

IN THE CIRCUIT COURT OF

BALTIMORE CITY

633

11/19/76

JOHN C. KING et al

VS.

EMMA HOWARD, et al

309 E. Euter St.

PETITION & ORDER THEREON

Mr. Clerk:-

Please file.

Davis & Evans

ATTORNEYS FOR PETITIONERS

11/4633

(2) (4)

DAVIS & EVANS

ATTORNEYS AT LAW

H. C. November 1976

JOSEPH C.KING and
ELLANORA KING, his wife
and JOHN C.KING

IN THE CIRCUIT COURT

VS.

OF

Blanche
EMMA HOWARD and
~~MARJORIE KING~~

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orators complaining respectfully say:

1. That Joseph King is the nephew of Amanda Watts, deceased and Ellanora King is his wife, that John King is the grand nephew of Amanda Watts, deceased. Amanda Watts was in her lifetime and at the time of her death, seized and possessed in fee simple of 333 Rose street, ^{described as follows} Baltimore City, State of Maryland, as tenant by the entirety with her husband, Richard Watts, which Richard Watts predeceased the said Amanda Watts, leaving surviving him the aforementioned Amanda Watts, deceased. A copy of the Deed to the aforementioned Richard Watts deceased and Amanda Watts, deceased will be filed with the proceedings hereof and marked "Plaintiffs' Exhibit A".
2. That being so seized and possessed of the aforementioned property, the said Amanda Watts departed this life on or about the 8th day of September, 1926 without issue, leaving surviving her the following, all of whom are adults, a nephew, Joseph C. King, one grand-nephew, John King, Jr. and one grand niece, Emma Howard.
3. That Ellanora King is the wife of your Orator, Joseph C. King. That ^{Blanche} ~~Marjorie~~ King is the wife of your Orator, John King, Jr. and is a non-resident of the City of Baltimore, State of Maryland and when last heard of was in Norfolk, Virginia.
4. That irreconcilable differences have arisen amongst the parties hereto and that the said property is not susceptible of partition without material loss and injury to the parties entitled to interests therein as above stated and that in order

to make division of said interests it will be necessary that said property be sold and that the proceeds thereof divided amongst the parties according to their several interests.

TO THE END, THEREFORE:

- (a) That a decree may be passed for the sale of said property.
- (b) That the proceeds of said sale may be distributed between your Orator and the said defendants according to their respective rights and interests.
- (c) That a Trustee may be appointed to make sale and convey said property and distribute the proceeds of same under the direction of this Court.

May it please your Honor to grant unto your Orator the Writ of Subpoena directed against the said Emma *Howard* commanding and requiring her 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 also to grant unto your Orator an Order of Publication giving notice to the said ^{*Blanche*} ~~*Margie*~~ *King* a non-resident of the State of Maryland and last heard of in *Norfolk, Va.*, of the object and substance of this Bill, warning *her* to be and appear in this Court in person or by Solicitor on or before the _____ day of _____ 1926 to show cause, if any she may have, why a decree ought not be passed as prayed.

AND as in duty bound, etc.,

Deiss + Evans

SOLICITORS FOR PLAINTIFF

Joseph C. King
Ella Nora King
Plaintiffs
John G. King

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this 16 day of October, 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 Joseph C. King, and Ellanora King, his wife and John C. King, Jr. 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.

Helew C. Fisher
NOTARY PUBLIC.



J. STEWARD DAVIS, SOLICITORS,
215 ST. PAUL PLACE
IN THE CIRCUIT COURT OF BALTIMORE CITY

JOHN C. KING et al VS. EMMA HOWARD et al

The object of this suit is to have a trustee appointed to make sale of the property described in the Bill of Complaint for the purpose of partition.

The property described in the bill is as follows:

Beginning for the same on the southeasterly side of Rose Street at the distance of thirty-seven feet six inches more or less southwesterly from the corner of Eutaw and Rose Streets which place of beginning is designed to be at the centre of the alley two feet six inches wide between the house on the lot of ground now being described and the one next adjoining thereto on the northeast side thereof and running thence southwesterly bounding on Rose Street twelve feet six inches to lot No. II of the Poor House property thence southeasterly bounding on said Lot No. II about fifty six feet to the property fronting on Biddle Street which was heretofore conveyed to Hannah and Eliza Marsh, thence by a straight line bounding on said Hannah and Eliza Marsh's property twelve feet six inches more or less to a point that would intersect a line drawn from the beginning through the centre of the above mentioned alley and at right angles with Rose Street and thence southwesterly reversing said line and through the centre of said alley with the use of the same in common with the occupants of house next adjoining on the northeast side to the place of beginning.

The bill states that the plaintiff, Joseph C. King acquired an interest in the above property, he having been one of three surviving collateral relatives entitled to share the property by virtue of the intestate laws of the State of Maryland. Ellanora King, another of the plaintiffs, is the wife of Joseph C. King and that John King acquired an interest in the aforementioned described property; he also having been one of the three surviving collateral relations entitled to share in aforementioned estate; that ~~Marjorie~~ ^{Janice} King is the wife of John C. King and that

Emma Howard, the defendant, is the other of the three surviving collateral relations entitled to share in the aforementioned estate. The bill further alleges that the property is not susceptible of division without loss or injury to parties interested.

It is thereupon this 6 day of *November* 1926, by the Circuit Court of Baltimore City, ordered that the plaintiffs by causing a copy of this order to be inserted in some daily newspaper published in Baltimore City once a week in each of four successive weeks before the 7th day of *December* 1926, give notice to the absent defendant, *Marjorie King*, of the object and substance of this suit, warning her to be and appear in this Court in person or by Solicitor on or before the 13th day of *December* 1926 to show cause, if any she may have why a decree ought not be passed as prayed.

E. J. Rank

m 8, 15, 22, 29

Exhibit A.
S. C. L. No. 3672

SUPERIOR COURT

of BALTIMORE CITY

633
2 1976

ROOM 310

STEPHEN C. LITTLE

Clerk

COPY

DEED

FROM

William H Maltbie

14633

(2)

TO

(2)

Richard Watts &c

Liber... S. C. L. No. 3672... Fol. 389

Amount... \$3.25... Exd...

s. Paid

Pa. C. November 1976

William H Maltbie } THIS DEED Made this 22nd day of November in the
Deed to }
Richard Watts &c } year one thousand nine hundred and twenty by and
between William H Maltbie widower party of the first
party and Richard Watts and Amanda Watts his wife parties of the sec
ond part all of the City of Baltimore State of Maryland WITNESSETH That
in consideration of the sum of Five Dollars and other good and valu
able consideration the receipt whereof is hereby acknowledged the
said party of the first part does hereby grant and convey unto the
said parties of the second part as tenants by the entireties the sur
vivor of them their assigns and the heirs and assigns of the survivor
in fee simple all that lot of ground situate and lying in the City
of Baltimore aforesaid and described as follows that is to say BEGIN
NING for the same on the southeasterly side of Rose Street at the
distance of thirty seven feet six inches more or less southwesterly
from the corner of Eutaw and Rose Streets which place of beginning
is designed to be at the centre of the alley two feet six inches
wide between the house on the lot of ground now being described and
the one next adjoining thereto on the northeast side thereof and run
ning thence southwesterly bounding on Rose Street twelve feet six
inches to lot No 11 of the Poor House property thence southeasterly
bounding on said lot No 11 about fifty six feet to the property
fronting on Biddle Street which was heretofore conveyed to Hannah and
Eliza Marsh thence by a straight line bounding on said Hannah and
Eliza Marsh's property twelve feet six inches more or less to a point
that would intersect a line drawn from the beginning through the cen
ter of the above mentioned alley and at right angles with Rose Street
and thence southwesterly reversing said line and through the centre
of said alley with the use of the same in common with the occupants
of house next adjoining on the northeast side to the place of begin
ning BEING the same lot of ground described in a Deed from Richard
Watts and Amanda Watts his wife to the said William H Maltbie widower
of even date herewith and recorded immediately prior hereto among the
Land Records of Baltimore City TOGETHER with the buildings and im
provements thereupon erected made or being and all and every the
rights alleys ways waters privileges appurtenances and advantages
to the same belonging or in anywise appertaining TO HAVE AND TO HOLD

the above described piece or parcel of ground unto and to the use of the said Richard Watts and Amanda Watts his wife as tenants by the entireties the survivor of them their assigns and the heirs and assigns of the survivor forever in fee simple AND the said party of the first part covenants that he will warrant specially the property hereby granted and conveyed and that he will execute such further assurances of said land as may be requisite WITNESS the hand and seal of the said grantor

TEST P August Grill

William H Maltbie (SEAL)

STATE OF MARYLAND CITY OF BALTIMORE SCT

I HEREBY CERTIFY That on this 22 day of November 1920 before me the subscriber a Notary Public of the State of Maryland in and for the City of Baltimore aforesaid personally appeared William H Maltbie the within named Grantor and acknowledged the foregoing Deed to be his act WITNESS my hand and Notarial Seal

(P August Grill)
(Notary Public)
(Baltimore Md)

P August Grill
Notary Public

Recd for record Nov 22 1920 at 1.16 o'clk P M Same day recorded & exd per Stephen C Little Clerk

I HEREBY CERTIFY that the foregoing is a true copy taken from Liber S C L No 3672 folio 389 &c one of the Land 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 25th day of October A D 1926

Stephen C. Little
Clk of the Superior Court of Baltimore City



Suby vama never returned
by Sheriff. (3) (3)

CIRCUIT COURT

1976

Docket No. 66 A 633

Joseph King Etal

vs.

