

In the
Circuit Court of
Baltimore City

15
1926

The Baltimore Annual Confer-
ence of the Evangetical
Methodist Church, Inc.
Plaintiff

VS

John B. Watkins,
Defendant.

230 Forest St

Bill for an Injunction,
restraining the defendant etc

Mr. Clerk,

Please file and issue
issue as prayed when the
Court passes the order etc.

W. R. Elliott
Solicitor for Complainant.

a 14064
21)

G. L. PENDLETON
ATTORNEY AT LAW
14 E. PLEASANT STREET
BALTIMORE, MD.

FILED

11 January 1926

The Baltimore Annual	*	
Conference of the	*	
Evangetical Methodist	*	
Church of Baltimore City,	*	
Incorporated.	*	In the Circuit Court
Plaintiffs,	*	
	*	of
vs	*	
	*	Baltimore City
John B. Watkins,	*	
Defendant,	*	

To the Honorable, the Judge of said Court:

1. The plaintiff is an incorporated body corporate, duly incorporated under and by virtue of the General Laws of the State of Maryland.
2. That among the stated objects of the said corporation as for a body are for "the maintenance of houses of religious worship and general educational educational work; and of moral and right living among mankind"
3. That the plaintiff operates through men regularly qualified and ordained ministers in said church, having Stations that is regular churches from whom, the ministers in charge, all money collected for the purposes of maintenance and support of the general church during one year after an appointment is given; said money is then reported to the Annual Conference, the plaintiff, in accordance to the acknowledged discipline of the whole church connections.
4. That the Reverend John B. Watkins, a minister was duly appointed to take charge of a Station located at 313 Forrist Street, Baltimore City, Maryland on or about the 18th day of June 1920; that at the Annual Conference held on or about the 18th day of June 1925, a report for the work of the charge given to the said John B. Watkins, was duly called for, but instead of a report having been made by the said Reverend John B. Watkins, a formal resignation in writing was tendered the Plaintiff and accepted, together with his credentials and all other things including the Book of Discipline all of which are herewith filed

marked Plaintiff's Exhibit No. 1/^{except the Book of Discipline}and prayed to be taken as part of the Bill of Complaint.

5. That after the acceptance of resignation of the Reverend John B. Watkins, the defendant, by the plaintiff, a demand has long since been made upon the defendant to return the property, the furniture and that he to vacate from the premises, 313 Forrest Street, Baltimore City, Maryland, but that said Watkins has refused to surrender the premises and property to the plaintiff; the plaintiff having made all reasonable demands for the return of said property and possession of the said church, in a peaceable and quiet manner, but all reasonable demands are refused, that the only means by which possession and rights of the plaintiff can be enforced, the plaintiff is advised is a writ of an injunction, restraining the said John B. Watkins, defendant, from any way interfering with the possession of the premises and property of the plaintiff.

The plaintiff will ever pray:

(a) That an injunction be issued or a restraining order against Reverend John B. Watkins upon such terms and conditions and seems wise to the Court in the premises.

(b) That a report be made if the money collected during the year 1925 so that a completed report can be made of the returns required under the law of the church. And such other and further relief as the plaintiff's require.

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

And as in duty bound etc.,

H. L. Dudder

State of Maryland

SS : -

City of Baltimore,

I hereby certify that on this ^{10th} day of *January* 1926, before me the subscriber a *Notary Public* of the State of Maryland in and for said city, personally appeared *George E. Cooper* President of The Baltimore Annual Conference of the Evangetical Methodist Church, Inc., and made oath indue form of law that the matters and things set out in the aforegoing are true to the best of his knowledge and belief.

Witness my hand and Notarial Seal.

Caroline Murray
Notary Public.



In the Circuit Court of
Baltimore City

15
1/19/56

The Baltimore Annual Conference of the Evangelical Methodist Church, Inc.

vs

John B. Watkins,

Pleasantiff's Exhibit No. 1

A/H 064
Mr. Lick (2)
Please file
with the Bell to
G. L. P. Sobers

FILED

11 " January 1956

Elders' Credentials.

