

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

A 237
1926

ROBERT RICHARDSON

VS.

THE PROVIDENT SAVINGS BANK
and NANCY HENDERSON

PETITION & ORDER THEREON

Mr. Clerk: -

Please file.

J. Stewart Davis
ATTORNEY FOR PLAINTIFF

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

BAUMGARTEN & CO., INC.

Service of copy admitted this 22nd day of May 1926

W. Archie Hawkskins

Sol. for Nancy F. Henderson

Copy of the within Petition and Order of Court served on The Provident Savings Bank, a Corporation, by service on William J. Steache, President, on the 19th day of May, 1926, at 1:30 o'clock, P. M., in the presence of John May Law. Also copy of the within Petition and Order of Court served on W. Archie Hawkskins, Solicitor for Nancy Henderson on the 22nd day of May, 1926 at 11:00 o'clock a. m., in the presence of Albert E. Buchler.

John E. Potter
Stenoff

Geo. P. 100

ROBERT RICHARDSON : IN THE CIRCUIT COURT

VS. : OF

THE PROVIDENT SAVINGS BANK
and NANCY HENDERSON : BALTIMORE CITY.

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 Provident 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 (\$1400.00) 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 Provident Saving Bank of Baltimore, a corporation enjoining the said Provident 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 Provident Savings Bank of Baltimore and 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.

Davis & 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.

Helen C. Fisher

NOTARY PUBLIC.

Ordered this 19th day of May 1926 that the Provident Savings Bank of Baltimore be and is hereby enjoined from paying to Nancy Henderson or any other person, any money now held by the Provident 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 Provident Savings Bank of Baltimore to the credit of Lena Richardson or Lena Richardson and Nancy Henderson, unless cause to the contrary be shown on or before the 29th day of May 1926,

provided a copy of this Bill and order be served on the defendants on or before May 25, 1926.

C. Frank

Service of copy admitted this 22nd day of May 1926

M. Arthur Henderson

Ed. for Nancy E. Henderson

P555

237
1926 Docket No. A-66 Ct. Ct.

ROBERT RICHARDSON

VS.

THE PROVIDENT SAVINGS BANK,
et al

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

*a 7 PM
14277
(2)*

Filed *1st June*, 1926

Davis & Evans,

SOLICITORS

3-20

Summoned The Provident Savings Bank, a Corporation, by
service on William J. Heache, Treasurer and a copy of
the process left with said Treasurer. Also notice of said
summons left at the principal office of said Corporation.
Also summoned Nancy Henderson and a copy of the
process left with N. Debbie Hawkins, the defendant's Attorney
(Mogler) 7/19/26 John E. Polce
(Buckler) 7/27/26 Sheriff
files 7/18

EQUITY SUBPOENA

The State of Maryland

To

THE PROVIDENT SAVINGS BANK

AND

NANCY HENDERSON

Wm J. Heacke, Treas 5/19/26 - 1:30 P.M. (41)

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 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.

(General Equity Rules 11)

237
1926

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

66A.

ROBERT RICHARDSON

VS.

THE PROVIDENT SAVINGS
BANK and NANCY HENDER-
SON.

DEMURRER

Mr. Clerk;
Please file.

W. Ashby Hawkins
Solicitor for Defendant.

*Call 277
(4)*

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

FILED

May 1926

ROBERT RICHARDDSON

VS.

THE PROVIDENT SAVINGS BANK
and NANCY HENDERSON

:
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:
:
:
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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 demurrers 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. Ashby Howard
Solicitor for Defendant.
Nancy Henderson

affidavit - 2nd page

State of Maryland, Baltimore City, to wit:

I hereby certify that on this 26th 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 Jennings
Notary Public.

A 737/1926

IN THE CIRCUIT COURT
OF BALTIMORE CITY

237
1926

ROBERT RICHARDSON

V

THE PROVIDENT SAVINGS
BANK and NANCY HENDERSON

A N S W E R

Mr. Clerk:-

Please file.

