

IN THE CIRCUIT COURT OF

BALTIMORE CITY

62 B 419

1908

DOT ALLEN

VS.

MATILDA ALLEN

149 Enow Alley.

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

J. Steward Davis
SOLICITOR FOR COMPLAINANT.

215 St. Paul Place

B 25546

DAVIS & BISHOP
ATTORNEYS AT LAW
BANNEKER BUILDING
14 E. PLEASANT STREET
BALTIMORE

Ad 30 June 1908

DOT ALLEN : IN THE CIRCUIT COURT
VS. : OF
MATILDA ALLEN : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

- (1) That he was married to his wife, Matilda Allen, on or about the 4th day of May, 1916 and lived together as man and wife until on or about the 6th day of May, 1923, when the defendant committed the crime of adultery with divers, lewd and abandoned men in Baltimore City, State of Maryland.
- (2) That your Orator has not condoned the offense, neither has he lived or co-habited with the said defendant since the discovery of his indiscreet actions.
- (3) That there are no children born as result of said marriage.
- (4) That both your Orator and the defendant are residents of Baltimore City, State of Maryland and have been for more than two years prior to the filing of this bill of complaint.
- (5) That the conduct of your Orator has been above reproach in all respects, having been a true and devoted husband to the said Matilda Allen.

WHEREFORE YOUR ORATOR PRAYS:

- (a) A divorce a Vinculo Matrimonii from the defendant and such other and further relief as his case may require.
- (b) May it please your Honor to grant unto your Orator the Writ of Subpoena directed against the said Matilda Allen, 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 as in duty bound, etc.

J. Steward Davis

SOLICITOR FOR COMPLAINANT.

355

419
192 3

163

Ct. Ct.

Docket No.

Mrs Boston
Allen
Tinsdale Hall
Allen
149 Union St

SUBPOENA TO ANSWER BILL OF COMPLAINT

B Pro
No. 255-46

(2)

Filed 9 July 1923
J. J. Lawt SOLICITOR

10

Summoned and a copy of the Process left
with the defendant

(Kelly) 7/9/23 Thomas J. McVerty
Shreff

Fees \$ 0.80

EQUITY SUBPOENA

The State of Maryland

To

Matilda Allen

of Baltimore City, Greeting:

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

Dot Allen

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 *14* day of *May* 192 *3*

Issued the *30* day of *June* in the year 192 *3*

Clara R. Whiteford

Clerk.

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11.)

In the Circuit Court
of Baltimore City.

62 B 419

Dot Allen

vs

1923

Matilda Allen

Answer.

Mr. Clerk:

Please file.

Harry W. Shenton

Calvin Canoy

Solicitors for Respondent.

B 25-546

B

filed July 1923

Dot Allen)
)
 vs.)
)
 Latilda Allen) 63 B - Folio 419

In the
Circuit Court of
Baltimore City.

To the Honorable, the Judge of said Court:

The answer of Latilda Allen, Respondent herein, to the Bill of Complaint filed and exhibited against her herein, respectfully represents unto your Honor:

I.

That she admits such part of paragraph one of said Bill of Complaint as pertains to the date of her marriage to the Complainant herein, but denies the other allegations contained in said first paragraph.

II.

That she neither admits nor denies the allegations contained in paragraph two of said Bill of Complaint, but demands strict proof thereof.

III.

That she admits the allegations contained in paragraphs three and four of said Bill of Complaint.

IV.

That she neither admits nor denies the allegations contained in paragraph five of said Bill of Complaint, but demands strict proof thereof.

Having fully answered said Bill of Complaint, she prays that the same may be hence dismissed with costs.

And as in duty bound, etc.

Harry Shenton
Maloney
Solicitors for Respondent.

Latilda Allen
Respondent.

In the Circuit Court
of Baltimore City.

B 419
Dot Allen

vs

Matilda Allen.

1923

Petition

B 25546

Mr. Clerk:

4
Please file.

Harry W. Shenton

~~John Lawrence~~
Solicitors for Petitioner.

Ed 17 July 1923

Dot Allen) In the
) Circuit Court of
vs.) Baltimore City.
)
Matilda Allen) 63 B - Folio 419.

To the Honorable, the Judge of said Court:

The petition of Matilda Allen, the defendant in the above entitled cause, respectfully shows:

1. That the plaintiff has filed his Bill of Complaint in this Court for a divorce a vinculo matrimonii from your petitioner on the ground of adultery, as will appear by reference to said Bill of Complaint in this cause.

2. That your petitioner altogether denies said charge, and affirms that when said cause comes on to be heard, it will be seen by the Court that said charge is entirely destitute of foundation.

3. That while denying that she has committed the crime of adultery, as alleged in said Bill of Complaint, your petitioner admits it to be true that said Plaintiff has not, for the past several months lived with her, although the cause of such separation has not been due to any act of your petitioner.

