALTIMORE CITY.

Upon application made by the Solicitor for the *Defendant*
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 *Always and*

Courses fee

when reached in due course on the said calendar.

JOHN PLEASANTS,

Clerk Circuit Court No. 2.

Circuit Court No. 2

204
1926

Docket 35B

Gas Taylor

vs.

Eva Taylor

Fisher

Petition for leave to take
Testimony and Order of
Court thereon

No. 27590B
4

Filed 29. November 1926

Geo Taylor

vs.

Eva Taylor

IN THE

Circuit Court No. 2,

OF

BALTIMORE CITY.

**To the Honorable the Judge of the
Circuit Court No. 2 of Baltimore City:**

THE PETITION OF *Plaintiff*

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

M. C. Angelman
Solicitor for

ORDERED, this *29* day of *November* 192*6*, 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.

W. H. F. [Signature]

Docket B.704/1926

IN THE CIRCUIT COURT No. 2

Gus D. Taylor

vs

Eva Taylor

DEPOSITIONS

No. 27590 B

PLAINTIFF'S COST

Examiner _____ \$ _____

Copies _____

Notices _____

Sheriff _____

Stenographer _____

\$ _____

DEFENDANT'S COSTS

Examiner _____ \$ _____

Copies _____

Notices _____

Sheriff _____

Stenographer _____

\$ _____

GEORGE ARNOLD FRICK, Examiner

Filed 9th day of Dec 1926

Gus D. Taylor

vs.

Eva Taylor

In the Circuit Court No. 2
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
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
29th day of November, 1926., met on
the first 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 second day of December
in the same year at two 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 Thursday December 2, 1926 at 2 o'clock in the afternoon.

Present: M.C. Anglemier, Counsel for the Plaintiff.

George W. Evans, Counsel for Defendant.
Thereupon:

GUS D. TAYLOR, the plaintiff, 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- Gus D. Taylor, 1212 Madison Avenue, Janitor.

2 Q- You are the plaintiff in this proceeding?

A- Yes, sir.

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

A- For about 8 years.

BY MR ANGELMIER:

4 Q- When, where and by whom were you married?

A- On November 4th, 1918 in Roanoke, Virginia by the Reverend Brown, a Methodist minister.

5 Q- How long did you live together after you were married.?

Gus D. Taylor

A- About two years.

6 Q- About two years?

A- Yes, sir, you see, I was in the Army when I got married.

7 Q- After you returned from the army you lived with her about two years?

A- Yes, sir.

8 Q- How old were you at the time of your marriage?

A- Twenty-four.

9 Q- How old was your wife?

A- She was about 15 years older than me.

10 Q- When did your wife abandon and desert you?

A- In August, 1923.

11 Q- What was the cause of the abandonment?

A- Well, she claimed that she just couldn't get along and that I wasn't making enough money to support her.

12 Q- What did she say to you at the time?

A- She told me to get out or she would do something to me in my sleep.

13 Q- What did she mean by that?

A- She would either cut me or shoot me in my sleep.

14 Q- You mean to say that your wife told you that if you didn't get out she would get you if she had to get you in your sleep. You thought she would take your life?

A- Yes, sir.

Gus D. Taylor.

15 Q- Did she ever threaten to take your life before?

A- No, no more than that time. I didn't give her chance to.

16 Q- Did you talk to her at that time and ask her to think it over?

A- Yes, sir, she said "nothing doing, she wouldn't try it again?"

17 Q- She said she was done with you?

A- Yes, sir.

18 Q- After this abandonment and desertion in August 1923, when did you move to Baltimore?

A- In August, 1923.

19 Q- How long have you been a resident of the State of Maryland?

A- Since August, 1923, continuously.

20 Q- Did you ever have any conversation with your wife relative to living with her again?

A- Yes, sir.

21 Q- What did she say?

A- "No she wouldn't want to be bothered with me any more." That is what she said to me.

22 Q- Has the abandonment been continuous and uninterrupted since that time? The time of your separation?

A- Yes, sir.

23 Q- Was it her deliberate and final act?

Gus D. Taylor

A- Yes, sir.

24 Q- Is it beyond any reasonable hope of a reconciliation?

A- Yes, sir.

25 Q- As what is your wife employed at present time?

A- I really don't know. I think she is a cook.

26 Q- Were there any children born as a result of this marriage?

A- No, sir.

27 Q- What has been your conduct towards your wife during your married life?

A- I was a good, faithful husband. I did the best I could.

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 Guy. W. Taylor*

WINFIELD DORSEY, 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- Winfield Dorsey, 1100 McCollough Street, Butler.

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 him about three years and her about a little over a year.

