

CIRCUIT COURT OF
BALTIMORE CITY

685
1976

PERKINS SQUARE BAPTIST
CHURCH OF BALTIMORE CITY,
et al

VS.

REV. SIDNEY EDWARDS, et al

PETITION & ORDER THEREON.

Mr. Clerk:-

Please file.

ATTORNEYS FOR PLAINTIFF

214678
2024

DAVIS & EVANS
ATTORNEYS AT LAW

[Handwritten signature]
1976

THE PERKINS SQUARE BAPTIST
CHURCH OF BALTIMORE CITY,
DAVID MORREL,
JAMES JOHNSON,
R.D.WILSON,
GEORGE W. JOHNSON,
WILLIAM JEFFERSON,
JOHN FRANCIS,
JAMES H. COOPER,
PARKER STRATTON,
WILLIAM POLLARD and
HARRY S. JOHNSON

: IN THE CIRCUIT COURT

:

VS.

:

OF

REV. SIDNEY EDWARDS and
REV. F. R. WILLIAMS

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orators, David Morrel, James Johnson, R. D. Wilson, George W. Johnson, William Jefferson and John Francis represent the majority of the Board of Deacons, regularly elected to serve as such in the Perkins Square Baptist Church, and that James Cooper, Parker Stratton, . . . William Pollard and Harry S. Johnson represent a majority of the Board of Trustees regularly elected to serve at Perkins Square Baptist Church, and on behalf of the majority of the regular communicant members, over the age of twenty-one years, they respectfully say:-

1. That on or about the 10th day of August 1881, the Perkins Square Baptist Church of Baltimore was incorporated in accordance with the laws of the State of Maryland; that at the time of the incorporation of the aforementioned Perkins Square Baptist Church of Baltimore, Rev. F. R. Williams was one of the incorporators and the duly elected minister of the aforementioned Church.

2. That the Rev. F. R. Williams continued to function as the minister of the aforementioned Church until about fourteen months prior to the filing of this bill of complaint, the said Rev. F. R. Williams became so incapacitated physically and mentally

that he was unable to perform his pastoral duties; that after it became evident that the Rev. F. R. Williams would never recover mentally or physically so that he could properly resume his pastoral duties; pursuant to the provisions for the selection of the pastor as contained in the original articles of incorporation in the year 1926, the members of the aforementioned Perkins Square Baptist Church of Baltimore, appointed a committee, which committee should recommend to the Church body a pastor for the aforementioned Church. That from time to time the aforementioned Committee invited several ministers to preach at the Perkins Square Baptist Church in order that the congregation might have an opportunity to pass on their qualifications; that while the aforementioned committee was considering the selection of a successor for the aforementioned Rev. F. R. Williams, the said Rev. F. R. Williams, without consulting the committee or the church body, designated the Rev. Sidney Edwards as his successor or substitute on or about the 15 day of Aug. 1926; that the said Rev. Sidney Edwards has been functioning as the pastor of the said Perkins Square Baptist Church since the said designation by the Rev. F. R. Williams.

3. That on or about the 13 day of October, 1926, at a business meeting of the aforementioned Perkins Square Baptist Church, of which meeting the voting members of the Church had proper notice in accordance with the provisions of the articles of incorporation, the Rev. F. R. Williams was elected Pastor Emeritus and the pulpit was declared vacant; that the Rev. Sidney Edwards was notified in writing of the decision of the aforementioned meeting and was asked not to conduct the services on the Sunday following said notice; that the Rev. Sidney Edwards refused to heed the request to discontinue conducting the services in the aforementioned Perkins Square Baptist Church and a committee notified the Rev. Sidney Edwards in person that it had been regularly decided that the pulpit was vacant and that he should no longer perform the services as minister of said church; that the Rev.

Sidney Edwards ignored the request of the committee also and continued to fill the pulpit.

4. That on or about Nov. 28, 1926, after the Rev. Sidney Edwards had been notified of the decision in reference to the vacancy of the pulpit, the Rev. Sidney Edwards came to the Perkins Square Baptist Church of Baltimore surrounded by several persons and entered the church; that the Rev. Sidney Edwards proceeded to the pulpit; that upon one of the members of the Board of Deacons arising, the persons, who accompanied the Rev. Sidney Edwards and the Rev. Sidney Edwards himself became loudly abusive, issued threats of violence against any who objected to the presence of Rev. Sidney Edwards; and that they did inflict violence upon one member of the Board of Deacons, thus destroying the sacredness of any religious service attempted.

5. That on or about November 14, 1926, the said Rev. Sidney Edwards attended a meeting of the Baptist Young Peoples' Union of the Perkins Square Baptist Church of Baltimore and without the least provocation, caused a disturbance of the meeting, making any further attempt to continue useless.

6. That at the regular monthly business meetings of the Church, held pursuant to the provisions of the Articles of Incorporation, the said Rev. Sidney Edwards insists upon presiding, though he has never been authorized to do so in the manner and form as described in the Articles of Incorporation; that further the Rev. Sidney Edwards refuses to permit the members of the Church to vote on the legal motions made or resolutions offered; whereby the plan of agreement as set out in the Articles of Incorporation ^{is violated}; a copy of which Articles of Incorporation, is filed herewith as part hereof to be known as "Exhibit A".