4. That your petitioner is advised that she is entitled to have an order passed by this Court requiring the Plaintiff to pay her a reasonable and proper sum for alimony pendente lite for her personal support, and also a reasonable and proper sum to enable her to defray the necessary expenses of her defence to said Bill, and to compensate the counsel whom she has employed to defend the said suit.

5. That the Plaintiff conducts a paper hanging business and earns at least Fifty Dollars a week, and that, in view of the means of the Plaintiff and of the serious charge against your petitioner, she is entitled to a liberal allowance to be made to her for her defence; and the amount of her alimony pendente lite should also be fixed according to the Plaintiff's means and ability.

Your petitioner therefore prays your Honor to pass an order requiring the said Dot Allen to pay her for alimony pendente lite such a sum, and at such intervals, as to the Court shall seem proper; and also such other sum, as to the Court shall seem proper, to enable your petitioner to defray the expenses to which she will be put in defending said suit, including therein a reasonable fee to her counsel.

And as in duty bound, etc.,

matilda allen
Petitioner.

Henry W. Shenton
John H. Haney
Solicitors for Petitioner.

STATE OF MARYLAND, CITY OF BALTIMORE, to wit:

I hereby certify that on this 12th day of July, 1923, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared Matilda Allen, and she made oath in due form of law that the matters and facts set forth in the foregoing petition are true to the best of her knowledge and belief.

WITNESS my hand and Notarial Seal.

Louisa. Schwartz
Notary Public.

63B Docket 419
1923

Circuit Court

Allen

vs
Allen

Order Counsel Fee and Alimony

Pendente Lite

P 25546
No.

\$50 a week
no arrears

At 18 July 1923
Bry

Thomas F. Mumby
Sheriff

Non est

Dot Allen

vs

Matilda Allen

-IN THE-
CIRCUIT COURT

-OF-

BALTIMORE CITY

July TERM

ORDERED BY THE COURT this 18th day of July 1923

that the Plaintiff Dot Allen

pay to the Defendant Matilda Allen

the sum of Twenty-five Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of Five Dollars per week, during the continuance of this suit, to the said Defendant Matilda Allen

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 2

day of August 1923, provided a copy of this Order be served on the said Plaintiff

Dot Allen on or before the 28

day of July 1923
Robert F. Stanton

TRUE COPY—TEST:

CLERK

Docket.....

Circuit Court

DOE ALLEN

vs.

MATILDA ALLEN

Order Counsel Fee and Alimony

Pendente Lite

No.

—IN THE—
CIRCUIT COURT

—OF—
BALTIMORE CITY

July TERM

Dot Allen

vs.

Matilda Allen

ORDERED BY THE COURT this 18th day of July 1923

that the Plaintiff Dot Allen

pay to the Defendant Matilda Allen

the sum of Twenty-five Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of Fifteen

Dollars per week, during the continuance of this suit, to the said Defendant Matilda Allen

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 2nd

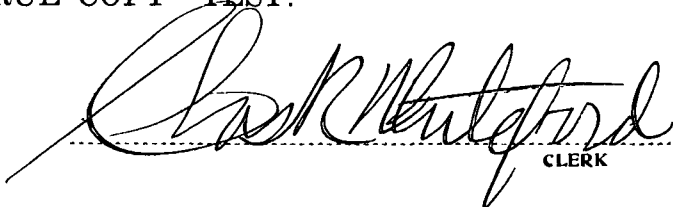
day of August 1923, provided a copy of this Order be served on the said Plaintiff

Dot Allen on or before the 28th

day of July 1923.

Robert F. Stanton

TRUE COPY—TEST:


CLERK

In the Circuit Court
of Baltimore City.

63 B 419
1923

Matilda Allen

vs

Dot Allen.

Cross Bill.

B 255-46

Mr. Clerk (6)
Please file &c.

J. Calvin Curney
Harvey W. Shenton
Solicitors for Complainant.

fd 30 July 1923

Matilda Allen) In the
vs (Circuit Court of
Dot Allen (Baltimore City.
(Docket 63 B - Folio 419

CROSS BILL

To the Honorable, the Judge of said Court:

Your Oratrix, complaining, says:

I

That she was married to the defendant on or about the fourth day of May, nineteen hundred and sixteen, in the City of Baltimore, State of Maryland, by a religious ceremony.

II

That no children have been born as a result of said marriage.

III

That both your oratrix and the said defendant have been residents of Baltimore City, in the State of Maryland, for more than two years last past.

IV

That the conduct of your oratrix toward said defendant has always been kind, chaste, affectionate and above reproach.

V

That said defendant has committed the crime of adultery with sundry lewd and abandoned women in Baltimore City and elsewhere in the State of Maryland prior to the filing of this Bill of Complaint, which offences your oratrix has not condoned.

To the end, therefore,

1. That your oratrix may be divorced a vinculo matrimonii from the defendant.

2. That your oratrix may have such other and further relief as the nature of her case may require.

May it please your Honor to grant unto your oratrix the State's Writ of Subpoena, directed to said Dot Allen, living and residing in Baltimore, City, State of Maryland, commanding him to be and appear in this Court on some certain day to be named therein to answer the premises and abide by and perform such decrees as may be passed herein.