Piper, Carey & Hall

Solicitors for Provident
Savings Bank of Baltimore

214279
(5)

PIPER, CAREY & HALL
ATTORNEYS AT LAW
CALVERT BUILDING
BALTIMORE

A. J. S. May 1926

ROBERT RICHARDSON : IN THE CIRCUIT COURT

V : OF

THE PROVIDENT SAVINGS BANK
and NANCY HENDERSON : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of Provident Savings Bank of Baltimore, one of the defendants in the above entitled cause, to the bill of complaint heretofore filed against it and its co-defendant, respectfully shows unto your Honor:-

1. That it has no knowledge as to the matters alleged in the first and second paragraphs of said bill of complaint.

2. Answering the third paragraph of said bill of complaint, this defendant says that on or about the fourth day of May, 1908, one Lena E. Richardson, whose address was given as 2811 Valley Street, opened an account with this defendant at its Waverly Branch, said account being numbered 2138 and opened with a deposit of the sum of One Dollar (\$1.00). Subsequent deposits were made from time to time up to and including the eighteenth day of July, 1908, when there was to the credit of said account the sum of Twenty-four Dollars and Fifty Cents (\$24.50) and on the ninth day of September, 1908, the sum of Twenty-two Dollars and Fifty Cents (\$22.50) was withdrawn, leaving a balance to the

credit of the account of Two Dollars (\$2.00), which said sum stands to the credit of the said account at this time. Further answering the said third paragraph of the said bill of complaint, this defendant says that on or about the twenty-third day of January, 1911, one Lena E. Richardson, whose address was given as 600 Crawford Street, opened an account with this defendant at its Waverly Branch, said account being numbered 2707, by depositing the sum of Two Dollars (\$2.00), which sum was withdrawn from the said account on the eleventh day of March, 1911, and the said account closed. Further answering the said third paragraph of the said bill of complaint, this defendant says that on or about the thirteenth day of January, 1921, one Nancy T. Henderson opened a joint account with this defendant for herself and Lena E. Richardson by depositing the sum of Two Hundred and Seventy-five Dollars (\$275.00) subject to the order of either, balance at the death of either to belong to the survivor; the balance to the credit of said account now being the sum of Five Hundred Sixty-eight Dollars and Eleven Cents (\$568.11), which sum this defendant now offers to pay into Court or hold subject to a further order of this Honorable Court. Of the other matters alleged in the said third paragraph of the said bill of complaint this defendant says it has no knowledge.

3. Answering the fourth paragraph of the said bill of complaint, this defendant says it has no knowledge of the matters therein alleged.

4. Answering the fifth paragraph of said bill

of complaint, this defendant says it has no knowledge of the matters therein alleged except as set forth in the second paragraph of this answer.

5. Answering the sixth and seventh paragraphs of the said bill of complaint, this defendant says it has no knowledge of the matters therein alleged.

Having answered the said bill of complaint as fully as this defendant is advised is necessary, it prays that it may be hence dismissed with its proper costs and as in duty, etc.

Piper, Carey & Hall
Solicitors for Provident
Savings Bank of Baltimore.

PROVIDENT SAVINGS BANK OF BALTIMORE

By *Charles C. Duke*
Pres.

STATE OF MARYLAND :

CITY OF BALTIMORE : to wit :

I HEREBY CERTIFY that on this 28th 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 the City of Baltimore, aforesaid, personally appeared *Charles C. Duke* the President of the Provident Savings Bank of Baltimore, one of the defendants in the above entitled cause, and made oath in due form of law that the matters and things set forth in the said answer are true to the best of his knowledge, information and belief.

WITNESS my hand and notarial seal the day and

year last above written.

Otto V. Jursik
Notary Public.

Upon the foregoing answer and affidavit it is ordered this _____ day of _____, nineteen hundred and twenty-six, by the said Court of Baltimore City that Provident Savings Bank of Baltimore hold the sum of Five Hundred Eighty-six Dollars and Eleven Cents (\$586.11) mentioned in said answer, subject to the further order of this Court.

Davis Evans

Ct. Ct.

237
1926

No. 66 A; Docket

Robert Richardson

vs.

Provident Savings Bank
et al

MOTION FOR HEARING

a No. 14877
26

Washburn Perkins

Filed Hth day of June 1926

Robert Richardson

vs.

Provident Savings Bank
et al

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The defendant Nancy Henderson by W. Hobie Hawkins

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

for hearing on Demurrer to Bill of Complaint.