7. That the Rev. Sidney Edwards is subject to sharp practices and is grossly incompetent to properly guide the spiritual fortunes of the congregation or to attend the temporal affairs of the church; that unless this Honorable Court intervenes

the congregation of the aforementioned Church will become disturbed and eventually will sever their connection with the aforementioned church; that the temporal affairs and the business transactions of the church will be such that the church will be unable to meet its obligations; that the said members, Board of Deacons and Trustees of said church have no adequate remedy at law.

WHEREFORE YOUR ORATORS PRAY:

(a) That the said Rev. Sidney Edwards, his agents and servants they and each of them, may be enjoined from acting or attempting to act as Pastor of Perkins Square Baptist Church of Baltimore and from exercising or attempting to exercise any of the rights and duties as Pastor of said Church.

(b) That the said Rev. F.R. Williams, his agents and servants, they and each of them, may be enjoined from acting or attempting to act as Pastor of Perkins Square Baptist Church of Baltimore and from exercising or attempting to exercise any of the rights and duties as Pastor of said Church, except in so far as the said Rev. F.E. Williams is permitted to act under his appointment as Pastor Emeritus

(c) Such other and further relief as the case may require.

May it please your Honor to grant unto your Orators the Writ of Subpoena directed against the said Rev. Sidney Edwards and Rev. F.E. Williams, 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 PLAINTIFFS

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this ^{2nd} day of December, 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 David Morrel, James Johnson, R.D. Wilson, ~~George W. Johnson~~, ~~William Jefferson~~, John Francis, James H. Cooper, Parker Stratton, William Pollard and Harry S. Johnson and made oath in due form of law that the matters and facts in the foregoing petition are true to the best of their knowledge and belief.

AS WITNESS my hand and Notarial Seal.

Helen C. Fisher

NOTARY PUBLIC.

On the foregoing Bill, exhibit and affidavit, it is this 3rd day of *December* 1926, by the Circuit Court of Baltimore City, ordered that a Writ of Injunction be issued as prayed in said bill, upon the filing of a bond by the said plaintiff in the penalty of \$7000⁰⁰ with security to be approved by the Clerk of this Court, but liberty is hereby reserved to the defendants to move for the rescinding of this order and for a dissolution of the injunction to be issued as aforesaid at any time after filing their answer to said bill or giving the plaintiff five days previous notice of such motion. And the Clerk is hereby directed to annex a copy of this order to the writ of injunction.

C. Frank

Plaintiff's Exhibit A.
Perkins Square Baptist Church
of Balto. et al

Sidney Edwards

SUPERIOR COURT

of BALTIMORE CITY

685
1926

ROOM 310

STEPHEN C. LITTLE

Clerk

COPY

Charter

~~FROM~~

The Perkins Square Baptist
Church of Baltimore City

TO
A/H 678
L2

Liber. F A P No. 21 Fol. 475

Amount \$4.25 Exd. *RCM*

Paid

J. B. December 1926

The Perkins Square Baptist Church)
of)
Baltimore City)

TO ALL WHOM MAY CONCERN
Know ye that all the members
over twenty one years of age
of the Colored Baptist

Congregation accustomed to worship on the southeast corner of George and Ogston Streets being desirous to elect certain of their members to be constituted a body politic or corporate under and in pursuance of the Code of Public General Laws of Maryland Article twenty six Section one hundred and fifty six and following did assemble together on the thirteenth day of July eighteen hundred and eighty one at their accustomed place of Worship agreeably to public notice given on preceding Sunday and did duly elect the following five Sober and discreet persons Jordan Christian Lewis Ruffings Arnold D Mines Henry Wake and Charles H Carter trustees together with the Minister for the time being having the pastoral charges to be constituted a body politic or corporate by the name and style and title of the Perkins Square Baptist Church of Baltimore City and to have and enjoy all of the rights powers and immunities in such cases and provided by the Laws of this State and the same members did then and their determine upon a plan or agreement the following portions of which do specify the time and manner of electing trustees the manner in which the succession shall be perpetuated and all the matters required by law to be contained therein as follows SECTION 1 ARTICLE 3 In the election of a Pastor other officers or Trustees of the Church it shall be the duty of the officers to cause public notice of the time place and purpose thereof to given from the pulpit on each of the two Sabbaths next preceding the election ARTICLE 4 The election of Pastor and other officers as well as all business pertaining to and promotive of the interests of the Church shall be vested in and exercised by the Male Members of twenty one years of age and upwards and where unanimity cannot be obtained a majority of those present entitled to vote shall determine all questions that may arise except in cases otherwise specially provided for The restriction as to age however shall apply to the constituent members of the Church ARTICLE 5 The Church shall meet for the transaction of business on the fourth Wednesday evening of each month ARTICLE 7 Five members of the Church shall be elected on the fourth Wednesday Evening in June of each year or as soon thereafter as may be convenient who shall

form the body politic or corporate by the name style and title of the Perkins Square Baptist Church of Baltimore and who shall hold in trust all property effects &c for the benefit of the Church The Acts of the Trustees to be valid only when ratified by a vote of two thirds of the members present entitled to vote at a regular convened meeting of the Church any any vacancy that may occur previous to the annual election shall be filled by the remaining members of the Trustees