Emma Howard Etal

ORDER OF APPEARANCE

Mr. Clerk

Please File

Henry M. Daniels

Sol. for Emma Howard

No. 14633 (5)

Filed 17th day of December 1976

Joseph King Et al

vs.

Emma Howard Et al

IN THE
Circuit Court
OF
BALTIMORE CITY

Term, 19

Mr. WHITEFORD, Clerk.

Emma Howard

Enter my appearance for ~~Defendant~~

Henry M. Daniels

109 E. Pleasant St.

Solicitor

CIRCUIT COURT

1926

668A.
Docket No. 633

John King et al
v.s.

Emma Howard et al

ORDER OF APPEARANCE

Mr. Clerk

Please File

Henry W. Daniels

Sol. for

Mrs. Jorie King sometimes ~~known as~~
known as Blanche King

No. 14637 (33)

6-21-26 (26)
Filed 11th August 1926

John King et al

vs.

Eneas Howard et al

IN THE
Circuit Court
OF
BALTIMORE CITY

Term, 19

Mr. WHITEFORD, Clerk.

Marjorie King sometimes known as
Blanche King
~~Enter my appearance for Defendant~~

Henry M. Daniels

Solicitor

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

633
4976

JOSEPH C.KING, et al

VS.

EMMA HOWARD, et al

PETITION & ORDER THEREON

Mr. Clerk:-

Please file.

Davis & Evans
Attorneys for Plaintiff

*a 14633
L7)*

DAVIS & EVANS
ATTORNEYS AT LAW

15 December 1906

JOSEPH C.KING and
ELANORA KING, his wife
and JOHN C.KING

:

IN THE CIRCUIT COURT

VS.

:

OF

EMMA HOWARD and
MARGORIE KING

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orators respectfully say:

That on or about the 6th day of Nov. 1926 they filed in this Honorable Court a petition praying the sale of the premises known as No. 332 Rose St. Baltimore City, Maryland; that inadvertently your Orators stated that the name of the wife of John C. King was Marjorie King whereas her correct name is Blanche King.

WHEREFORE YOUR ORATORS PRAY:

That the original petition be amended so that the aforementioned Marjorie King will read Blanche King.

Davis & Evans

ATTORNEYS FOR PLAINTIFFS.

Ordered this 5th day of *December* 1926 by the
Circuit Court of Baltimore City that the petition be amended as
prayed.

critchfield

IN THE CIRCUIT COURT OF
BALTIMORE CITY

133
11526

JOSEPH C. KING, et al

VS.

EMMA HOWARD, et al

RE: RESPONDENTS' ANSWER

Mr. Clerk:-

Please file.

Henry M. Daniels

Attorney for Respondents

214633

(28)

[Handwritten signature/initials]

(8)

Dec 15 1922

JOSEPH C.KING and
ELANORA KING, his wife
and JOHN C.KING

:

IN THE CIRCUIT COURT

VS.

:

OF

EMMA HOWARD and
MARJORIE KING

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your defendants to the above entitled cause respectfully says:

1. That they admit the allegations contained in the first paragraph of the bill of complaint.
2. That they admit the allegations contained in the second paragraph of the bill of complaint.
3. That they admit the allegations contained in the third paragraph of the bill of complaint but Marjorie King avers however, that her correct name is Blanche King and not Marjorie King and that she is not a resident of Norfolk, Virginia but is a resident of Baltimore, Maryland.
4. That they admit the allegations contained in the fourth paragraph of the bill of complaint.

WHEREFORE your respondents assent to granting of relief as prayed by the Orators.


ATTORNEY FOR RESPONDENTS.

192.....

a 633
1926
Docket No.....

King

et al

vs.

Howard

et al

~~Rapp~~

Certificate of Publication

a 14633

(9)

(9)

THE DAILY RECORD

Filed 23rd day of Dec 1926

THE DAILY RECORD

Baltimore, NOV 29 1926, 192.....

J. Steward Davis, Solicitor,
215 St. Paul Place.
IN THE CIRCUIT COURT OF BALTI-
MORE CITY—(A—633—1926) — John C.
King et al. vs. Emma Howard et al.
ORDER OF PUBLICATION.

The object of this suit is to have a trustee appointed to make sale of the property described in the bill of complaint for the purpose of partition.

The property described in the bill is as follows:

Beginning for the same on the southeasterly side of Rose street at the distance of thirty-seven feet six inches more or less southwesterly from the corner of Eutaw and Rose streets which place of beginning is designed to be at the centre of the alley two feet six inches wide between the house on the lot of ground now being described and the one next adjoining thereto on the northeast side thereof and running thence southwesterly bounding on Rose street twelve feet six inches to lot No. 11 of the Poor House property thence southeasterly bounding on said lot No. 11 about fifty-six feet to the property fronting on Biddle street which was heretofore conveyed to Hannah and Eliza Marsh, thence by a straight line bounding on said Hannah and Eliza Marsh's property twelve feet six inches more or less to a point that would intersect a line drawn from the beginning through the centre of the above mentioned alley and at right angles with Rose street and thence southwesterly reversing said line and through the centre of said alley with the use of the same in common with the occupants of house next adjoining on the northeast side to the place of beginning.

The bill states that the plaintiff, Joseph C. King, required an interest in the above property, he having been one of three surviving collateral relatives entitled to share the property by virtue of the intestate laws of the State of Maryland. Ellanora King, another of the plaintiffs, is the wife of Joseph C. King and that John King acquired an interest in the aforementioned described property; he also having been one of the three surviving collateral relations entitled to share in aforementioned estate; that Marjorie King is the wife of John C. King and that Emma Howard, the defendant, is the other of the three surviving collateral relations entitled to share in the aforementioned estate. The bill further alleges that the property is not susceptible of division without loss or injury to parties interested.

It is thereupon this 6th day of November, 1926, by the Circuit Court of Baltimore City, ordered that the plaintiffs by causing a copy of this order to be inserted in some daily newspaper published in Baltimore City once a week in each of four successive weeks before the 7th day of December, 1926, give notice to the absent defendant, Marjorie King, of the object and substance of this suit, warning her to be and appear in this Court in person or by solicitor, on or before the 23rd day of December, 1926, to show cause, if any she may have, why a decree ought not be passed as prayed.

ELI FRANK.

True Copy—Test:

CHAS. R. WHITEFORD,

n8,15,22,29

Clerk.

We hereby certify that the annexed advertisement of Order Publication..... Circuit Court

of Baltimore City, Case of.....

John C. King et al
vs. Emma Howard et al

was published in THE DAILY RECORD, a daily newspaper published in the City of Baltimore, once in each of

four successive weeks before the
7th day of December, 1926

First insertion November 8th, 1926

23 Ill THE DAILY RECORD

Per George C. Linn

notice of Publication
THE DAILY RECORD
185

Doc. A. 633
1926

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Joseph C. King
et al

vs.

Emma Howard
et al

No. 14633A

PLAINTIFF'S COSTS

Examiners \$
Copies
Sheriff
Stenographer
\$

DEFENDANT'S COSTS

Examiners \$
Copies
Sheriff
Stenographer
\$

Feb 9 1927

Joseph C. King
et al

vs.

Emma Howard,
et al

In the Circuit Court
OF BALTIMORE CITY.