June 19/26

in conformity with the First Equity Rule.

W. Hobie Hawkins
Solicitor for defendant, Nancy Henderson

Serve on 215 to Paul

Davis & Evans

Service admitted
June 8, 1926
Davis & Evans.

Ct. Ct.

237
1926 No. A-66 Docket

Richardson

vs.

Provident Savings Bank,
et al

NOTICE OF HEARING

(1)

A-No. 14277

(7)

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 Mr. L. Yaffe. John E. Potter
New York, N.Y. Sheriff

Robert Richardson

VS

Provident 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.

437 } 937
in the
Circuit Court
of
Baltimore City

Robert Richardson

to

The Provident Savings
Bank et al

Order of Court.

214277
(8)

Pt. 19 June 1932

Robert Richardson

In the

vs

Circuit Court

of

The Provident Savings Bank } Baltimore City,
and Nancy Henderson

This cause coming on to be heard on Demur-
rer to the Bill of Complaint, and being heard,
it is Ordered by the Court this 19th day of
June 1926 that the Demurrer be sustained
with leave to the complainant to file
an amended Petition within fifteen
days.

C. H. [Signature]

Sume on
Provident Sngs
Bank
and
W. A. Hawken
Sgt for Nancy
Henderson

Ashbie W. Hawkins
14 1/2 Pleasant St
7/7/26

IN THE CIRCUIT COURT OF

BALTIMORE CITY

ROBERT RICHARDSON

VS.

THE PROVIDENT SAVINGS
BANK OF BALTIMORE and
NANCY HENDERSON

PETITION & ORDER THEREON

Mr. Clerk:-

Please file.

David Evans
ATTORNEYS FOR PETITIONER

Pl. 6 July 1926
3-9

214277
(9) (11)

Copy of the within Petition and Order of Court served on
The Provident Savings Bank of Baltimore, a Corporation, by service
on William J. Heathke, Treasurer on the 5th day of July, 1926,
in the presence of Harry W. Riley. Also copy of the within
Petition and Order of Court served on W. Bebbell Hawkins,
Solicitor for Nancy Henderson on the 7th day of July, 1926,
in the presence of Adam S. Buck.

John E. Potee
Clerk

Fees \$1.00

ROBERT RICHARDSON

:

IN THE CIRCUIT COURT

VS.

:

OF

THE PROVIDENT SAVINGS
BANK OF BALTIMORE and
NANCY HENDERSON

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:-

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, Waddell, age seventeen, Robert, age sixteen, Ella, age fourteen, Jessie, age eight and Edward, age five years, 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 Provident 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 contributed 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 Lena Richardson) to be placed on the bank book, thus making the account a joint account as to Lena Richardson and Nancy Henderson. That the said Nancy Henderson aided and connived with the said Lena Richardson, deceased, in fraudulently and wrongfully changing the bank book to the joint names of Nancy Henderson and Lena Richardson.

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 for the support and education of his five minor children unless this Honorable Court intervenes.

8. That your Orator further alleges that the said Nancy Henderson gave no consideration of value whatsoever for the interest she received as a result of the fraudulent transfer of the bank account to the joint credit of Lena Richardson and Nancy Henderson.

TO THE END, WHEREFORE, YOUR ORATOR PRAYS:

I. That a restraining order be issued against the Provident Savings Bank of Baltimore, a corporation, enjoining the said Provident Savings Bank from paying to Nancy Henderson or any other person 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. That the said Nancy Henderson and the Provident Savings Bank of Baltimore be ordered to deliver to Robert Richardson as Administrator of the said Lena Richardson, the money now deposited in the aforementioned bank in the joint names of Nancy Henderson and Lena Richardson.

3. 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 The Provident Savings Bank of Baltimore and 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.

Davis & Evans.

ATTORNEYS FOR PLAINTIFF.

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this 3rd day of July, 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.

Wilem C. Fisher
NOTARY PUBLIC.