The Trustees shall continue in office until others are elected

SECTION V Article 1 This form of Church Government may be altered or amended by a vote of two thirds of the members thereof present at any regular quarterly business meeting provided that notice of such alteration or amendment shall have been given at a previous quarterly meeting

IN TESTIMONY WHEREOF the Pastor of the said Church and a majority of the said Trustees have hereto set their hands and affixed their seals

	Jordan Christian	(Seal)
Test	Lewis Ruffing	(Seal)
Geo A Hemmick	Arnold D Mines	(Seal)
E B Graff	W Henry Wake	(Seal)
	Francis R Williams	(Seal)

STATE OF MARYLAND CITY OF BALTIMORE TO WIT

We hereby certify that on this first day of August in the year one thousand eight hundred and eighty one before the subscribers two Justices of the Peace of the State of Maryland in and for the City of Baltimore aforesaid personally appeared Jordan Christian Lewis Ruffings Arnold D Mines Henry Wake and Francis R Williams a majority of the foregoing duly elected trustees and acknowledged the foregoing to be their deed and act for the purposes and intent therein declared

E Beatty Graff J P

Geo A Hemmick J P

Received for record Aug 10th 1881 at 9 $\frac{1}{4}$ o'clk same day recd & Exd

per F A Prevost Clerk

I HEREBY CERTIFY that the foregoing is a true copy taken from Liber F A P
No 21 folio 475 &c one of the Charter Records of Baltimore City



IN TESTIMONY WHEREOF I hereto
set my hand and affix the
Seal of the Superior Court of
Baltimore City on this the 2nd
day of December A D 1926

Stephen L. Little

Clerk of the Superior Court
of Baltimore City

P 818

Ct. Ct.

685

1926 Docket No. A-66

Perkins Square Baptist Church &c, et al

vs.

Rev. Sidney Edwards, et al
753 *George St*

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

APW
14678
(3)

Filed *9th Dec*, 1926.

Davis & Evans,
SOLICITOR S

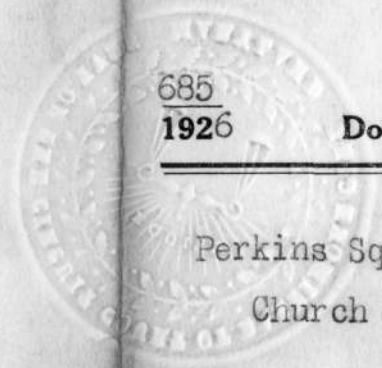
10-11

*Summoned Ambo and a copy of Process left
with each Defendant*

By
Buchey

John E. Potes
Sheriff

Dec 11/26



The State of Maryland
EQUITY SUBPOENA

REMEMBRANDUM: You are required to the same extent as other persons in the County of Baltimore to appear in the Court House, Baltimore City, at the time and place specified in the Subpoena to answer the Bill of Complaint in the case of Perkins Square Baptist Church &c, et al vs. Rev. Sidney Edwards, et al, Docket No. A-66, 1926.

EQUITY SUBPOENA

The State of Maryland

In

Rev. Sidney Edwards and *OP 12/7/26* (10)

Rev. F. E. Williams *OP 12/3/26* (10)

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

The Perkins Square Baptist Church &c et al.

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 8th day of November 192 6
 Issued the 3rd day of December, 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.

Ct. Ct.

685 A
191

No.

Docket.

The Parkers Square Baptist Church vs. et al,

Rev. Sidney Edwards

Injunction Bond.

A No. 14678
(5)

BOND APPROVED:

Chuck R. Whiteford
Clerk.

Filed 3rd December 1910

Know all Men By these Presents,

That we,

The Perkins Square Baptist Church of Balto, as principal
Robert Wilson, James Johnson as sureties

of the City of Baltimore, and State of Maryland, are held and firmly bound unto the State of Maryland, in the full and just sum of One Thousand

Dollars, current money, to be paid to the said State of Maryland or its certain Attorney; to which payment well and truly to be made and done, we bind ourselves, and each of us, our and each of our Heirs, Executors and Administrators, jointly and severally, firmly by these presents. Sealed with our seals, and dated this 3rd day of December in the year of our Lord one thousand nine hundred and 26.

Whereas, by an order of the Circuit Court of Baltimore City, passed in a cause wherein the said Perkins Square Baptist Church of Balto et al

Complainant, and Rev. Sidney Edwards and F. R. Williams

the Defendant an injunction is about to issue to restrain the said defendant as prayed in the bill in said cause exhibited, upon the complainant filing a bond with security in the above penalty.