Pursuant to agreement of counsel

and notice having been given me by the Solicitor for the plaintiff
of a desire to take testimony in the same, I, A. de RUSSY SAPPINGTON, one
of the Standing Examiners of the Circuit Courts of Baltimore City, under and by
virture of an order of the above named Circuit Court, passed in said cause on the
..... day of.....19....., met on
the 27th day of December.....in the year nineteen
hundred and twenty six.....at my office, in the city of Baltimore, in the State
of Maryland, and assigned the 27th day of December
in the same year at three o'clock in the afternoon and the
office of the Examiner.....in the City and State
aforesaid, as the time and place for such examination of witnesses in said cause;
at which last mentioned time and place I attended, due notice of such meeting
having been given, and proceeded in the presence of the Solicitor..... of the
respective parties.....to take the following depositions, that
is to say:—

JOSEPH C. KING, et al,

vs.

EMMA HOWARD, et al.

Testimony taken before me, A. deRussy Sappington, Examiner, at my offices in the Title Building, Baltimore, Md. on December 27, 1926, at 3.00 o'clock in the afternoon

Mr. J. S. Davis appeared for the Plaintiffs.

Mr. Henry M. Daniels appeared for the Defendants.

Thereupon---

JOSEPH C. KING,

a witness of lawful age, produced on behalf of the plaintiffs, having been first duly sworn according to law, was examined and testified as follows:

By the Examiner:

Q State your name, residence and occupation?

A Joseph C. King, 620 Bradley Street, no occupation. I am sixty-nine years old.

Q Do you know the parties to this suit?

A Yes.

By Mr. Davis:

Q Did you know Amanda Watts?

A Yes, sir. She was my aunt. She lived at 324 Rose Street.

Q Was she married?

A Yes, she was married to Richard Watts.

Q Who predeceased the other?

A He died before her. He died about three or four years before Amanda Watts.

Q Is Amanda Watts living?

A No, she died on September 8, 1986, in Baltimore City.

Q Is Amanda Watts' mother living, or her father?

A No, both are dead.

Q Did Amanda Watts have any children?

A No.

Q Did she have any brothers or sisters?

A Three brothers; Henry King, John King, and Sam King. She had no daughters.

Q Are the three you mentioned all the brothers she ever had

A Yes.

Q What is Amanda Watts' sisters name?

A Margaret.

Q John King was the brother of Amanda Watta?

A Yes, but he is dead. I knew him for fifty or sixty years in his lifetime. He has been dead about twenty years. I knew him from the time of my childhood until he died.

Q Did John King have any children?

A One son; Charlie King. That was his only child.

Q What was John King's wife's name?

A Martha King. She is dead. I knew her during her lifetime, but she has been dead now about ten years.

Q Did she die before or after John King?

A After.

Q The only child of of Martha and John King was Charles King. Is Charles King living?

A No, sir, he is dead. He was married and his wife's name was Ella.

Q Were any children born as result of their marriage?

A One; John King Jr.

Q John King is sometimes known as John King Junior?

A Yes. He was the only son of Charles and Ella King.

Q Both Ella and Charles King are dead?

A Yes.

Q Did they die before or after Amanda Watts?

A Before.

Q Is John C. King Jr. married or single?

A Married. His wife's name is Blanche King.

There is his wife (indicating)

Q Has he any children?

A No.

Q Where is John King living now?

A In Baltimore City - he was living at
1029 Druid Hill Avenue.

Q Now, Sam King?

A He was a brother of Amanda Watts, and he
has been dead thirty-six years. He was married and
had two children - Joseph King and Sarah King. His
wife's name was Isabella King, and she is dead. She
has been dead for fifty years.

Q Isabella King was your mother?

A Yes, and she and my father, Sam King, are
both dead.

Q Is Sarah King, your sister, living or dead?

A Dead. She was married to Henry Howard,
and he is dead.

Q Did they have any children?

A One, Emma Howard. She is living. She
lives at 309 Exeter St., Baltimore, Maryland.

Q Did Sarah King have any other children?

A No.

Q Now, Joseph King, that is you?

A Yes. I am married to Eleanor King, here, (indicating).

Q Henry King was also a brother of Amanda Watts?

A Yes. He is dead - he died about fifty years ago. He was married to Sallie King, but she is now dead.

Q Were any children born as result of their marriage?

A One; Jennie King. She is dead - she has been dead about twenty years. She was never married, and had no children.

Q Was was the name of Amanda King's sister?

A Margaret. She is dead, and has been dead sixty years. She was married to Jim Ballett, and he has been dead for forty or fifty years.

Q Do you know a boy named Joseph Simms?

A I know of him.

Q You have known Amanda Watts all during your lifetime?

A Yes, since she was twelve years old, and I knew all her brothers and sisters.

Q And you have heard them discuss the family relationship?

A Yes.

Q Did you ever hear Amanda Watts or any of her brothers say that Joseph Simms was a half brother of Amanda Watts?

A No, I never did.

Q You have been close to Amanda Watts and her brothers all your life?

A Yes. I worked for her brother.

Q And you heard nothing about this Simms boy?

A No, sir.

(NO CROSS EXAMINATION.)

On February 18, 1927, Joseph C. King was recalled and the following questions propounded to her:

By Mr. Davis:

Q Did Amanda Watts die intestate or did she leave a will?

A She did not leave a will.

Q Has her estate ever been administered in the Orphans Court?

A I don't think so, no, sir.

Q Did her sister, Margaret, die before or after Amanda Watts?

A Before her.

Q Did she leave any children?

A No, Margaret never had any children.

Q Did the father and mother die before Amanda Watts?

A They died before - when she was small.

Q Did Sarah Howard, the Mother of Emma, die before or after Amanda Watts?

A She died before.

Q Where is the property situated that Amanda Watts died possessed of?

A ³³³~~334~~ Campbell Street. It is a three story brick dwelling. It is sometimes called Rose Street.

8 (b)

Q Is it capable of being divided in kind amongst those entitled thereto?

A No, it is impossible to divide it into three parts. The only way it can be divided is to sell it and divide the proceeds.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this, your examination, or the matters in question between the parties? If so, state the same fully and at large in your answer.

A. ----

No Joseph King

Thereupon---

ELEANOR KING,

a witness of lawful age, produced on behalf of the plaintiffs, having been first duly sworn according to law, was examined and testified as follows:

By the Examiner:

Q State your name, residence and occupation?

A Eleanor King, 620 Bradley St., housewife

Q Do you know the parties to this suit?

A I do.

By Mr. Davis:

Q You have heard the testimony of the previous witness concerning the family?

A I have.

Q Is your testimony the same as the testimony of Mr. Joseph King?

A It is.

Q May I ask you your age?

A I will be sixty the 31st of next month.

Q Is there anything you can add to or detract

from the testimony of Mr. King?

A No, it is all correct, and that is about all I could say.

(No cross examination.)

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this, your examination, or the matters in question between the parties? If so, state the same fully and at large in your answer.

A. ----- No Ella Nora King

Thereupon---

BLANCHE KING,

a witness of lawful age, produced on behalf of the Defendants, having been first duly sworn according to law, was examined and testified as follows:

By the Examiner:

Q State your name, residence and occupation?

A Blanche King, 1411 Orleans St., housework

Q Do you know the parties to this suit?

A I do.

BY MR. DANIELS:

Q Do you know John C. King Jr.

A Yes, he is my husband.

Q When and where were you married?

A August 19, 1924, in Baltimore, Md.

Q It was stated in the original bill that you were out of the City. You, of course, are in the City now?

A Yes. I have been here and was married here.

Q Is this the same John C. King that has been talked about by the previous witness?

A Yes.

Q Did you know Amanda Watts?

A Yes.

Q Was he related to Amanda Watts?

A Yes. She was his Grand aunt, and he is the grandson of John King, son of Charles King.

Q They are all dead?

A Yes.

Q Did you know Emma Howard?

A Yes.

Q Is she related to the family?

A Yes, sir.

(No cross examination.)

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of the parties to this suit, or either of them, or that may be material to the subject of this, your examination, or the matters in question between the parties? If so, state the same fully and at large in your answer.

A. -----

No
Blanche King

No other witnesses being named or produced before me, I then, at the request of the Solicitor.....of the Plaintiff.....closed the depositions taken in said cause and now return them closed under my hand and seal, on this March.....day of February.....in the year of Our Lord nineteen hundred and twelve.....at the City of Baltimore, in the State of Maryland.

A. de Russy Sappington (SEAL)
Examiner.

There are is.....Exhibits with these depositions, to wit:
Plaintiff's..... Exhibit A heretofore filed in this cause.....

