

*Sumner*  
*Defendants*

*Sumner & Charles*  
*S.E. corner*

IN THE CIRCUIT COURT OF

BALTIMORE CITY

*A 236*  
*1926*

ROBERT RICHARDSON

VS.

THE CENTRAL SAVINGS BANK  
and NANCY HENDERSON

PETITION & ORDER THEREON

*(2)*

Mr. Clerk:-

Please file.

*Davis & Evans.*

ATTORNEYS FOR PLAINTIFF

*A 14276*  
*(2X3)*

J. STEWARD DAVIS  
ATTORNEY AT LAW  
215 SAINT PAUL PLACE  
BALTIMORE, MD.

*Fl. 19<sup>th</sup> May 1926*

BAUMGARTEN & CO., INC.

*Service of copy admitted this 22nd day of May 1926*

*W. Robbie Howard Rice*  
*Sol. for Nancy P. Henderson*

*Copy of the within Petition and Order of Court served on the Central Savings Bank, a Corporation, by service on J. H. Houch, Assistant Treasurer on the 19th day of May, 1926 at 12 o'clock P. M. in the presence of John Morgan. Also copy of the within Petition and Order of Court served on W. A. Caldwell Hawkins, Solicitor for Nancy Henderson on the 22nd day of May, 1926 at 11 o'clock A. M. in the presence of Albert E. Puckler.*

*John E. Potee*  
*Shelf*

*Fee \$1.00*

ROBERT RICHARDSON : IN THE CIRCUIT COURT

VS. : OF

THE CENTRAL SAVINGS BANK  
and NANCY HENDERSON : BALTIMORE CITY.

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully says:

1. That in the month of October, 1907 he was married to Lena Richardson in Baltimore City. That on or about the 14th day of May, 1926 the said Lena Richardson departed this life. That there are also five children, Waddel, age seventeen; Robert, age sixteen; Ella, age fourteen; Jessie, age eight and Edward, age five, surviving her.
2. That your Orator has always been regularly employed and as a result of said employment he was able to support his family and also to save some part of his earnings.
3. That shortly after the marriage of the Orator and the late Lena Richardson, your Orator instructed the said Lena Richardson, deceased to open an account at the Central Savings Bank, in their joint names, in which account she should deposit whatever sums that he had given her for their savings. That the said Lena Richardson, instead, opened an account in the name of herself alone and fraudulently and wrongfully lead your Orator to believe that the money which he was giving her for their joint savings, was being placed in their joint bank account.
4. That from those savings in the year 1908 your Orator was able to purchase a home, 600 Crawford St., Baltimore City. That although the property was held by your Orator and the late Lena Richardson, their joint equity represented money earned and con-

tributed solely by your Orator, that in August 1924 the property was sold, the equity of your Orator and the late Lena Richardson being valued at more than fourteen hundred (\$1400) dollars, part of which money was also deposited to the credit of the aforementioned account.

5. That sometime, either in 1920 or 1922 the said Lena Richardson, deceased, fraudulently, wrongfully and without the knowledge of your Orator, changed the aforementioned account to the extent that she caused the name of Nancy Henderson (sister of the late Lena E. Richardson) to be placed on the bank book thus making the account a joint account as to Lena E. Richardson and Nancy Henderson.

6. That after your Orator had discovered the aforementioned fraud, he did not contribute any money to the late Lena Richardson to be placed in any savings account.

7. That the said Nancy Henderson is now about to withdraw the amount credited to the aforementioned account, whereby your Orator will be deprived of his right to the money which was accumulated solely as a result of his earnings and that he will be further deprived of the use of it not only for his own support but also in order that he may use it for the support and education of his five minor children unless this Honorable Court intervenes.

TO THE END, WHEREFORE YOUR ORATOR PRAYS:

I. That a restraining order be issued against the Central Savings Bank of Baltimore, a corporation, enjoining the said Central Savings Bank from paying to Nancy Henderson or any other persons, any money deposited to the credit of Lena Richardson or Lena Richardson and Nancy Henderson and that a restraining order be issued against the said Nancy Henderson, enjoining her from withdrawing any money deposited to the credit

of the account of Lena Richardson or Lena Richardson and Nancy Henderson.

2. 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 against the said Central Savings Bank and the said Nancy Henderson, commanding and requiring them 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.

*David Evans*

ATTORNEYS FOR PLAINTIFF.

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY that on this 18th day of May, in the year one thousand nine hundred and twenty six, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City aforesaid, personally appeared Robert Richardson and made oath in due form of law that the matters and facts set forth in the foregoing petition are true as therein stated.

AS WITNESS my hand and Notarial Seal.

*Walter C. Fisher*

NOTARY PUBLIC.