Now the Condition of the above Obligation is such, That if the said complainant shall do and prosecute the said writ of injunction with effect, and satisfy and save harmless the said defendant if the same be not prosecuted with effect, and in such cases pay all costs and damages that may be occasioned by the issuing thereof, and shall in all things obey, abide by, perform and fulfill such decree and order as shall be made in the premises, then the above obligations to be void, otherwise of full force and virtue.

Signed, sealed and delivered in the presence of

Heleen C. Fisher

The Perkins Square Baptist Church of Balto et al [SEAL]
by Stewart Davis - acty [SEAL]
Robert Wilson [SEAL]
James Johnson [SEAL]

State of Maryland, Baltimore City, Oct.

I hereby certify, that on this 3rd day of Dec., 1926

personally appeared before me, the subscriber, a Notary Public Justice of the Peace of said State, in and for said City, Robert A. Wilson and James L. Johnson and made oath on the Holy Evangely of Almighty God, that he knows the pecuniary circumstances of the within named sureties, and that they are worth the amount of the penalty set forth in the within bond, over and above their just debts and liabilities.

Heleen C. Fisher
Notary Public

1818

Circuit Court.

685
1926 No. A-66 Docket.

The Perkins Square Baptist
Church &c., et al

vs.

Rev. Sidney Edwards et al

INJUNCTION.

2 Injunct + 7 Orders
June 4⁵⁵
12/3/26

R. No. 14678

(6)

Filed 3rd December 1926.

10-11

Injunction and copy and copy of Order of Court
Served on Ft. 19 Williams on the 3rd day of December
1926 at 4⁵⁵ Pm also Injunction and copy and copy
of Order of Court Served on Sidney Edwards on the
7th day of December 1926 at 1¹⁵ Pm in Presence of
August 18 Dickey

John E. Potes
Sheriff

Dec 15th

with the further order of said Court in the premises.
Witness the Honorable Chief Justice of the Supreme Bench of
Baltimore City, the day of 1926
I gave the

[Faint signature]

The State of Maryland, June 15 PM

To Sidney Edwards OP 12/7/26 10

F. R. Williams OP 12/3/26 10

June 455 PM

Greeting:

Whereas, The Perkins Square Baptist Church &c, et al have exhibited to us in our CIRCUIT COURT OF BALTIMORE CITY their Bill of Complaint for relief in Equity, and for AN INJUNCTION to restrain you the said Sidney Edwards and your agents & servants from acting or attempting to act as Pastor of Perkins Square Baptist Church of Baltimore, or from exercising or attempting to exercise any of the rights and duties as pastor of said Church and you the said F. R. Williams, your agents and servants from acting or attempting to act as Pastor of Perkins Square Baptist Church of Baltimore and from exercising or attempting to exercise any of the rights and duties as Pastor of said Church, except in so far as the same are permitted under your appointment as Pastor Emeritus,

until the matter can be heard and determined in equity.

Now, Therefore, these are to COMMAND and strictly to ENJOIN and PROHIBIT you, the said Sidney Edwards and F. R. Williams, your agents and servants from doing the things above recited

until the further order of our said Court in the premises.

Witness the Honorable JAMES P. GORTER MORRIS AX SOPER, Chief Judge of the Supreme Bench of

Baltimore City, the 8th day of November 1926

ISSUED the 3rd day of December 1926.

Chas. R. Whiteford Clerk.

IN THE CIRCUIT COURT OF
BALTIMORE CITY

685
a 1936

PERKINS SQUARE BAPTIST
CHURCH OF BALTIMORE CITY,
et al

VS.

REV. SIDNEY EDWARDS, et al

A N S W E R

Mr. Clerk:-

Please file.

Harry O. Levin
Sol. for Respondants

a 14678

27)

HARRY O. LEVIN
ATTORNEY AT LAW
BALTIMORE

Plt. H. O. December 1936

PERKINS SQUARE BAPTIST
CHURCH OF BALTIMORE CITY,
et al

VS.

REV. SIDNEY EDWARDS, et al

IN THE CIRCUIT COURT

OF

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Respondents, Frank R. Williams and Sidney Edwards, saving and reserving any and all objections which might be interposed by demurrer, answering the preamble to said bill of complaint, deny that David Morrell, James Johnson, R. D. Wilson, George W. Johnson, William Jefferson and John Francis, represent or constitute the majority of the Board of Deacons of the Perkins Square Baptist Church, and further deny that James Cooper, Parker Stratton, William Pellard, and Harry S. Johnson, represent or constitute a majority of the Board of Trustees of said Church, and explanatory of said denial, Respondants aver that the Board of Deacons of said Church is comprised of twenty-three persons, nine men and fifteen women, by virtue of a resolution duly passed on January 29, 1923; and that the Board of Trustees of said Church is composed of eight persons and but that four thereof have joined in this action as parties plaintiff.

1.

Your Respondants for answer to the first paragraph, admit the allegations thereof, your Respondant Williams, being a charter member of the Church, incorporated in 1881 and active in all its affairs until he was stricken with illness about a year ago.

2.