Defendant's..... Exhibit

A. de Russy Sappington
Examiner.

I, A. de RUSSY SAPPINGTON, the Examiner before whom the foregoing depositions were taken, do hereby certify that I was employed in assigning a day, and taking the said depositions upon two.....days, on both.....of which I was employed by the Plaintiff is....., and on none.....by the Defendant.....

A. de Russy Sappington
Examiner.

Circuit Court

633a
1926

Docket

Joseph H. Fugate

vs.

Emma Howard et al

SUBMISSION FOR DECREE.

Mr. Clerk,
Please file,

Davis & Evans

Solicitor for Plaintiff.

No.

14633

(11)

Filed

10th February

1927

Joseph Kungelal

vs. Emma Howard

In the Circuit Court
of Baltimore City

TERM, 19__

To the Honorable

Judge of Said Court:

The above cause is respectfully submitted for
decree and the 43rd General Equity Rule is hereby waived.

Devis & Evans

Solicitor for Plaintiff,

Henry M. Daniels

Solicitor for Defendant.

a 633-1926

Circuit Court

633

1926

a

Docket No. _____

Joseph King et al

vs.

Emma Howard et al

**Order of Reference
and Report**

No. 14633

(12) (12)

Order Filed 10th day of July 1927

Report Filed 5th day of July 1927

Circuit Court

BALTIMORE CITY

Joseph King et al

vs.

Anna Howard et al

IN THE
Circuit Court

OF
BALTIMORE CITY

Term, 192

This case being submitted, without argument, it is ordered by the Court, this 10th

day of February, 1927, that the same be and it is hereby referred to

William P. Lyons

, Esq., Auditor and Master, to report the

pleadings and the facts, and his opinion thereon.

James P. Gorten

Report of Auditor and Master

The bill in this case was filed for a sale of fee simple property located in Baltimore City on the ground that the same could not be divided without loss or injury to the parties interested. Code Art. 16, Sec. 152.

All the parties are sui juris. The defendants answer.

Testimony filed proves the pedigree and that the property cannot be divided without loss or injury to the parties interested.

The property belonged to Amanda ^{deceased} Watts and no letters of administration have been granted on her estate, and the decree should provide for notice to her creditors in accordance with Article 93, Section 114.

There is no testimony as to the value of the property, but the plaintiff's attorney says it does not exceed fifteen hundred dollars.

Case submitted and ready for decree.

William P. Lyons

March 7, 1927

Auditor and Master

Circuit Court

⁶³³
19 26 **A** No. Docket.

JOSEPH C. KING,

et al,

vs.

EMMA HOWARD,

et al

Decree.

A. No. 14633

(13) (13)

Filed 5th June 1927

DECREE IN THE CIRCUIT COURT OF BALTIMORE CITY.

JOSEPH C. KING, et al,

vs.

EMMA HOWARD, et al

IN THE
Circuit Court
OF
BALTIMORE CITY.

Term 19

The above cause standing ready for hearing and being submitted

the Bill

and all the other

proceedings were, by the Court, read and considered—

It is thereupon, this 5th day of April in the year nineteen

hundred and twenty-seven, by the Circuit Court of Baltimore City, **ADJUDGED, ORDERED and DECREED**, that the property No. 33³ Rose Street, Baltimore City, the

property mentioned in the proceedings be sold, that George W. Evans be and he is hereby

appointed ^{to collect the rents and} Trustee, to make said sale, and that the course and manner of his proceedings shall be as follows: he shall first file with the clerk of this Court, a bond to the State of Maryland, executed by himself, and a ^{corporate} surety or sureties to be approved by this Court, in the penalty of Fifteen Hundred (1500) - - - - - Dollars, conditioned for the faithful performance of the trust reposed in him by this decree, or to be reposed in him by any future Decree or Order in the premises; he shall then proceed to make the said sale, having given at least three weeks notice by advertisement, inserted in such daily newspaper or newspapers published in the City of Baltimore, as he shall think proper, of the time, place, manner and terms of sale, which shall be Cash; - - - - -

and as soon as may be convenient after any such sale or sales, the said Trustee shall return to this Court a full and particular account of his proceedings relative to such sale; with an annexed affidavit of the truth thereof, and of the fairness of said sale; and on obtaining the Court's ratification of the sale, and on payment of the whole purchase money, (and not before,) the said Trustee shall, by good and sufficient deed, to be executed, acknowledged and recorded according to law, convey to the purchaser or purchasers, his, her, or their heirs, the property and estate to him, her, or them sold, free, clear and discharged from all claim of the parties hereto, Complainants and Defendant s, and those claiming by, from or under them or either of them. And the said Trustee shall bring into this Court the money arising from said sale, to be distributed under the direction of this Court after deducting the costs of this suit, and such commission to the said Trustee as this Court shall think proper to allow in consideration of the skill, attention and fidelity wherewith he shall appear to have discharged his trust. And the trustee herein is hereby directed, by advertisement to be inserted in some paper published in Baltimore City once in each of four successive weeks before the day of 1927, to give notice to all persons having claims against the estate of said Amanda Watts, deceased, to file their claim properly authenticated with the Clerk of this Court, on or before the day of 1927.

H. Arthur Stunk

This is a proper decree to be passed in this case William P. Lyons, Auditor and Master

Not in session 90 days

Sol 1000
ilk 53 95
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copy 500
Sol 1000
Add H 25 pay for 10

CIRCUIT COURT

19 **A** No. Docket.

Joseph C. King
et al

vs.
Emma Howson
et al

Decree.

A. No.

Filed 19

DECREE IN THE CIRCUIT COURT OF BALTIMORE CITY.

Joseph C. Hugand
Eleanor King, Plaintiff
John King vs
Eunna Howard
Marjorie Howard

IN THE
Circuit Court
OF
BALTIMORE CITY.

Term 19

The above cause standing ready for hearing and being submitted
the Bill and all the other
proceedings were, by the Court, read and considered—

It is thereupon, this Twenty Seven day of July in the year nineteen
hundred and Twenty Seven by the Circuit Court of Baltimore City, **ADJUDGED, ORDERED**

and DECREED, that ~~Back dwelling known as~~
~~334 Rose St~~
~~the property known as~~ the property - 334 Rose street,
Baltimore City,

the property mentioned in the proceedings be sold, that
George W. Evans be and he is hereby

appointed **TRUSTEE** to make said sale, and that the course and manner of his proceedings shall be
as follows: he shall first file with the clerk of this Court, a bond to the State of Maryland,
executed by himself, and a surety or sureties to be approved by this Court, in the penalty of
\$1500. Dollars,

conditioned for the faithful performance of the trust reposed in him by this decree, or to be reposed in
him by any future Decree or Order in the premises; he shall then proceed to make the said
sale, having given at least three weeks notice by advertisement, inserted in such daily newspaper or newspapers
published in the City of Baltimore, as he shall think proper, of the time, place, manner and terms of
sale, which shall be Three hundred dollars deposit on day

of sale, unless required by purchaser, and also upon
ratification of sale by circuit court, all expenses
to be adjudged as of day
cash

and as soon as may be convenient after any such sale or sales, the said Trustee shall return to this Court a full
and particular account of proceedings relative to such sale; with an annexed affidavit of the truth thereof,
and of the fairness of said sale; and on obtaining the Court's ratification of the sale, and on payment of the
whole purchase money, (and not before), the said Trustee shall, by good and sufficient deed, to be executed,
acknowledged and recorded according to law, convey to the purchaser or purchasers, his, her, or their heirs, the
property and estate to him, her or them, sold, free, clear and discharged from all claim of the parties hereto,
Complainant and Defendant, and those claiming by, from or under them or either of them. And the said
Trustee shall bring into this Court the money arising from said sale, to be distributed under the direction of this
Court after deducting the costs of this suit, and such commission to the said Trustee as this Court shall
think proper to allow in consideration of the skill, attention and fidelity wherewith he shall appear to
have discharged his trust. As a the trustee person of

Q 633
1926

Trustee

App. Bond.

Bond Book #24

Folio -

Q 14633

(14)

14

Ed. 6" April 1927

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

633
1926 A

J. L. HOWARD ET AL

VS.

EMMA HOWARD, et al.

PETITION & ORDER THEREON.

Mr. Clerk:-

Please file.