Ordered this 6th day of July 1926 that The Provident Savings Bank of Baltimore be and is hereby enjoined from paying to Nancy Henderson or any other person, any money now held by The Provident 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 Provident Savings Bank of Baltimore to the credit of Lena Richardson or Lena Richardson and Nancy Henderson, unless cause to the contrary be shown on or before the 16th day of July 1926,

provided a copy of this file and order be served on the defendants on or before the 10th day of July 1926.

H. Arthur Stump.

P 617

Ct. Ct.

237

192 6

Docket No. A-66

Robert Richardson

vs.

The Provident Savings Bank
of Baltimore et al

^{Amended}
SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

14277
210

Filed 10th July, 192.6.

Davis & Evans,

SOLICITORS

B-9

Summoned The Provident Savings Bank of Baltimore, a Corporation, by service on William J. Haacke, Treasurer and a copy of the Process left with said Treasurer. Also notice of said summons left at the principal office of said Corporation. Also summoned Nancy Henderson and a copy of the Process left with Mr. Archie Hawkins, the defendant's attorney.

(Buck) 7/7/26
(Riley) 7/8/26

Yes \$/20

John E. Potee Sheriff

EQUITY SUBPOENA

The State of Maryland

To

The Provident Savings Bank of
Baltimore,

and

Nancy Henderson

Ashbie W. Hawkins Attor

7/7/26(3)

7/8/26 (9)

Wm. J. Staacke
Treas.

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 July next cause an appearance to be entered for you and your answer to be filed to the amended 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 1926.
Issued the 6th day of July, 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.

(General Equity Rules 11)

237
1926

In the
Circuit Court
of
Baltimore City.

66 A.

Robert Richardson

vs.

The Provident Savings Bank
Of Baltimore and
Nancy Henderson.

Answer.

Mr. Clerk;
Please file.

W. Ashbie Hawkins
Solicitor for Respondent.

*W 14277
L 12)*

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

FILED

10 July 1926

THE DAILY RECORD COMPANY
Baltimore, Md.

ROBERT RICHARDSON

vs.

THE PROVIDENT SAVINGS BANK
OF BALTIMORE and
NANCY HENDERSON

IN THE
CIRCUIT COURT

OF

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Answer of the Defendant, Nancy Henderson, to the Bill of Complaint against her and others exhibited in this Honorable Court, respectfully represents:

-First-

Your respondent admits the marriage of the complainant with her sister, the late Lena Ruchardson, the death of the latter at the time alleged, and that she left surviving her the children mentioned in paragraph No. 1 of said Bill of Complaint.

-Second-

Your respondent having no exact knowledge of the business affairs of the complainant, Robert Richardson, neither admits nor denies the allegations in Paragraph No. 2 of said Bill of Complaint, but she puts complainant to the strict proof thereof.

-Third-

That your respondent neither admits nor denies any of the allegations set out in Paragraph No. 3 of said Bill of Complaint, but she puts complainant to the strict proof thereof.

-Fourth-

That your respondent had no knowledge of the complainant's business affairs in connection with his property interests, his wages or salaries earned, or in what manner or when expended, what equities he or his late wife possessed, and because of her ignorance of such, she neither admits or denies any of the allegations in Paragraph No. 4 of said Bill of Complaint, except that she denies fully and completely that any money belonging to the said complainant, Robert Richardson, was ever deposited by

his late wife or anybody else to any account in which your respondent is now or ever has been interested, as to all other allegations in said paragraph she puts complainant to the strict proof thereof.

-Fifth-

That your respondent answering paragraph No. 5 of said Bill of Complaint denies **fully** and completely that her sister, the late Lena Richardson, wife of the complainant, ever caused any bank book belonging to the complainant, to be changed as alleged, or that she caused any funds in which the complainant was interested to be charged with any such burdens as herein indicated, and she denies fully and completely that the respondent ever in any manner, at any time, or place aided and connived with her sister aforesaid, or with anybody else to bring about such situation as the complainant alleges in said paragraph with regard to any funds of his or anyone else.

-Sixth-

That your respondent neither admits **nor denies** the allegations in Paragraph No. 6 of said Bill of Complaint, but she puts complainant to a strict proof thereof.

-Seventh-

That your respondent denies that it is her purpose to withdraw the funds on deposit in the Provident Savings Bank of Baltimore, but she avers that if such was her intention, she would be withdrawing what is absolutely the property of the respondent, the result of her won labors and what came to her from the estate of her late husband, Walter Henderson.