Answering the second paragraph, Respondants admit that Respondant Williams about a year ago became physically

2.

unable to function as Pastor, but denies any mental infirmity or impediment; that on the contrary, while feeble in body, he is fully equipped mentally; Respondants further deny that a committee to recommend a Pastor in his place was ever appointed or legally considered by the Church body; that Respondant Williams in the complete possession of his mental ~~facilities~~ ^{faculties} and exercising the prerogatives of his office which he has ~~honoring~~ ^{honorably} and diligently filled for forty-eight years, ^{upon} ~~becoming~~ physically incapacitated and unable thereby to carry on his duties, designated as Acting Pastor, Respondant Edwards, and that said Edwards has during the course of his ministry officiated with credit and dignity, to the benefit of the Church, ~~and~~ ^{and} its members ^{and} to the glory of God.

3.

Answering the third paragraph, Respondants admit that ~~a~~ a regular meeting of the Church was held on October 13, 1926, but deny that the pulpit was declared vacant at said Meeting or that Respondant Williams was elected as Pastor Emeritus. That at said meeting, at which Respondant Edwards presided ^{as} acting ~~as~~ Pastor, in the exercise of his appointment by Respondant Williams, a resolution was presented by the Complainants, the purpose of which was to declare the Pulpit vacant and elect Respondant Williams as Pastor Emeritus, but that Respondant Edwards officiating as chairman of the meeting, refused to put said resolution to vote, because the provisions of the Charter of the Church and subsequent resolutions amending the same, regularly adopted, with respect to the election of Pastor and other officers, were not complied with, in that said Charter ~~and regulations~~ requires public notice of the ~~time~~ ^{time}, place, and purpose of meetings for election of Pastor to be given from the Pulpit, on each of the two Sabbaths preceeding the election, and that said notice as required by the laws of

3.

of the Church was not given. That when Respondant Edwards declined to allow said resolutions to be voted on, the Complainants caused a police officer to be called for the purpose of intimidating him; that after a heated discussion and debate, in order to restore amity and good will, Respondant Edwards suggested that the dispute be referred to a council, comprised of members of different Baptist Churches; that thereafter a council representing nine churches, heard the evidence of the dispute, and upon considering the laws of the Church, decision of Respondant Edwards was affirmed, and his action in declaring the resolution out of order, was approved. Your Respondants are advised that thereafter certain of the complainants held a conference, purporting to be a legal meeting of the officers of the Church, at which your Respondants are advised a resolution was adopted requesting Respondant Edwards to refrain from conducting services in said Church. That Respondant Edwards ignored said requests as improper, illegal and contrary to the rules and regulations of Baptist Square Church.

4.

Answering the fourth paragraph Respondants admit that on November 28th, 1926, Respondant Edwards entered the Church for the purpose of conducting services, always scheduled at 11 o'clock in the morning; that said Complainants in order to carry out their purpose, had, contrary to the custom and usage in said Church, gathered at 10 o'clock for the purpose of inducting *into* ~~into the Minister~~ in office, without legal authority, another person ^{as Pastor} in the place of Respondant Edwards, not legally selected as provided by the fundamental law of the Church. That although Respondant Edwards remonstrated at said attempt, he conducted himself as

4.

a gentleman and Minister of the Gospel, and exhorted the members to remain calm and not to resort to violence or abuse.

5.

Answering the fifth paragraph, Respondant Edwards admits attending a meeting of the Young Peoples Union of said Church, at which he was accompanied by fifty-two orphans, from the St. Lukes Orphanage, and members of said Young Peoples Union, and because of the action of one of the Complainants, James H. Cooper, in attempting to discriminate in the seating arrangements, Respondant Edwards admits becoming indignant, more especially when said Cooper, by his actions, made it impossible for said children to receive the benefit of the meeting; said Respondant Edwards, however, denies that any disturbance at said Meeting was caused by him.

6.

Answering the sixth paragraph, Respondants admit that Respondant Edwards insists on presiding at the monthly meetings of the Church and he is advised that as Assistant Pastor, duly designated by Minister of the Church, he is the only person entitled to preside, in the absence of the Minister; Respondant Edwards denies permitting members to vote on motions legally before the body but admits refusal on resolutions which in his opinion, were illegal and out of order.

7.

Respondants vigorously deny the ~~charges~~ false, scandalous, and improper charges of Complainants with respect to the character and ability of Respondant Edwards; that financially, numerically and spiritually, the Church is at present in better condition than it has been in years, and the great majority of its two hundred members are entirely satisfied

5.

with conditions and that this controversy is brought about by certain disgruntled members, who themselves rarely attend the services and who without proper training and ability, wish to arrogate to themselves the control of an institution dedicated to the worship of God.

8.

Respondants demur to said Bill of Complaint because the Complainants have not averred any allegations which entitle them to any relief in Equity.

9.

Respondants further demur ^{to} the said Bill of Complaint because said Bill does not allege such facts upon which a Court of Equity can pass the decree prayed for.

10.