Georgew Evans

ATTORNEY

W/H 633

DAVIS & EVANS

ATTORNEYS AT LAW

Ad. J. J. J. 1926

JOSEPH C.KING et al

:

IN THE CIRCUIT COURT

VS.

:

OF

ELMA HOWARD, et al

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The petition of George W. Evans, Trustee, respectfully says:

- I. That George W. Lindsay and Sons, have collected the rents on property 333 Rose Street since the death of Amanda Watts.
2. That they are willing to turn said rents over to your petitioner so collected.

WHEREFORE YOUR PETITIONER PRAYS:

- (a) That this court pass an order that George W. Lindsay and Sons turn over to George W. Evans, Trustee, all monies held by them as rent for property 333 Rose street.
- (b) Such other and further relief as the case may require.

George W. Evans, Trustee,

JOSEPH C.KING, et al

:

IN THE CIRCUIT COURT

VS.

:

OF

EMMA HOWARD, et al

:

BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this 9th
day of April, 1927 that George W. Lindsay and Sons be and they are
hereby authorized to turn over to George W. Evans, Trustee, all
monies held by them as rent for property 333 Rose street.

James P. Gortler

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

633
1926 A

JOHN J. DILLON, et al.

VS.

MRS. HOWARD, et al.

notice to creditors

~~ORDER OF COURT.~~

Mr. Clerk:-

Please file.

Geo. J. Evans
ATTORNEY.

DAVIS & EVANS
ATTORNEYS AT LAW

W. J. Davis
1926

JOSEPH C. KING, et al

:

IN THE CIRCUIT COURT

VS.

:

OF

EMMA HOWARD, et al

:

BALTIMORE CITY.

Ordered by the Court this *12*" day of April, 1927 that George W. Evans, the Trustee in the above entitled cause named, give notice to all persons having claims against Richard Watts or Amanda Watts late of 333 Canal Street, formerly Rose street, to file their claims properly authenticated with the Clerk of the Circuit Court of Baltimore City, on or before the *12*' day of *July* 1927 by causing a copy of this Order to be published in some daily newspaper in Baltimore City, once a week for three successive weeks, before the *12*" day of *May* 1927.

H. Arthur Plump

George W. Evans
Trustee

#215 of same
place

May 11, 1927, Service
admitted

Devis + Evans

633

JOHN C. KING et al
vs
EMMA HOWARD et al

633
1926

IN THE
CIRCUIT COURT OF BALTIMORE CITY

PETITION FOR ALLOWANCE OF CLAIM
OF
JENNIE PALMER

a14633

(17)

MR CLERK,
PLEASE FILE

Edward B. Lowndes

EDWARD B. LOWNDES
ATTORNEY AT LAW
1009 CALVERT BUILDING
BALTIMORE, MARYLAND

11 May 1927
H

Copy of the within Petition and Order of Court served on
George W. Evans, Trustee on the 11th day of May, 1927,
in the presence of Louis Hecht.

Geo Passo John C. Folee
Scribble

MAY 11 1927

RECEIVED
THE SHERIFF

JOHN C. KING et al)
vs)
EMMA HOWARD et al) IN THE
CIRCUIT COURT OF BALTIMORE CITY

To the Honourable the Judge of said Court.

The petition of Jennie Palmer of Baltimore, Maryland. respectfully represents unto your Honour:

(1) That your petitioner was, during the month of September, 1923 employed by Amanda Watts, then living at 343 Rose Street, (now Camel Street) this city, who was a paralytic, to do general nursing and housework for her, the said Amanda Watts at and for the sum of four dollars(\$4.00) per week and that your petitioner did said nursing and housework as agreed from September 1923 until September 8th, 1926 upon which date the said Amanda Watts died.

(2) That many times prior to September 8th, 1926. the said Amanda Watts acknowledged her indebtedness to your petitioner and promised to pay same and on several occasions promised your petitioner that she would be paid in full out of her, the said Amanda Watts' estate at her death.

(3) That your petitioner however has never been paid for her said services to the said Amanda Watts nor has she at any time been paid any part of said indebtedness. Nor has she received at any time any security for same.

(4) That your petitioner's claim amounts at this time to the sum of seven hundred and three dollars and ninety-six cents(\$703.96) as shown by the statement with proof of claim hereunto annexed and prayed to be taken as part hereof.

(5) That said Amanda Watts died on the 8th, day of September 1926 intestate, seized and possessed of the fee simple property known as No. 333 Camel Street, (formerly Rose Street) in this city,

but owning no other property so far as is known to your petitioner.

(6th) That no letters of administration have been granted upon the estate of the said Amanda Watts but that on or about the 6th, day of November, 1926 certain collateral heirs of the said Amanda Watts filed in this Court a bill for the sale of said fee simple property No. 333 Camel Street for the purpose of partition (the hereinabove entitled cause) as will more fully appear by reference to said bill of complaint; that after the usual proceedings in such matters, on or about April 5th, 1927 a decree was signed by this Honourable Court appointing George W. Evens trustee to sell the aforesaid real estate, and to collect certain rents due on same and providing for the publication of notice to creditors of said Amanda Watts deceased etc.

Your petitioner therefore prays your Honour to pass an order directing that the claim of your petitioner be paid out of the proceeds of said sale of said real property.

And Your Petitioner will ever pray etc.

Jennie Palmer
her
Mark
Petitioner.

Edward S. Lowndes

SOLICITOR FOR PETITIONER

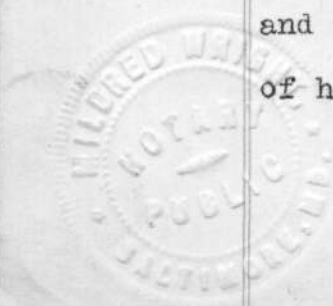
Witness
Rovence M. Stoops

STATE OF MARYLAND, BALTIMORE CITY to wit.

I hereby certify that on this 10 day of May, in the year 1927, before me the subscriber, a notary of public of the State of Maryland in and for the City of Baltimore aforesaid, personally appeared Jennie Palmer and made oath in due form of law that the matter and facts set forth in the foregoing petition are true to the best of her knowledge and belief

Mildred Wright

Notary Public



Baltimore , Maryland. May 1927.

- Account and Proof of Claim -

Estate of Amanda Watts, deceased

To Jennie Palmer- - - - - Dr

For general nursing and housework at agreed rate of \$4.00 per week from September 1923 to September 1926.	\$624.00
Interest on unpaid account to May 1st, 1927	79.96
	<u>\$703.96</u>

STATE OF MARYLAND, BALTIMORE CITY to wit:

I hereby certify that on this 10 day of *May* in the year 1927, before me the subscriber, a notary ~~of~~ public of the State of Maryland in and for the City of Baltimore aforesaid, personally appeared Jennie Palmer and made oath in due form of law that the annexed account as stated is just and true and that she has not received any part of the money atated to be due or any security or satisfaction for the same except what if any is credited.

Mildred Wright

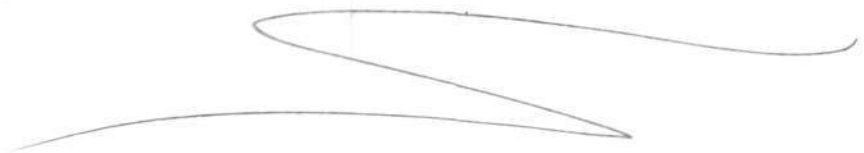
NOTARY PUBLIC



ORDERED this 11th day of May 1927,

by the Circuit Court of Baltimore City that George W. Evans, Trustee, be and he is hereby ordered and directed to pay to Jennie Palmer, petitioner herein, the sum of seven hundred and three dollars and ninety-six cents (\$703.96), the amount in full of her claim, out of the proceeds of sale of property known as No. 333 Camel street, unless cause to the contrary be shown on or before the 21st day of May, 1927, and provided a copy of this petition and of this order be served on the said George W. Evans, Trustee, on or before the 17th day of May, 1927, and subject to the usual exceptions.

H. Arthur Stump



65A-633

1926

In the
Ct Ct of Baltimore

John King
vs
Blanch King
and
Emma King
with;
Geo W. Evans
Trustee

Plaintiff,

Mr Clerk:
Please file etc

44633

(18) (18)

W. Grant Pyles
and

JOHN H. HAMPTON
ATTORNEY AT LAW
14 E. PLEASANT STREET
BALTIMORE, MD.

W. Grant Pyles
May 1927

LUCAS BROS., INC., BALTIMORE

JOHN C. KING * IN THE
VS. * CIRCUIT COURT OF
BLANCHE KING and * BALTIMORE CITY.
EMMA HOWARD. *

To the Honorable, the Judge of the aforesaid Court.