Further answering said paragraph your respondent denies that a single penny of this fund was accumulated by the complainant, or his deceased wife, and she avers and charges that all of this is well known to the complainant.

-Eighth-

That your respondent in answer to the 8th Paragraph of said Bill of Complaint denies its allegations, and alleges that the funds of money on deposit as aforesaid is the result of her own efforts and that of her late husband, Walter Henderson, that her late sister, Lena Richardson, wife of the complainant aforesaid, had nothing whatever to do with said fund, or its deposit, not even to the extent of having her name placed thereon.

Having answered said Bill of Complaint as fully as she is advised is necessary or **proper your** respondent asks that she be hence dismissed with her bill of costs.

And as in duty bound. etc.,

Nancy T. Henderson
Respondent.

W. Archie Hawkins
Solicitor for Respondent.

State of Maryland, Baltimore City, to wit:

I hereby certify, that on this 9th day of July, 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 Baltimore City aforesaid, personally appeared **Nancy** Henderson, Respondent, and made oath in due form of law that the foregoing matter is true to the best of her knowledge and belief.

Carlos C. Jennings
Notary Public.

Davis T Evans

Ct. Ct.

237
1926

No. 66 A, Docket

Robert Richardson

vs.

The Provident Savings

Bank et al.

MOTION FOR HEARING

a No. 14297
(13)

Piper, Cary & Hall
Washington

Filed 16th day of July 1926

Robert Richardson

vs.

The Provident Savings Bank

Nancy Richardson

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The defd. Nancy Richardson by W. Robbie Hawkins

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

for hearing on Bill & Answer

Tuesday July 30/26

in conformity with the First Equity Rule.

W. Robbie Hawkins
Solicitor for defendant, Nancy Richardson

Serve on
Davis & Evans

215th Paul

Ct. Ct.

237
1926 No. A-66 Docket

Richardson

vs.

The Provident Savings Bank
et al

NOTICE OF HEARING

A-No. 14277

(14)

No.

Filed 16 day of July 1926.

H

Copy of the within Notice served on Davis and Evans,
Solicitors on the 17th day of July, 1926, in the
presence of Frank A. Budacy. John E. Polce
Dees J.C. So Sheriff

Robert Richardson

vs.

The Provident Savings Bank
et al

IN THE

CIRCUIT COURT

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

Bill & Answer on Tuesday July 20/26.

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

IN THE
CIRCUIT COURT OF BALTIMORE
CITY

237
20/9/22
ROBERT RICHARDSON

V

PROVIDENT SAVINGS
BANK OF BALTIMORE
and NANCY HENDERSON

ANSWER TO AMENDED BILL OF
COMPLAINT

Mr. Clerk:

Please file.

Piper, Carey & Hall
Solicitors for Provident
Savings Bank of Baltimore

214777
215
PIPER, CAREY & HALL
ATTORNEYS AT LAW
CALVERT BUILDING
BALTIMORE

At. 16" July 1922

ROBERT RICHARDSON	:	IN THE CIRCUIT COURT
	:	
	:	
V	:	OF
	:	
	:	
PROVIDENT SAVINGS BANK OF	:	
BALTIMORE and NANCY	:	BALTIMORE CITY.
HENDERSON	:	

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of Provident Savings Bank of Baltimore, one of the defendants in the above entitled cause, to the amended bill of complaint heretofore filed against it and its co-defendant, respectfully shows unto your Honor:-

1. That it has no knowledge as to the matters alleged in the first and second paragraphs of said bill of complaint.

2. Answering the third paragraph of said bill of complaint, this defendant says that on or about the fourth day of May, 1908, one Lena E. Richardson, whose address was given as 2811 Valley Street, opened an account with this defendant at its Waverly Branch, said account being numbered 2138 and opened with a deposit of the sum of One Dollar (\$1.00). Subsequent deposits were made from time to time up to and including the eighteenth day of July, 1908, when there was to the credit of said account the sum of Twenty-four Dollars and Fifty Cents (\$24.50) and on the ninth day of September, 1908, the sum of Twenty-two Dollars and Fifty Cents (\$22.50) was withdrawn, leaving a balance to the