BY MR. ANGELMIER:

4 Q- Do you remember when Mr. Taylor first came to Baltimore?

A- I do not remember exactly. I knew him a couple of weeks after he came in the city.

5 Q- Where did he work?

A- On Cathedral Street.

6 Q- Where do you work?

A- I work at 1010 Cathedral Street.

7 Q- How far away from you does he work?

A- About 3/4 of a block away.

8 Q- Did you ever have any conversation with Mr. Taylor about his wife?

Winfield Dorsey.

A- Yes, sir.

9 Q- What was the nature of that conversation?

A- He told me that he was married and he said that him and his wife were separated and I asked him if he would go back with his wife and he said yes.

10 Q- Did you ever have any conversation with Mrs. Taylor about it?

A- Yes, sir.

11 Q- What was it?

A- We all went to the same Church and he showed his wife to me. I asked her if she would go back to Mr. Taylor and she said "no".

12 Q- All of you went to this same church?

A- Yes, sir.

13 Q- You met Mr. Taylor a couple weeks after he came to Baltimore in August, 1923. How often have you been in his company?

A- Oh-h lots of times.

14 Q- Most every week?

A- Yes, sir.

15 Q- Has the abandonment been continuous and uninterrupted?

A- Yes, sir.

16 Q- Was it her deliberate and final act?

A- Yes, sir.

Winfield Dorsey.

17 Q- Is it beyond any reasonable hope or expectation of a reconciliation?

A- Yes, sir, because I talked to Mrs. Taylor and she said she wouldn't live with him any more.

18 Q- Has Mr. Taylor been a resident of Baltimore City and the State of Maryland for more than two years prior to the filing of this Bill which was on September 15, 1926?

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 Winfield D. D. D.*

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.....9th.....day of December..... in the year of our Lord nineteen hundred twenty-six.....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.

Cir. Ct. No. 2.

704
1926

Docket No. 3513

Gus D Taylor

vs.

Eva Taylor

SUBMISSION FOR DECREE.

Mr. Clerk,
Please file,

W. C. Campbell

Solicitor for Plaintiff.

No. 27590 B
9

Filed 15 December 1926

Geo D Taylor

vs.

Eva Taylor

**In the Circuit Court No. 2
of Baltimore City.**

.....TERM, 192.....

To the Honorable

.....
Judge of the Said Court:

The above cause is respectfully submitted
for decree and the 41st General Equity Rule is hereby waived.

M. C. Angelinas

.....
.....
.....
Solicitor for Plaintiff,

David R. Rums

.....
.....
.....
Solicitor for Defendant.

Ct. Ct. No. 2

704
1926

Docket No. B 35

Gus Taylor

vs.

Eva Taylor

Order of Reference
and Report

Lynn

No. 27590 B
10-11

Order Filed 15th day of Dec 1926

Report Filed 17th day of Dec 1926

Lus Taylor

vs.

Eva Taylor

IN THE
Circuit Court No. 2

OF
BALTIMORE CITY

November Term, 19 *26*

This case being submitted, without argument, it is ordered by the Court, this *15th* day of *December*, 19*26*, that the same be and is hereby referred to *William P. Lyons*, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Charles F. Shum

Report of Auditor and Master

Bill for divorce a vinculo matrimonii filed by the husband against his wife 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 proven.

The marriage proven.

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

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

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

Case ready for decree.

William P. Lyons

Auditor and Master

December 16, 1926

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

William P. Lyons
Auditor and Master

Circuit Court No. 2

B ⁷⁰⁴ 192 6 No. Docket

GUS D. TAYLOR

vs.

EVA TAYLOR

DECREE OF DIVORCE

W.P.

R

No. *27590 B.*
2127

Copy Copied

Filed *21st* January, 1927

DECREE OF DIVORCE.

GUS D. TAYLOR

VS.

EVA TAYLOR

IN THE

Circuit Court No. 2,

OF

BALTIMORE CITY

January
November

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 *twenty-first* day of *January*, Anno Domini, one thousand nine hundred and *twenty-seven* by the CIRCUIT COURT No. 2 OF BALTIMORE CITY, *Adjudged, Ordered and Decreed*, that the said GUS D. TAYLOR,

the above named complainant be, and he is hereby DIVORCED A VINCULO MATRIMONII, from the defendant, EVA TAYLOR.

And it is further Ordered, that the said Complainant, Gus D. Taylor, pay the cost of this proceeding.

Robert F. Stanton

I, JOHN PLEASANTS, Clerk of the Circuit Court No. 2 of Baltimore City, do hereby certify that the above is a true copy of the decree taken from the record of proceedings in said cause.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of the said Court, this _____ day of _____ 1927

Clerk Circuit Court No. 2 of Baltimore City.