The Petition of Rebecca Hawkins, respectfully says:

I.

That the Petitioner in the lifetime of Amanda Watts, during her last illness and for a period of more than six years, nursed and attended her; for which nursing and attendance she claims the sum of FIVE HUNDRED DOLLARS, no part of which has been paid her.

II.

The Vouchers are herewith attached and marked Exhibits (A) and (B) and prayed to be taken as part of this petition.

*M. Grant Tyler and
John H. Hampton*
III. Solicitors for Petitioner.

Upon the foregoing Petition, Affidavit and Exhibit hereto annexed: It is thereupon ordered by the Circuit Court of Baltimore City, this 12th day of May, 1927, that the Auditor be and he is hereby ordered, permitted and allowed to allow the sum of five hundred dollars, in his account to Rebecca Hawkins for services rendered Amanda Watts, during her sickness and last illness, Subject to exceptions.

H. Arthur Plump

Double Probate---Notary.

State of Maryland, Baltimore City, To wit:

On this 12th. day of ^may, A. D. 1927, before me the subscriber, a Notary Public of the State of Maryland, in and for Baltimore City, personally appeared, Rebecca Hawkins and made oath in due form of law that she believes and knows that the services were rendered as charged in the annexed account, that they were bona fide delivered or performed as charged and that the said Rebecca Hawkins has not received any payments or satisfaction for services therein charged more than credit is duly given for and appearing on the said account.; nor has she received any security for the same; and that the amount claimed is justly due according to the best of her knowledge and belief.

AND ON THE SAME DAY, this 12th. day of May, A.D. 1927, also appeared, Annie Carrington and made oath in due form of law, that the services were rendered by the aforesaid Rebecca Hawkins for Amanda Watts, deceased, as charged in the "ANNEXED ACCOUNT", and at the price charged in the "ANNEXED ACCOUNT" and that Amanda Watts promised to pay the same, And no part of which has been paid the said Rebecca Watts.

WITNESS my hand and Official Seal.

U. Grant Tyler

Notary Public.

IN THE CIRCUIT COURT OF BALTIMORE CITY

GEORGE W? EVANS, TRUSTEE.
~~And~~

To Rebecca Hawkins, DR:

To services rendered to Amanda Watts, deceased
in her life time at her instance and request;

At 333 Camel Street, Baltimore City

For six years or 312 weeks at \$1.61 per. week----- \$500.00

Received Payment,

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

~~633~~
1926 A

JOHN C.KING, et al,

VS.

EMMA HOWARD, et al

answer to writ order

Mr. Clerk:-

Please file.

George Jones
ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

H. H. May 1927

JOHN C.KING et al : IN THE CIRCUIT COURT

VS. : OF

EMMA HOWARD, et al : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of George W. Evans, Trustee to the claim of Jennie Palmer, respectfully says:

That he has no knowledge as to the merits of the claim as set out in the petition and that he can neither admit nor deny the merits but that he will allow same in his account subject to the usual exceptions.

George W. Evans
L trustee

#v
IN THE CIRCUIT COURT OF

BALTIMORE CITY.

633
1926 A

JOHN C. KING et al,

VS.

EMMA HOWARD' et al

Report of Sale

Mr. Clerk:-

Please file.

George Evans

ATTORNEYS for PLAINTIFFS

Trustee
214633

(20) (20)

DAVIS & EVANS

ATTORNEYS AT LAW

7d. 24" May 1927

JOHN C.KING et al

:

IN THE CIRCUIT COURT

VS.

:

OF

EMMA HOWARD, et al

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

George W. Evans, Trustee in the above entitled cause, respectfully says:

That the property, 333 Camel St., (formerly called Rose Street) was sold at public auction, Monday May 9, 1927 to Charles H. McConnell at and for the sum of eleven hundred (\$1100) dollars, he being the highest bidder therefor.

WHEREFORE your petitioner prays that the sale be ratified.

George W. Evans
Trustee

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this 23rd day of May, in the year one thousand nine hundred and twenty seven, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City aforesaid, personally appeared George W. Evans and made oath in due form of law that the matters and facts in the foregoing report are true to the best of his knowledge and belief.

AS WITNESS my hand and Notarial Seal.


Walter C. Fisher

NOTARY PUBLIC.

~~Ordered by the Court this day of 1927
that the sale to Charles H. McConnell be and the same is hereby
ratified.~~

633
~~1920~~

9 No.

Ct. Ct.

Docket

Kingston
vs.
Borrad, et al

ORDER NISI ON REPORT OF SALES

9 No. 14633

(21)

(21)

Filed 24th May 1921

[Order Nisi]

John C. King,
et al,
 vs.
Emma Howard,
et al

IN THE
Circuit Court
 OF
 BALTIMORE CITY

ORDERED, by the Circuit Court of Baltimore City this *24th* day
 of *May* 192*7* that the _____ Sale of the
 property mentioned in these proceedings, made and reported by
George W. Evans.

Trustee,

be RATIFIED AND CONFIRMED, unless cause to the contrary thereof be shown on or
 before the *24th* day of *June* 192*7*. Provided, a copy of
 this order be inserted in some daily newspaper printed in Baltimore City, once in each of
 three successive weeks, before the *17th* day of *June* 192*7*.

The Report states the amount of _____ sale to be
 \$ *1100* x x

Chas. R. Whiteford
Clerk.

True Copy.

Test: _____ Clerk.

633
192.69

Docket No.....

King

vs.

Ronald

et al.

Certificate of Publication

414633

22

(22)

THE DAILY RECORD

Filed 25th day of June 1927

THE DAILY RECORD

Davis & Evans, Solicitors,
215 St. Paul Place.

IN THE CIRCUIT COURT OF BALTIMORE CITY—(A—633—1926)—John C. King et al. vs. Emma Howard et al.

Ordered by the Circuit Court of Baltimore City, this 24th day of May, 1927, that the sale of the property mentioned in these proceedings, made and reported by GEORGE W. EVANS, trustee, be ratified and confirmed, unless cause to the contrary thereof be shown on or before the 24th day of June, 1927; provided, a copy of this order be inserted in some daily newspaper printed in Baltimore City, once in each of three successive weeks, before the 17th day of June, 1927.

The report states the amount of sale to be \$1,100.

CHAS. R. WHITEFORD, Clerk.

True Copy—Test:

CHAS. R. WHITEFORD, Clerk.

Special Public Auction Sale 2 BALTIMORE

Baltimore, *June 8th*, 1927

We hereby certify that the annexed advertisement of Order *Misc* Circuit Court

of Baltimore City, Case of

John C. King et al.
vs. *Emma Howard et al.*

was published in THE DAILY RECORD, a daily newspaper published in the City of Baltimore, once in each of

three successive weeks before the *17th* day of *June*, 1927

First insertion *May 25th*, 1927

THE DAILY RECORD

Per *C. Watkins*

20 June

CIRCUIT COURT

633
1976

a No.

Docket

King et al.

vs.

Bohrat et al.

Final Order of Ratification on
Trustee's Report of Sale.

Order _____ day of _____ 19

a No. 14633

23

(203)

Filed 25th day of June 1977

John B. King
et al
vs.
Emma Borrad
et al

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

May Term, 1927

ORDERED BY THE COURT, This 25th

day of June 19 27 that the sale made and reported by the

Trustee on May 24, 1927

aforesaid be and the same hereby finally Ratified and Confirmed, no cause to the contrary having been shown, although due notice appears to have been given as required by the Order Nisi passed in said cause; and the Trustee allowed the usual commissions and such proper expenses as he shall produce vouchers for to the Auditor.

H. Arthur Stamp

Done on
Geo. W. Evans,
Justice

633
6/30/27

IN THE CIRCUIT COURT
-OF-
-- BALTIMORE CITY

JOSEPH C KING, and
ELLANORA KING, his wife
and JOHN C. KING

VS.

EMMA HOWARD
BLANCHE KING

Petition. & Order
(4)

a14633
MR: CLERK:
(54)

Please file &c.,
Roy S. Bond
Roy S. Bond
Sols. for Petitioner.

24
ROY S. BOND
ATTORNEY AT LAW
220 ST. PAUL PLACE
BALTIMORE, MD.

FILED 13 July 1927



Copy of the within Petition and Order of Court, served on
George W. Evans, Justice on the 15th day of July, 1927,
in the presence of Adam S. Buck. John E. Lotze Sheriff
Geo. W. Evans

JOSEPH C. KING and
ELLANORA KING, his wife
and JOHN C. KING

IN THE

VS.