Further answering, Respondant Williams further shows that he has diligently and throughout his entire life worked for the benefit of this Church and the members of its congregation; that he has given up his entire life work to the holy service in which he is engaged and that he has on many occasion financially assisted the Church and has never shirked from any duty, no whatever how onerous. That he has strictly complied with all rules and regulations of the Church and that the appointment by him of Respondant Edwards to officiate in his place was done with due forethought and deliberation and with sincere regard for the welfare of his congregation; that Respondant Edwards is a man of fine character, of ability, and a splendid person to discharge the irksome duties of the Ministry.

Having fully answered as they are advised, Respondants pray that said Bill of Complaint be hence dismissed with their reasonable costs.

And as in duty bound, etc.

Harry O. Severin
Solicitor for Respondant

Frank R. Williams

Rev. Sidney Edwards
Respondants

STATE OF MARYLAND, To Wit
CITY OF BALTIMORE,

I hereby certify that on this ~~12th~~ 4th day of December
nineteen hundred and twenty six, before me, ~~the~~ Subscriber,
a Notary Public of the State of Maryland, in and for the
City of Baltimore, personally appeared Frank R. Williams
and Sidney Edwards, and they severally made oath in due form
of law that the matters and facts stated in the above Answer,
are true and bone fide.

Witness my hand and Notarial Seal.

Seymour Phillips
Notary Public



Circuit Court

685
1922 a

Docket No.....

Pertuis Ag. Baptist Church

vs

Rev. Aubrey Edmund

Motion and Order Dissolution.

Mr. Clerk

Please File

Harry O Levin

Solicitor for Resp

a No. 4678

Filed 11th day of Dec 1922

Perkins Baptist Church

IN THE

CIRCUIT COURT

VS.

OF

BALTIMORE CITY.

Rev. Sidney Edwards et al

Term, 19

To the Honorable:

THE JUDGE OF SAID COURT.

The Defendant moves the

Court for the dissolution of the injunction heretofore issued in the above entitled cause.

Harry O. Levin
Solicitor.

ORDERED by the Court this _____ day of *Dec* 19*26*, that the motion for dissolution of the injunction heretofore issued in the above entitled cause stand for hearing on the _____ day of _____ 19____, with leave for either party to take testimony before one of the Standing Examiners of this Court to be used at the hearing, on giving to the opposite party or _____ Solicitor _____ days' notice, provided a copy of the motion and of this order be served on the Plaintiff or _____ Solicitor on or before the _____ day of _____ 19____.

True Copy:

Test: _____ Clerk.

IN THE CIRCUIT COURT OF
BALTIMORE CITY

685
1946

PERKINS SQUARE BAPTIST
CHURCH OF BALTIMORE CITY
et. al.

VS

REV. SIDNEY EDWARDS
et. al.

O R D E R

214678
29)

HARRY O. LEVIN
ATTORNEY AT LAW
BALTIMORE

J. H. [Signature] 1946

PERKINS SQUARE BAPTIST
CHURCH OF BALTIMORE CITY
et. al.

vs

REV. SIDNEY EDWARDS,
et. al.

:
:
: IN THE CIRCUIT COURT
:
:
: OF
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:
: BALTIMORE CITY
:

.....

O R D E R

Upon reconsideration of the Bill of Complaint in this case, it appearing to the Court that the injunction having been improvidently granted against the Defendant, Frank R. Williams, it is this 4th day of December, 1926, by the Circuit Court of Baltimore City, O R D E R E D that the said Injunction issued by the Court in these proceedings on December 3rd., 1926, be, and the same is, hereby ~~rescinded~~ ^{dissolved} as against the Defendant Frank R. Williams; and it having been made known to the Court that a meeting of the Church is to be held on December 8th., 1926, to elect a Pastor, it is O R D E R E D that at any service to be conducted prior to the said meeting, no person or persons shall officiate as Pastor, unless the Defendant Frank R. Williams is willing or able to officiate.

Critchfield

IN THE CIRCUIT COURT OF
BALTIMORE CITY

685
11956

PERKINS SQUARE BAPTIST
CHURCH

VS

REV. SIDNEY EDWARDS, et. al.

P E T I T I O N

Order

Mr. Clerk:-

Please file.

Harry O. Levin
Solicitors for Petitioners

214678
210)

HARRY O. LEVIN
ATTORNEY AT LAW
BALTIMORE

Dec 11 1956

PERKINS SQUARE BAPTISH
CHURCH

VS

REV. SIDNEY EDWARDS,
et. al.

:
: IN THE CIRCUIT COURT
:
: OF
:
: BALTIMORE CITY
:
:
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:

.. . . .

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

Your petitioners, Sidney Edwards and Frank R. Williams, respectfully represent:-

1:- That these proceedings were instituted on December 2nd., 1926, and that an injunction was issued against your petitioners, later modified by an order of this Court rescinding the injunction as against your petitioner Frank R. Williams.

2:- That your petitioners further represent that a regular meeting of the members of the said Congregation has been regularly called for December 8th., and that all provisions of the Church relating to the calling of said meeting have been complied with.

