

IN THE CIRCUIT COURT OF
BALTIMORE CITY

*B 5-2
1927*

LAURA CARROLL

VS.

FRANK CARROLL

614 W Hoffman St

BILL FOR DIVORCE

B 3/4/28

Mr. Clerk:-

Please file.

Davis & Evans
ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

Filed 2 Feb 1927

TO THE END, THEREFORE:

- (a) That your Oratrix may be divorced A Vinculo Matrimonii
from the said Frank Carroll,
(b) Custody of minor child.
(c) That she may have such other and further relief as
her case may require.

May it please your Honor to grant unto your Oratrix
the Writ of Subpoena directed against the said Frank Carroll,
commanding and requiring him 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.



SOLICITORS FOR COMPLAINANT.

LAURA CARROLL : IN THE CIRCUIT COURT

VS. : OF

FRANK CARROLL : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, Frank Carroll on the 15th day of April, 1912 and with whom she resided until the 15th day of September, 1919, when the defendant deserted the plaintiff.
2. That though the conduct of your Oratrix toward the said Frank Carroll has always been kind, affectionate and above reproach, he has, without any just cause or reason, abandoned and deserted her and has declared his intentions to live with her no longer, and that such abandonment has continued uninterruptedly for more than three years and is deliberate and final and the separation of the parties is beyond any reasonable hope of reconciliation.
3. That your Oratrix has not lived or co-habited with the said defendant since said desertion.
4. That there is one child, born as result of said marriage, James, age fifteen years.
5. That both your Oratrix and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this Bill of Complaint.

P13

Ct. Ct.

B-52

192 7

Docket No.

Laura Carroll

vs.

Frank Carroll

614 W Hoffman

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pro

No. B-31458

(2)

Filed 11 Feb, 1927

Davis & Evans

SOLICITOR

10

Summoned and a copy of the process left with the defendant

*Bisby
2/8/27*

*John C. Potts
Sheriff*

Fees \$0.80

FEB 2 1927 3 18 PM

RECEIVED AT THE SHERIFFS OFFICE ON

EQUITY SUBPOENA

The State of Maryland

On Frank Carroll
614 W. Hoffman Street

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you do within the time limited by law, beginning on the second Monday of February next cause an appearance to be entered for you and your answer to be filed to the complaint of

Laura Carroll

against you exhibited in the Circuit Court of Baltimore City, HEREOF fail not, as you will answer the contrary at your peril.

WITNESS, the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the 10th day of January 1927 Issued the 2nd day of February, in the year 1927

Handwritten signature of 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.

B52

Ct. Ct.

192 7

Docket

Laura Carroll

vs.

Frank Carroll

Decree Pro Confesso.

~~Worship~~

B31458
(3)

No.

Filed 21st March 1927

3/13/15/27

U.S. Circuit Court

Circuit Court

Sept. 1927

LINEN JUDGE

Laura Carroll

vs.

Frank Carroll

IN THE
Circuit Court
OF
BALTIMORE CITY.

March Term, 1927

The Defendant having been duly summoned (~~notified by Order of Publication~~) to appear to the Bill of Complaint, and having failed to appear thereto, according to the exigency of the writ, (~~said Order~~).

It is thereupon this 21st day of March in the year nineteen hundred and twenty seven by the Circuit Court of Baltimore City, ADJUDGED, ORDERED and DECREED, that the complainant is entitled to relief in the premises, and that the bill of Complaint be and is hereby taken pro confesso against the defendant. But because it doth not certainly appear to what relief the Plaintiff is entitled, it is further *Adjudged*, and *Ordered*, that one of the Examiners of this Court, take testimony to support the allegations of the bill.

James P. Forter

Testimony taken at the office of George Arnold Frick, Examiner, on Monday March 28, 1927 at 3 P.M.

Present: G. Stewart Davis - Counsel for Plaintiff.

Thereupon:

LAURA CARROLL, the Plaintiff,
produced as a witness on her own behalf, being
first duly sworn, deposes and saith as follows -
that is to say -

BY THE EXAMINER: -

1 Q- State your name, residence, and occupation?

A- Laura Carroll, 1132 Stockton Street, laundry.

2 Q- Are you the Plaintiff in this case?

A- Yes sir.