CIRCUIT COURT OF-----

EMMA HOWARD
BLANCHE KING

BALTIMORE CITY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

The Petition of- JOSEPH SIMMS- respectfully sets forth as follows:

(1) That Amanda Watts, his half sister died intestate, on or about the -8th- day of September, 1926, seized and possessed of fee simple property, situate in Baltimore City, and designated as - 333 Rose Street.

(2). That by decree of this Honorable Court, passed on the 5th day of April, 1927, George W. Evans, Esquire, was appointed trustee to make sale of said fee simple property, and to distribute proceeds among those legally entitled thereto.

(3). That Joseph Simms, your Petitioner, is a half brother of the decedent, Amanda Watts, and a legal heir and next of kin.

WHEREFORE YOUR PETITIONER PRAYS:

That Joseph Simms be made a party- defendant, and requiring the said George W. Evans, trustee, to show cause, why your petitioner should not be given his lawful distributive share.

-b- Such other and further relief as the case may require.

AS IN DUTY BOUND, etc.,

Joseph Jimmy
Petitioner.

Paul B. M. -
Arthur C. Biscoe
Solicitors for Petitioner.

STATE OF MARYLAND
BALTIMORE CITY to wit-

I HEREBY CERTIFY that on this ^{11th} day of July, 1927, personally appeared before me, the subscriber, a Notary Public, of the State of Maryland, in and for Baltimore City- Joseph Jimmy and made oath in due form of law that the matter and facts set forth in this, his Petition are true to the best of his knowledge and belief.

AS WITNESS MY HAND AND Notarial Seal.

Clarence J. W. [unclear]
NOTARY PUBLIC.



JOSEPH C. KING and
ELLANORA KING, his wife
and JOHN C. KING

----- IN THE

VS.

-- CIRCUIT COURT OF --

EMMA HOWARD
BLANCHE KING

BALTIMORE CITY.

--O R D E R--

UPON THE AFOREGOING PETITION AND AFFADAVIT, it
is this ^{13th} day of July, 1927, ordered by the Circuit Court of
Baltimore City, that the said Joseph Simms, the Petitioner, be,
and he is hereby made a party defendant in these proceedings, and
the said George W. Evans, Trustee, is hereby ordered to show cause
on or before the ^{13th} day of ^{July} 1927, why the said pe-
titioner should not be given his lawful distributive share, provided
a copy of this order be served on the said George W. Evans, Trustee,
on or before the ^{19th} day of ^{July} 1927.

H. Arthur Stump

633
1926

Docket No.....

King,
Irae

vs.

Ronald,
Irae

Certificate of Publication

214633

(25)

THE DAILY RECORD

Filed 13th day of July 1926

THE DAILY RECORD

Davis & Evans, Solicitors,
215 St. Paul Place.

IN THE CIRCUIT COURT OF BALTI-
MORE CITY—(A—633—1926)—Joseph C.
King et al. vs. Emma Howard et al.

Ordered by the Court this 12th day of
April, 1927, that GEORGE W. EVANS,
the trustee in the above entitled cause
named, give notice to all persons having
claims against RICHARD WATTS or
AMANDA WATTS, late of 333 Camel street,
formerly Rose street, to file their claims
properly authenticated with the Clerk of
the Circuit Court of Baltimore City, on or
before the 12th day of July, 1927, by
causing a copy of this order to be pub-
lished in some daily newspaper in Balti-
more City, once a week for three suc-
cessive weeks, before the 12th day of May,
1927.

H. ARTHUR STUMP.

True Copy—Test:

ap13,30,27

CHAS. R. WHITEFORD,
Clerk.

12 July

Baltimore, *April 27th*, 1927

We hereby certify that the annexed advertise-
ment of Order.....Circuit Court

.....of Baltimore City, Case of

Joseph King et al.
vs. *Emma Howard et al.*

was published in THE DAILY RECORD, a daily news-
paper published in the City of Baltimore, once in each of
.....*three*.....successive weeks before the

.....*12th* day of *May*, 1927

First insertion *April 13th*, 1927

THE DAILY RECORD

Per *C. Watkins*

IN THE CIRCUIT COURT OF

BALTIMORE CITY

633
1926

66A

JOHN C. KING et al

VS.

EMMA HOWARD, et al

Trustees
RESPONDENT'S ANSWER.
to petition of
Joseph Simms

Mr. Clerk:-

Please file.

George Evans
ATTORNEYS FOR RESPONDENT

214633

26

(26)

DAVIS & EVANS
ATTORNEYS AT LAW

St. 19 July 1927

JOHN C.KING, et al

:

IN THE CIRCUIT COURT

VS.

:

OF

EMMA HOWARD, et al

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of George W. Evans, Trustee, to the petition of Joseph Simms, in the above entitled cause exhibited, respectfully says:-

1. That he has no personal knowledge of the relationship of Joseph Simms, save that which he has received from relatives-, hence he neither admits nor denies that part of paragraph one of the petition alleging relationship, but demands proof thereof. And further answering said paragraph, your Respondent admits that part setting forth the death and alleging ownership of property 333 Rose Street.
2. That your respondent admits the second paragraph of the petition.
3. Your respondent neither admits nor denies the relationship of the petitioner but demands strict proof thereof.


Wherefore your respondent prays that the petition be dismissed.


TRUSTEE

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this 18th day of July, in the year nineteen hundred and twenty seven, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City aforesaid, personally appeared George W. Evans, Trustee and made oath in due form of law that the matters and facts in the foregoing answer are true as therein stated.

AS WITNESS my hand and Notarial Seal.


Helew C. Fisher
NOTARY PUBLIC

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

633
1926 H66

JOHN C.KING et al

VS.

EMMA HOWARD, et al

Exceptions To
Claim of Jennie
Palmer

Mr. Clerk:-

Please file.

at H633
Stewart & Evans

ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

St. 30th July 1927

JOHN C.KING, et al

IN THE CIRCUIT COURT

VS.

OF

EMMA HOWARD, et al

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

John C.King, plaintiff in the above entitled cause
" excepts to the allowance of the claim of Jennie Palmer for
services etc., saying:

1. That the services were never performed as alleged.
2. That there was no agreement to pay for any service
that might have been rendered.
3. And for other reasons to be disclosed at the hearing
of ^{THESE} ~~the~~ exceptions.

WHEREFORE ^{The Plaintiff} ~~your respondent~~ prays that the petition be
dismissed.

X John C. King

Stewart Davis
ATTORNEY FOR PLAINTIFF

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this 26th day of July, in the year
nineteen hundred and twenty seven, before me, the subscriber a
Notary Public of the State of Maryland, in and for the City afore-
said personally appeared John C.King and made oath in due form of
law that the matters and facts in the foregoing answer are true
as therein stated.

Helena C. Fisher
NOTARY PUBLIC

IN THE CIRCUIT COURT OF
BALTIMORE CITY

633
1926 A66

JOHN C. KING et al

VS.

EMMA HOWARD, et al

~~RESPONDENTS ANSWER~~

Exceptions to Claim of
Rebecca Hawkins

Mr. Clerk:-

Please file.

I. Stewart Davis

ATTORNEY FOR RESPONDENT

Plaintiff

at 4633

28 287

DAVIS & EVANS

ATTORNEYS AT LAW

St. 30" July 1927

JOHN C.KING et al

IN THE CIRCUIT COURT

VS.

OF

EMMA HOWARD, et al

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

John C.King, plaintiff in the above cause, "Except, to the allowance of the claim of Rebecca Hawkins in the above entitled cause exhibited, says:

1. That there never was any such service rendered by the claimant.
2. That there never was any agreement between the deceased and Rebecca Hawkins for compensation for work or any other service that might have been performed and had there been such an agreement part of the claim is outlawed.
3. And for other reasons to be disclosed at the hearing of these exceptions.

WHEREFORE ^{the plaintiff} ~~your respondent~~ prays that the petition be dismissed.

x John C. King
RESPONDENT

Steward Davis
ATTORNEYS FOR RESPONDENT
plaintiff

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this 26th day of July, in the year nineteen hundred and twenty seven, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City aforesaid, personally appeared John C.King and made oath in due form of law that the matters and facts in the foregoing answer are true.

Heleen C. Fisher
NOTARY PUBLIC

Stewart Davis

66A

Ct. Ct.