credit of the account of Two Dollars (\$2.00), which said sum stands to the credit of the said account at this time. Further answering the said third paragraph of the said amended bill of complaint, this defendant says that on or about the twenty-third day of January, 1911, one Lena E. Richardson, whose address was given as 600 Crawford Street, opened an account with this defendant at its Waverly Branch, said account being numbered 2707, by depositing the sum of Two Dollars (\$2.00), which sum was withdrawn from the said account on the eleventh day of March, 1911, and the said account closed. Further answering the said third paragraph of the said amended bill of complaint, this defendant says that on or about the thirteenth day of January, 1921, one Nancy T. Henderson opened a joint account with this defendant for herself and Lena E. Richardson by depositing the sum of Two Hundred and Seventy-five Dollars (\$275.00) subject to the order of either, balance at the death of either to belong to the survivor; the balance to the credit of said account now being the sum of Five Hundred Sixty-eight Dollars and Eleven Cents (\$568.11), which sum this defendant now offers to pay into Court or hold subject to a further order of this Honorable Court. Of the other matters alleged in the said third paragraph of the said amended bill of complaint this defendant says it has no knowledge.

3. Answering the fourth paragraph of the said amended bill of complaint, this defendant says it has no knowledge of the matters therein alleged.

4. Answering the fifth paragraph of said amended bill of complaint, this defendant says it has no knowledge

of the matters therein alleged except as set forth in the second paragraph of this answer.

5. Answering the sixth and seventh paragraphs of the said bill of complaint, this defendant says it has no knowledge of the matters therein alleged.

6. Answering the eighth paragraph of said amended bill of complaint, this defendant says it has no knowledge of the matters therein alleged.

Having answered the said amended bill of complaint as fully as this defendant is advised is necessary, it prays that it may be hence dismissed with its proper costs and as in duty, etc.

Piper, Cary & Hall
Solicitors for Provident
Savings Bank of Baltimore.

PROVIDENT SAVINGS BANK OF BALTIMORE

By

Charles C. Mule
Pres.

STATE OF MARYLAND :

CITY OF BALTIMORE : to wit :

I HEREBY CERTIFY that on this *16th* day of July 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 *Charles C. Mule* the — President of the Provident Savings Bank of Baltimore, one of the defendants in the above entitled cause, and made oath in due form of law

that the matters and things set forth in the said answer are true to the best of his knowledge, information and belief.

WITNESS my hand and notarial seal the day and year last above written.

Conrad J. McKenzie
Notary Public.

Upon the foregoing answer and affidavit it is ordered this day of nineteen hundred and twenty-six, by the said Court of Baltimore City that Provident Savings Bank of Baltimore hold the sum of Five Hundred Eighty-six Dollars and Eleven Cents (\$586.11) mentioned in said answer, subject to the further order of this Court.

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In the
Circuit Court No. 2
of
Baltimore City.

219
Robert Richardson,

vs.

The Provident Savings Bank
of Baltimore and
Nancy Henderson.

Decree.

214277
116

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

FILED

July 1926

THE DAILY RECORD COMPANY
Baltimore, Md.

Robert Richardson

vs.

The Provident Savings Bank
of Baltimore and
Nancy Henderson

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In the

Circuit Court ~~No. 2~~

of

Baltimore City.

The defendants having filed their separate Answers to the Bill of Complaint in this cause, and the same standing ready for a hearing thereon, and having been submitted, the counsel for the parties were heard and the proceedings read and considered. *4 testimony having been taken in open court*

It is thereupon, this *28* day of July 1926 by the Circuit Court ~~No. 2~~ of Baltimore City, Adjudged, ~~Ordered and Decreed that the Bill of Complaint be and the same is hereby dismissed, that~~ the fund of money on deposit in the Provident Savings Bank of Baltimore City in the joint names of Lena Richardson and Nancy Henderson, the former having died, ~~is~~ *is* the property of the survivor, Nancy Henderson.

It is further adjudged, ordered and decreed that the plaintiff pay the cost of these proceedings. *and the Bill be and is hereby dismissed,*

Wm. G. Dunne