3 Q- How long have you known the Defendant, your husband?

A- About seventeen years.

BY MR. DAVIS: -

4 Q- When, where, and by whom were you married?

A- 15th of April 1912, in Baltimore City, by Reverend Julius Gray.

5 Q- How long have you been a resident of Baltimore City, State of Maryland prior to the filing of this Bill of Complaint?

Laura Carroll.

A- Since 1918, continuously.

6 Q- Were there any children born as a result of this marriage?

A- One.

7 Q- What is its name and age?

A- James Carroll, fifteen now.

8 Q- Are you and your husband now living together?

A- No sir.

9 Q- When did you separate?

A- 15th of September 1919.

10 Q- Which left the other?

A- He left me.

11 Q- Did you give your husband any just cause or reason to leave you?

A- No, - I was away at work, and he sold me out.

12 Q- Just what do you mean by that?

A- He sold everything I had in the house and when I came back from work he was gone.

13 Q- Were you always a good, kind, faithful and affectionate wife?

A- Yes.

14 Q- Has this abandonment and desertion continued uninterruptedly since September 15, 1919?

A- Yes sir.

15 Q- Was the abandonment and desertion of you his own deliberate and final act?

Laura Carroll.

A- Yes sir.

16 Q- Is there any reasonable hope or expectation of a reconciliation between you and your husband now?

A- No sir.

17 Q- Who has the care and custody of this child, James Carroll?

A- I.

18 Q- Do you desire to continue to have his care and custody?

A- Yes.

19 Q- How much do you desire the court to award you as support and maintenance of this child?

A- He was under an order of the Criminal Court to pay Three Dollars a week which he neglected to pay. I would like to have Three Dollars a week now.

20 Q- Will you be able to properly provide for and maintain this child with the help of Three Dollars a week from your husband?

A- Yes sir.

QUESTION BY THE EXAMINER:

Do you know or can you state any other matter or thing that may be of benefit or advantage to 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.

Answer:

A handwritten signature in cursive script, appearing to be the initials 'L.C.' or similar, written in dark ink.

Laura Carroll

CHARLOTTE RANDALL, produced as a witness on the behalf of the Plaintiff, being first duly sworn, deposeseth and saith as follows - that is to say

BY THE EXAMINER: -

1 Q- State your name, residence, and occupation?

A- Charlotte Randall, 1132 Stockton Street, cook-
maid.

2 Q- Do you know the parties to this suit?

A- Yes, the Plaintiff is my sister, and the
Defendant is my brother-in-law.

BY MR. DAVIS: -

3 Q- Were you present at the marriage of these
parties?

A- No sir.

4 Q- Did they live together as man and wife, and
were they so recognized in the community in which
they lived, and did they hold themselves out as a
married couple?

A- Yes sir.

5 Q- How long has your sister been a resident of
the City of Baltimore, State of Maryland?

A- Ever since 1918.

6 Q- Were there any children born as a result of
this marriage?

A- One.

Charlotte Randall.

7 Q- State his name and age?

A- James Carroll, age fifteen.

8 Q- Are Mr. and Mrs. Carroll, the parties to this suit, now living together?

A- No sir.

9 Q- When did they separate?

A- 1919, - September 15th.

10 Q- Which left the other?

A- He left her.

11 Q- Do you know the circumstances surrounding his abandonment and desertion of her?

A- He sold out all the furniture in the house and left.

12 Q- Did Mr. Carroll have any just cause or reason to leave his wife?

A- No sir.

13 Q- Has this abandonment and desertion by Mr. Carroll of his wife continued uninterruptedly since September 15, 1919?

A- Yes sir.

14 Q- Was it his deliberate and final act in leaving his wife?

A- Yes sir.

15 Q- Is there any reasonable hope or expectation of a reconciliation between the parties?

A- No sir.

Charlotte Randall.

16 Q- Is Mrs. Carroll in your opinion a fit and proper person to have the care and custody of this child, James Carroll?

A- Yes sir.

17 Q- Was Mrs. Carroll always a good, kind, faithful and affectionate wife to her husband?

A- She was.

QUESTION BY THE EXAMINER:

Do you know or can you state any other matter or thing that may be of benefit or advantage to 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.

Answer:

No
Charlotte Bondall