Ordered this 19<sup>th</sup> day of May 1926 that the Central Savings Bank be and is hereby enjoined from paying to Nancy Henderson or any other person, any money now held by the Central Savings Bank to the credit of Lena Richardson or Lena Richardson and Nancy Henderson and that Nancy Henderson is hereby enjoined from withdrawing any money deposited in the Central Savings Bank to the credit of Lena Richardson or Lena Richardson and Nancy Henderson, unless cause to the contrary be shown on or before

the 29<sup>th</sup> day of May 1926, provided a copy of this Bill and order be served on the defendants on or before May 25<sup>th</sup> 1926.

W. H. H. H.

Service of copy admitted this 27th day of May 1926

N. Ashbie Hawkins  
Att. for Nancy Henderson

236  
1926

Docket No. A-66

Ct. Ct.

ROBERT RICHARDSON

VS.

THE CENTRAL SAVINGS BANK,  
et al

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

14276  
(2)

Filed 1<sup>st</sup> June, 1926

Davis & Evans,

SOLICITORS

3-20

Summonee The Central Savings Bank, a Corporation, by service on J. H. Houck, Assistant Treasurer, and a copy of the Process left with said Assistant Treasurer, also notice of said summons left at the principal office of said Corporation. Also summons Nancy Henderson and a copy of the Process left with N. Ashbie Hawkins, the defendant's Attorney

(Moylan) 5/19/26  
(Brehler) 5/27/26

Dec 8/26

John E. Potee  
Shelf

P555

EQUITY SUBPOENA

The State of Maryland

Un

THE CENTRAL SAVINGS BANK

AND

NANCY HENDERSON

*J. H. Houch, Asst. Secy 5/19/26 1204.70  
(4)*

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

**ROBERT RICHARDSON**

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 **10th** day of **May** 192 **6**  
Issued the **19th** day of **May**, in the year 192 **6**

*Chas. P. 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.

(General Equity Rules 11)

236  
1926

66A.

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY.

ROBERT RICHARDSON

VS.

THE CENTRAL SAVINGS BANK  
and NANCY HENDERSON.

DEMURRER

Mr. Clerk;  
Please file.

*W. Ashby Hawkins*  
Solicitor for Defendant.

*W 14276*  
*L45*

HAWKINS & McMECHEN  
ATTORNEYS AT LAW  
BANNEKER BUILDING  
14 E. PLEASANT STREET  
BALTIMORE, MD.

FILED *22 May 1926*



ROBERT RICHARDSON

VS.

THE CENTRAL SAVINGS BANK  
and NANCY HENDERSON

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IN THE  
CIRCUIT COURT  
  
OF  
  
BALTIMORE CITY.

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

-First-


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

*Nancy Henderson*

*W. Ashbie Hawkins*  
Solicitor for Defendant.  
*Nancy Henderson*

State of Maryland, Baltimore City, to wit:

I hereby certify that on this *26<sup>th</sup>* day of May, in the year nineteen hundred and twenty-six, before me, the subscriber, a Notary Public of the State of Maryland, in and for Baltimore City aforesaid, personally appeared NANCY HENDERSON, the defendant in the above entitled cause, and made oath in due form of law that the demurrer filed by her therein is not intended for delay.

  
*Carlos J. J. J.*  
Notary Public.

*Norris Evans*

Ct. Ct.

236

1926

No. 66 A, Docket

Robert Richardson

vs.

Central Savings Bank  
et al

**MOTION FOR HEARING**

*a* No. *14276*  
*(5)*

Filed *4<sup>th</sup>* day of *June* 1926

*Walter Jenkins*

Robert Richardson

vs.

Central Savings Bank  
et al

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

The ~~defendant~~ <sup>Henderson</sup> Nancy ~~Richardson~~ by N. Archie Hawkins

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

for hearing on Demurrer to Bill of Complaint

June 19/56

in conformity with the First Equity Rule.

N. Archie Hawkins  
Solicitor for Nancy Henderson

Serve on 215 St Paul  
Davis & Evans

Service admitted  
June 8, 1926  
Davis & Evans.

Ct. Ct.

236  
1926 No. A-66 Docket

Richardson

vs.

Central Savings Bank, et al

**NOTICE OF HEARING**

(1)

A-No. 14276

(6)

No.

Filed 4 day of June 1926

H

Copy of the within notice served on Davis and Evans,  
Solicitors on the 8th day of June, 1926, in the  
presence of M. D. Yaffe.

John E. Potee  
Sheriff

Fee \$0.50

Robert Richardson

vs.

Central Savings Bank, et al

IN THE

**CIRCUIT COURT**

OF BALTIMORE CITY

Upon application made by the Solicitor for the

Defendant Nancy Henderson

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

Demurrer to Bill of Complaint on June 19/26

when reached in due course on said calendar.

CHARLES R. WHITEFORD

*Clerk Circuit Court.*