To whom it may Concern, Greeting:

Be it known, that Rev. Rev. John B Watkins
having been duly elected by the Annual Conference of Ministers and Delegates, was ordained for the office of Elder, in the Evangelical Methodist Church, so long as his Life and Doctrine accord with the Holy Scriptures, to administer the Lord's Supper; to Baptize; to Celebrate Matrimony, and to feed the flock of God, taking the oversight, not as a Lord over Gods Heritage, but being an example to the flock.

Signed by order, and in behalf of the *Evangelical Methodist*
Annual Conference

Rev Geo E. Cooper _____ President
Rev J. W. Hodges Secretary.

May 24 - . . 19*02*0

EVANGELICAL METHODIST CHURCH

McELDERRY & SOMERSET STS.

REV. JOHN B. WATKINS, Pastor

643 ENSOR STREET

BALTIMORE, MD.

Balto June 19th/25

I John B. Watkins

do hereby resign from the
Evangelical Methodist Conference
& its connections here with
your Credentials & Book of
Discipline

Signed

John B. Watkins

P 382

Ct. Ct.

A 15
1926 Docket No.

The Baltimore Annual Conference
of the Evangelical Methodist
Church, Inc.

vs.

John B. Watkins

330 Forrest St

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

A 14064

(3)

Filed 18th January, 1926

G. L. Pendleton

SOLICITOR

3

Summons John B. Watkins and a copy of the Process left
with the Defendant
Buck
1/10/26
Geo. J. O. S.
Sheriff

EQUITY SUBPOENA

The State of Maryland

To John B. Watkins
(330 Forrest 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 February next cause an appearance to be entered for you and your answer to be filed to the complaint of

The Baltimore Annual Conference of the Evangetical Methodist Church, Inc.

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 11th day of January 1926
Issued the 11th day of January, 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.

15
a 1986

The Badio Annual
Conference of the
Evangelical
Methodist Church
Inc.

vs.
Watkins
(1) vs (2)

a 14064
(4)

Jan 11th January 1986

copy of the within Order of Court served on John D. Watkins
on the 18th day of January 1986 in presence of Adam S. Buck
John E. PACE
Sheriff
Recd \$0.50

Upon the foregoing Bill of Complaint and Exhibit , it is
ORDERED by the Circuit Court of Baltimore City this 11th
day of *January*, 192*6*. that the Exparte application for

an injunction

herein stand for hearing on the 14th day of *January*, 192*6*
at 9.30 o'clock a.m.

And it is further ORDERED that until said hearing the defendant

be and *is* hereby restrained *from interfering with the property of the Plaintiff* as prayed in said Bill of Complaint
And it is further ORDERED that a copy of this Order be served on
the defendant

forthwith

E. J. [Signature]

IN THE CIRCUIT COURT OF

BALTIMORE CITY. ¹⁵

66a-119261976

THE BALTIMORE ANNUAL CONFERENCE OF THE EVANGELICAL METHODIST CHURCH OF BALTIMORE CITY, INCORPORATED

VS.

JAMES B. WATKINS

A 14060

Mr. Clerk:-

15

Please file.

Davis & Evans

ATTORNEYS FOR DEFENDANT

*Serving as directed by
16, 1926
A. H. H. H. H.*

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

Filed 16th January 1926

THE BALTIMORE ANNUAL CON-
FERENCE OF THE EVANGELICAL
METHODIST CHURCH OF BALTI-
MORE CITY, INCORPORATED

: IN THE CIRCUIT COURT

VS.

OF

JOHN B. WATKINS

:

BALTIMORE CITY

The defendant demurs to the plaintiff's bill and
for cause of demurrer shows,

1. That the plaintiff has not stated in its bill such
a case as entitles him to any relief in equity against the
defendant.

2. That the plaintiff's bill is bad in substance and in
law.

John B. Watkins

Quinn & Evans

SOLICITORS FOR DEFENDANT.

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY that on this 15th day of January, in the
year nineteen hundred and twenty six, before me, the subscriber,
a Notary Public of the State of Maryland, in and for the City of
Baltimore aforesaid, personally appeared John Watkins, the de-
fendant in the above case and made oath in due form of law that
the demurrer filed by him therein is not entitled for delay.

AS WITNESS my hand and Notarial Seal.

Helena C. Fisher
NOTARY PUBLIC.