3:- That your petitioners believe it will be for the best interest of all concerned, in order to conduct the election without disturbance or disorder, that a person acceptable to all parties in this case be named by the Court to officiate and preside at said meeting, and that your petitioners suggest Rev. D. G. Mack, a well known Baptist minister of this City, who has on several occasions filled an office equivalent to Bishop, as the proper person to act as presiding officer, to act at the meeting to be held on the evening of December 8th., 1926.

WHEREFORE your petitioners pray that an order be passed accordingly.

Harry O. Lewis
Solicitors for petitioners

UPON the foregoing petition, it is this ^{8th} day of December, 1926, ORDERED by the Circuit Court of Baltimore City that Rev. D. G. Mack, be and he is hereby designated to officiate as the presiding officer at meeting to be held by the members of the Perkins Square Baptist Church to be held on the evening of December 8th., 1926, for the purpose of electing a Pastor and such other officers as are deemed necessary for the said Church.

Ernest

*Jewell
Davis & Evans*

RECEIVED AT
THE SHERIFFS OFFICE ON

DEC 14 1926 3 31 PM

*Davis & Evans
Dec. 15, 1926.
1.*

*215
St Paul*

CIRCUIT COURT

Circuit Court

685 a
1926

Docket No.....

*The Perkins Square
Baptist Church of
Baltimore City*

vs

*Rev. Sidney Edwards
Rev. F. R. Williams*

Motion and Order Dissolution.

Mr. Clerk

Please File

Respondents

Solicitor for

at 1467

No. *1467*

Filed *14* day of *Dec.* 19*26*

H

*Copy of the within Motion and Order of Court served on
Davis and Evans, Solicitors on the 15th day of December, 1926,
in the presence of Louis Hecht*

*John E. Foles
Sheriff*

Wes \$0.50

The Perkins Square Baptist Church
of Baltimore City.
David Morrel
James Johnson
P. D. Wilson
George W. Johnson
William Jefferson
John Francis
James H. Cooper
Parker Stratton
William Pollard, and
Harry S. Johnson

VS.

Rev. Sidney Edwards, and
Rev. F. R. Williams

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY.

Term, 19

To the Honorable:

THE JUDGE OF SAID COURT.

The Defendant moves the Court for the dissolution of the injunction heretofore issued in the above entitled cause.

Harry O. Lerin

Solicitor.

ORDERED by the Court this 14th day of December 1906, that the motion for dissolution of the injunction heretofore issued in the above entitled cause stand for hearing on the 27th day of December 1906, with leave for either party to take testimony before one of the Standing Examiners of this Court to be used at the hearing, on giving to the opposite party of this Solicitor 5th days' notice, provided a copy of the motion and of this order be served on the Plaintiff or their Solicitor on or before the 21st day of December 1906.

True Copy:

Ernst

Test: Clerk.

CIRCUIT COURT

685

19 76 a

Docket No.

Perkins Square Baptist
Church of Balto et al

v.s.

Rev. Sidney Edwards
et al.

ORDER OF APPEARANCE

Mr. Clerk

Please File

Joseph H. Berry Jr.
Sol. for

No. 14678

212
Filed 19th day of December 1976

Jenkins Square Baptist
Church of Balto. City, et al

vs.

Rev. Sidney Edwards,
et al

IN THE
Circuit Court
OF
BALTIMORE CITY

Dec. Term, 1924

Mr. WHITEFORD, Clerk.

Enter my appearance for Defendant

Josiah H. Berry, Jr.,
Solicitor

Perkins Square Baptist Church
of Balto. Ct. et al.

Circuit Court
of

vs
Rev. Sidney Edwards
Rev. F. R. Williams

Balto. Ct.

To The Honorable, the Judge of said Court
Your orators complaining respectfully
say that on or about the 3rd day of Dec. 1926
the filed in this court, a petition praying that
an injunction be issued against, the Rev.
F. R. Williams and Rev. Sidney Edwards,
enjoining and restraining them from acting
as pastor of the Perkins Square Baptist
church of Balto. that they desire to amend
the aforementioned bill by adding an
additional paragraph to be known as
paragraph 8, to read as follows

8. That in the ~~month of July~~ ^{16th day of November} 1926 a meet-
ing of the board of trustees and board of
deacons, the purpose of which meeting
was made known to the members of
the board of trustees and board of deacons
it was decided by a majority
vote of the members of the aforementioned

board that an action be filed in the courts
of Baltimore City, assaying that the Rev.
Sidney Edwards be precluded from
acting as pastor or assistant pastor of
Perkins Square Baptist Church of Balt
City and that the Rev. F. R. Williams be
precluded from acting as any thing but
pastor emeritus of the Perkins Square
Baptist Church of Baltimore City

~~James W. Cooper~~ Davis Evans
atty for complainant

State of Md To wit.
City of Balto

J. J. Spencer a notary public, in and for
the City of Baltimore, State of Maryland hereby
certify that James Cooper, secretary of the board
of trustees of Perkins Square Baptist Church
appeared and made oath in due form
of law that the matters and facts as stated
in the attached petitions are true to the best
of his knowledge and belief

J. J. Spencer
Notary Public

Ordered by the Circuit Court of Baltimore
City on this 18 day of Dec. 1926, that the petition
in the aforementioned bill, be amended as
prayed in transit

In the Circuit Court
of
Santo City A $\frac{685}{1976}$

Person of Church

5

Rev. F. R. Williams
et al

Order modifying
Injunction

A 14678

Mr. Clerk (14)
Please file

Harry O'Brien
Jank Henry

Sols for Deft

A. 18th December 1976

Penkins by Baptist Church
et al

v.