1927

No. *633* Docket

Joseph C King

vs.

Emma Howard

MOTION FOR HEARING

a No. *4633*
59

Filed *5th* day of *August* 1927

Henry M. Daniel
W. Frank Lyden
Edw. B. Snyder
Roy C. Brown
Arthur E. Quisenberry

Joseph C. King et al

vs.

Emma Howard et al

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The *plaintiffs* by *J Stewart Davis*

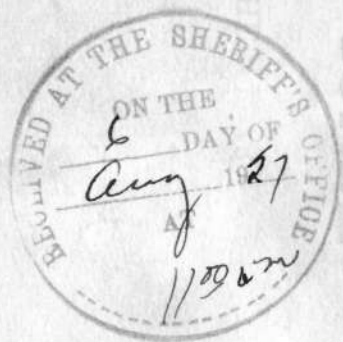
Solicitor, applies to have the above entitled cause placed on the Trial Calendar
for hearing *on exceptions to allowance of claims of*
Jennie Palmer and Rebecca Hawkins and to the
petition of Joseph Simms

in conformity with the First Equity Rule.

[Signature]
Solicitor for *plaintiffs*

Serve on

H. M. Daniels ✓ 109 E Pleasant St
U. G. Tyler ✓ 14 E Pleasant St
E. B. Lowndes 1009 Calvert Bldg
R. S. Bond ✓ 270 W Park St
A. E. Briscoe 14 E Pleasant St



Ct. Ct.

633
192 6 No. A-66 Docket

King, et al

vs.

Howard, et al
1009 Calvert Bldg

NOTICE OF HEARING

~~A-No. 14633~~

~~(30)~~

~~No.~~

~~Filed 5 day of Aug 1927~~

12

Copies of the within Notices served on Harry M Daniels,
W. Grant Tyler, Edward B Lowndes, Roy S. Bond and
Arthur E. Briscoe on the 19th day of August 1927
in the presence of William Bayer.

John E. Potee
Sheriff

Geo #375

Joseph C. King, et al

vs

Emma Howard, et al

IN THE

CIRCUIT COURT

OF BALTIMORE CITY

Upon application made by the Solicitor for the

Plaintiffs

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 exceptions to allowance of claims of Jennie Palmer and Rebecca Hawkins, and to the petition of Joseph Simms

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

633 Ct. Ct.
1976 a Docket

King et al.

vs.

Howard et al.

SUMMONS FOR WITNESSES

a No. ~~14633~~

Filed 15th day of July, 1978

IN THE CIRCUIT COURT OF BALTIMORE CITY
FEB 17 1978 3 27
THE CLERK OF THE COURT

[Faint, illegible handwritten notes on the right page]

IN THE CIRCUIT COURT OF BALTIMORE CITY

Term, 19

Monday The Sheriff will please summon the following witnesses, returnable ~~Monday~~ *February 16*, 1928 at 10 A. M.

JOHN C. KING, et al

vs.

EMMA HOWARD, et al

) IN THE CIRCUIT COURT

) of

) BALTIMORE CITY

Mr. Clerk:

Please issue summons for the following witnesses to testify for Jennie Palmer, claimant, in the above captioned case, which is set for trial on February ~~16~~ *20* 1928, at 10 A.M.

WITNESSES

- sd*
10 Dr. A. Lee Ellis 924 Madison Avenue
- sd*
10 Daisy Brown (colored) 1007 Linden Avenue
- sd*
10 Lily Locks (colored) 328 Camel Street

Edward B. Lowndes
Attorney for Jennie Palmer

to testify for *Claimant Jennie Palmer,*
in the case of *King et al.*
vs. *Howard et al.*
Chas. R. Whiteford.
CLERK OF CIRCUIT COURT OF BALTIMORE CITY

#✓
IN THE CIRCUIT COURT OF

BALTIMORE CITY

633

1926

66 A

JOHN C. KING et al

VS.

EMMA HOWARD, et al

Mr. Clerk:

Please file.

9/14/33

[327]

2029

DAVIS & EVANS
ATTORNEYS AT LAW

John C. King
January 1928

JOHN C.KING, et al

:

IN THE CIRCUIT COURT

VS.

:

OF

EMMA HOWARD, et al

:

BALTIMORE CITY

This case coming up for hearing on petitions and exceptions, testimony was taken and counsel for the respective parties were heard, it is thereupon this 2/5/28 day of February, 1928, ordered that the petition of Rebecca Hawkins be and the same is hereby dismissed and her claim disallowed.

It is further ordered that Jennie Palmer be and she is hereby allowed the sum of one hundred and fifty (\$150.00) dollars for services rendered to Amanda Watts, deceased and that the Trustee allow the same in his account.

It is further ordered that Joseph Simms be, and he is hereby made party defendant as one of the heirs at law of Amanda Watts, deceased, and that George W. Evans, Trustee be and he is hereby ordered to allow the said Joseph Simms ^{such} a distributive share as ^a half brother. *would be legally entitled to*

George W. Evans

73
IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

A 633 - 1926

JOHN C. KING
et al

vs.

EMMA HOWARD
et al

AUDITORS REPORT & ACCOUNT

Order Nisi *13 June* 1928

Final Order *25 June* 1928

W/4633

Filed *13 June* 1928

TRUST ESTATE OF AMANDA WATTS, DECEASED
IN ACCOUNT WITH
GEORGE W. EVANS, ESQ. TRUSTEE

Cr.

By amount of sale of No. 333 Camel Street
(formerly called Rose Street) as per Trustees
Report of Sale filed May 24, 1927 \$1,100.00

" these amounts collected by the Trustee and
reported to the Auditor

viz.

Insurance Gallilean Fisherman	\$50.00	
Interest	50.08	
Rents net	121.63	
State & City Taxes & Water Rent 1927	27.97	
	<u>249.68</u>	1,349.68

Dr.

To the Trustee for his commissions

viz.

On amount of sale per supra	\$84.00	
" " " collections per supra @ 5%	<u>12.48</u>	\$96.48

" the Trustee for his costs of suit

viz.

Solicitor for plaintiffs	10.00	
Clerk for copy	56.45	
" "	.50	
" for 5 releases	<u>6.25</u>	63.20
Sheriff	7.25	
Bond of Trustee	20.00	
Order of Publication	37.35	
Examiner	15.00	
Auditor & Master	22.50	
Notice to creditors	6.00	
Order Nisi	6.00	
Solicitor for defendants	10.00	
Auditor & Notices	<u>28.00</u>	225.30

" the Trustee for his disbursements as per his
vouchers

viz.

Sam W. Pattison & Co., Auctioneers	22.00	
Advertising sale in The Sun	12.60	
" " " Daily Record	36.21	
Repairs	3.96	
Plaintiffs Exhibit A	3.25	
Affidavits	<u>1.50</u>	79.52

" amount forwarded 401.30

To	amount forwarded		\$401.30
"	Jennie Palmer for her services to the deceased Amanda Wallis as per Order of Court of February 1, 1928 Edward B. Lowndes, Atty. 1009 Calvert Bldg.		150.00
"	this Balance for distribution	\$798.38	
	Less collateral inheritance tax @ 5%	<u>39.92</u>	758.46
"	Register of Wills of Baltimore City for above collateral inheritance tax		<u>39.92</u>
			<u>1,349.68</u>

Distribution Account

Cr.

By	Balance for distribution		\$758.46
----	--------------------------	--	----------

Dr.

1	Joseph Simms	2/6		\$252.82
2	John King, Jr.	2/6	\$252.82	
	Less dower interest, Blanche King, his wife			
	08163%		<u>20.64</u>	232.18
3	Blanche King for above dower interest			20.64
4	Joseph King	1/6		126.41
5	Emma Howard	1/6		<u>126.41</u>
				758.46

IN THE CIRCUIT COURT OF BALTIMORE CITY.

Ordered by the Court this *13th* day of June 1928,
that the foregoing Report and Account of the Auditor be ratified
and confirmed as stated and reported unless cause to the contrary
be shown within ten days of this date.

Chas R. Whiteford
Clerk.

IN THE CIRCUIT COURT OF BALTIMORE CITY.

Ordered by the Court this *25th* day of June 1928,
that the foregoing Report and Account of the Auditor be and
the same is hereby finally ratified and confirmed, no cause to
the contrary having been shown and that the Trustee apply the
proceeds accordingly with a due proportion of interest as the
same has been or may be received.

Hyman P. Duane
Judge.