And as in duty bound, etc.,

Matilda allen
Complainant

John Rainey
Henry Stenton
Solicitors for Complainant.

397-427

419 B 63

Ct. Ct.

192 3

Docket No.

Allen

Allen

SUBPOENA TO ANSWER BILL OF COMPLAINT

B 25546

No.

(7) (10)

Filed: 13 Aug 1923

11 Sept
H. C. Carney SOLICITOR

B

Now Est

Thomas J. McQuilly
Shuff

120 3

REISSUED TO ~~Sept 10~~ RETURN DAY, 1923

Chas R. Whiteford

Clerk

Now Est

Thomas J. McQuilly
Shuff

EQUITY SUBPOENA

The State of Maryland

On

Not Allen

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 ~~August~~ ^{next} *Cross Bill of* cause an appearance to be entered for you and your answer to be filed to the complaint of

Matilda Allen

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 **9th** day of **July** 192**3**

Issued the *30* day of ~~August~~ *July*, in the year 192**3**

Chas. R. Whiteford, Clerk.

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11.)

Ct. Ct.

192

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed.....192

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

To

Mat Allen

La

8/20 3
September
Chas. R. Whiteford

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

Matilda Allen

against you exhibited in the Circuit Court of Baltimore City,

HEREOF fail not, as you will answer the contrary at your peril:

WITNESS, the Honorablē JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the *9th* day of *July* 192*3*

Issued the *30* day of ~~August~~ *July*, in the year 192 *3*

Chas. R. Whiteford, Clerk.

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11.)

IN THE CIRCUIT COURT OF

BALTIMORE CITY

B 419
DOT ALLEN *1923*

VS.

MATILDA ALLEN

(Cross Bill)

MATILDA ALLEN

VS.

DOT ALLEN

RESPONDENT'S ANSWER
TO CROSS-BILL.

Mr. Clerk:-

Please file.

B 25546
J. Steward Davis

Attorney for respondent in
Cross Bill.

D.S. DAVIS & BISHOP
ATTORNEYS AT LAW
BANKERS BUILDING
100 PLEASANT STREET
BALTIMORE, MD.
215 St. Paul Place


DOT ALLEN : IN THE CIRCUIT COURT
VS. :
MATILDA ALLEN : OF
MATILDA ALLEN :
VS. : BALTIMORE CITY
DOT ALLEN :

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of the respondent in the Cross Bill of the above case exhibited is as follows:

- (1) He admits the statements contained in the first paragraph of the Complainant's Bill.
- (2) He admits the statements contained in the second paragraph of the Complainant's Bill.
- (3) He admits the statements contained in the third paragraph of the complainant's Bill.
- (4) He admits the statements contained in the fourth paragraph of the Complainant's Bill.
- (5) He neither admits nor denies the fifth paragraph of the Complainant's Bill.

WHEREFORE the respondent prays that the Complainant's Cross Bill be dismissed.



Attorney for Respondent in Cross Bill.

63/B
419

CIRCUIT COURT

419
19 vs

163

Docket No.

Matilda Allen

vs.

Hot Allen

Order

19

Strike

Petition for leave to take
Testimony and Order
of Court thereon.

B 25546

No.

Rule (9)

Fd 31 July 19 23

Marteda Allen
vs.
Hot Allen

IN THE
Circuit Court
OF
BALTIMORE CITY

To the Honorable the Judge of the
Circuit Court of Baltimore City:

THE PETITION OF Marteda Allen

in this case, respectfully shows that she desires to take testimony in this case, and respectfully prays that leave be granted her to do so before one of the Standing Examiners of this Court.

Alphabany
Hampton
Solicitors for Complainant

ORDERED, this 31 day of July 1923, that leave be granted to the parties to the cause, to take testimony, as prayed, before any one of the Standing Examiners of this Court.

Carroll J. Bond

CIRCUIT COURT

19 ⁴¹⁹/₂₃

Docket No. 6313

Allen

vs.

Allen

Order

19

Petition for leave to take
Testimony and Order
of Court thereon.

[Signature]
No. B 25546

< 11 >

Fd 25 Sept

1923

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Bob Allen

vs.

Martina Allen

IN THE
Circuit Court
OF
BALTIMORE CITY

To the Honorable the Judge of the
Circuit Court of Baltimore City:

THE PETITION OF *plaintiff*

in this case, respectfully shows that *he* desire *S* to take testimony in this case, and respectfully pray *S* that leave be granted *him* to do so before one of the Standing Examiners of this Court.

Tom Jam
Solicitor for

ORDERED, this *25th* day of *September* 19*23*, that leave be granted to the parties to the cause, to take testimony, as prayed, before any one of the Standing Examiners of this Court.

Henry Duffin