Rev. F. R. Williams et al

In the Circuit
Court of
Baltimore City

Ordered by the Circuit Court of
Baltimore City that the injunction
heretofore issued in this cause be modified
permitting the defendant Sidney Edwards
to officiate at the services on Dec. 19, 1926
as ~~acting~~ Pastor

Centron

In the Circuit Court
of Baltimore City

Q 685

1926

Perkins A. Baptist Church

vs

F. R. Williams

Order dissolving
dissolution

Q 14678

(15)

HARRY O. LEVIN
ATTORNEY AT LAW
BALTIMORE

Feb. 31" Dec. 1926

PERKINS SQUARE BAPTIST
CHURCH

VS

FRANK R. WILLIAMS,
et. al.

:
:
IN THE CIRCUIT COURT

:
OF

:
BALTIMORE CITY
:
:
:

.. . . .

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

The petition of Frank R. Williams and Sidney Edwards, Defendants, respectfully shows:-

1:- That as has been previously reported to the Court, an election was held on December 8th., at which the said Frank R. Williams was elected Pastor, and the said Sidney Edwards elected Assistant Pastor. That notwithstanding your petitioners understood that the Plaintiffs agreed to the manner, time and place of holding said election, after the result favorable to your petitioners became known, certain contentions were raised by the Plaintiff denying the legality and validity of the election.

2:- That after several conferences with the Court, it was determined that a second election be held according to certain suggestions made by the Court and on the 29th day of December, 1926, an election was held at which two ballots were taken, the first by male members alone, and the second by women members, and both votes cast showed the overwhelming election of your petitioners as Pastor and Assistant Pastor, respectively. That the said Election was attended by counsel for the respective parties, presided over by Rev. D.C. Mack, Moderator appointed by the Court, and a Court stenographer. That the election complied with all legalities and formalities, in accordance with an agreement prepared by

counsel for the respective parties, and your petitioners again assert that the Congregation has finally exercised its choice and that the Court should at once ratify their action.

WHEREFORE your petitioners pray that the injunction against your petitioner Sidney Edwards be dissolved and vacated.

AND as in duty bound, etc.

Harry O. Lewis
Joseph Henry Jr.
Solicitors for Petitioners

I hereby consent to the passage of an order dissolving and dismissing injunction heretofore granted.

Robert J. [Signature]
Solicitor for Plaintiffs

Rev. D. G. Mack,

2133 Druidhill Ave.,

Dear Sir:-

Judge Frank has again requested that you act as moderator at the meeting to be held, December, 29th., 1926 at The Berkin's Square Baptist Church, ^{for the purpose of electing Pastor and asst Pastor,} As the result of a conference between Judge Frank, Mr. Levin and myself, the following was agreed upon as a plan to be followed at the aforementioned meeting.

Two ballots shall be taken. One ballot with the male members alone voting. Another ballot with the male and female members both voting. The vote shall be by roll call and both the results shall be recorded. The roll call shall be from the register of the church and every member financial on December 29th., 1926 shall be permitted to vote; this applies, of course, only to members of 21 years or upwards.

It has also been suggested by the Court that a Court stenographer be present and that counsel for both sides attend.

By way of emphasis, I might add, that a member shall have the privilege of voting, even though the member does not pay up his or her arrears until the night of the meeting. Also, if the books indicate that a member is unfinancial, and if the member insists that he or she is financial, ^{or if any person insists that he is a member though not on either roll} the particular member shall be permitted to vote subject to the subsequent decision of The Court as to whether the particular member was or was not financial, ^{or was a member in fact.}

Yours

Sydney J. Steward Davis

Harry O. Levin

O R D E R

It appearing to the Court that in obedience to its suggestion, a meeting of the members of the Perkins Square Baptist Church was held on December 29th., 1926, for the purpose of electing Pastor and Assistant pastor of said Church; that said meeting was attended by counsel for the respective parties and was presided over by the Reverend D.G.Mack, as Moderator, and it further appearing, by the vote of a majority of the members of the Congregation, male and female, that Rev. Frank R. Williams was elected Pastor and Rev. Sidney Edwards Assistant Pastor, and the Solicitor for the Plaintiffs having agreed to the passage of this Order, it is this 31st day of December, 1926, O R D E R E D by the Circuit Court of Baltimore City, that the Injunction heretofore passed in this case against the Defendant Sidney Edwards, he and the same is hereby dissolved and vacated.

C. D. [Signature]