

In the Circuit Court
B 986
1925 of
Baltimore City

Luethide Frazer

vs

Harold E. Frazer
1836 Division St
or
1014 Carrollton Ave

Bills for divorce, a
vinculo matrimonii

Mr. Clerk
Please file
and issue for the
defendant. Make
cost returnable at
next Rule Day.

S. P. Pendleton
Clerk of Court

1330/04

FILED 28 Nov 1925

Martrude Frazier, *

In the

vs *

Circuit Court of Baltimore City

Harold E. Frazier, *

To the Honorable, the Judge of said Court:

The Bill of Complaint respectfully says:

1. That the plaintiff and devendnat were lawfully married on the 20th day of December 1915 and lived together as husband and wife until about three ago, when the defenant left to live with an other woman as a wife.

2. That during the time the parties were living together, the plaintiff was a true and devoted wife to her husband, that her conduce respecting her marriage vows is about reproach at any time or since.

3. That two (2) children: Hazel now 9 years old and Thelma now 5 years old were born to the parties by reason of said marriage, now in her custody and which custody she prays at the close of these proceedings.

4. That the plaintiff has lived in Baltimore City for more than two years next before this suit was filed and that the defendant also resides in said city.

5. That the defendant, Harold E. Frazier, is guilty of the crime of adultery with divers different women in Baltimore City the names and places thereof she is not fully infromed, but that since the discovery thereof, the plaintiff has not condoned the said offences or lived or cohabitted with the defendant in any or maner whatever.

6. That the plaintiff is without means to prosecute these proceedings, anc to support herself and two said minor children, but that the defendant is a man of means with an income of twenty-five dollars as a bar attender, paryable weekly, and other means which she does not fully know, but fully able to support her and the two minor children, she is therefore advised that she is entitled to an order of this Court requiring the defendant to pay and provide to the costs of these proceedings and herself and two minor children and her Solicitor's fees in this case.

To the end, therefore she prays the following:

1. That she be divorced a vinculo matrimonii from the defendant Harold E. Frazier.

2. That she be allowed a reasonable sum of money to pay the costs of these proceedings, alimony pendente lite, which to be made permanent at the close of this case, for the said two minor children and a further order to pay and provide for the Solicitor's fees to prosecute these proceedings in her behalf.

And such other and further relief as her case and equity shall require.

May it please your Honor to grant unto her the writ of subpoena directed to the said Harold EL Frazier, residing in Baltimore City, commanding him to be amd appear in this Honorable Court on some certain day to be named therein and to appear and answer the Bill of Complaint and to show good and sufficient cause, if any, he may have why the prayers of said Bill should not be granted as therein prayed.

And as in duty bound etc.,

Mrs Martrude Frazier
Complainant in this case.

G. L. Rudolph
Solicitor for Complainant.

P334

Ct. Ct.

B-986
1925. Docket No.

Gurtrue Frazier

vs.

Harold E. Frazier
1836 Division St. or
1014 Carrollton Ave.

SUBPOENA TO ANSWER BILL OF COMPLAINT

rw

No. B-30104

(2)

Filed 2 Dec 1925, 192...

G. L. Pendleton SOLICITOR

11-14

*Summoned and a copy of the Process left with
the Defendant
by cutt
12/1/25*

Fee \$0.80

*John E. Potes
Sheriff*

EQUITY SUBPOENA

The State of Maryland

On Harold E. Frazier

of Baltimore City, Greeting:

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

Gurtrude Frazier

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 November, 192 5 Issued the 30th day of November, in the year 192 5.

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.

✓ B Docket 986

CIRCUIT COURT.

Gurtrude Frazier

vs.

Harold C. Frazier
1836 Division St
1014 Carrollton Ave

Order for Alimony

Pendente Lite

ORDER

B No. 230104

25.00 (3)
2 minor children

Fd: 30 Nov 1925

11-14

Copy of the within Order of Alimony served on
Harold C. Frazier on the 4th day of December 1925.
in Presence of Joseph E. Lyett. John E. Patee
Sheriff
Fees \$0.50

Gertrude Frazier

vs.

Harold E Frazier

IN THE
CIRCUIT COURT

OF
BALTIMORE CITY

November TERM, 1925

ORDERED BY THE COURT this 30 day of November 1925

that the defendant Harold E Frazier
pay to the plaintiff Gertrude Frazier
the sum of Seven 7/10

Dollars per week, during the continuance of this suit, accounting from the 30"
day of November 1925 to the said plaintiff Gertrude Frazier
as alimony, *pendente lite* unless cause to the contrary be shown on or before the 15"
day of December 1925, provided a copy of this Order be served on the said defendant
Harold E. Frazier on or before the 8"
day of December 1925

George A. Solter

TRUE COPY—TEST:

CLERK

IN THE CIRCUIT COURT OF

B-986
BALTIMORE CITY.

1925

GURTRUDE FRAZIER

VS.

HAROLD E. FRAZIER.

B 30104

(4)

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

Javist Evans

ATTORNEYS FOR RESPONDENT.

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

Filed 14 Dec 1925

GURTRUDE FRAZIER

:

IN THE CIRCUIT COURT

VS.

:

OF

HAROLD E. FRAZIER

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the bill of complaint in the above entitled cause, respectfully says:

1. That he admits the first paragraph of the bill of complaint as to the date of marriage but denies the rest of the said first paragraph.
2. That he denies the second paragraph of the bill of complaint.
3. That he admits the allegations contained in the third paragraph of the bill of complaint.
4. That he admits the fourth paragraph of the complainant's bill of complaint.
5. That he denies with great emphasis the allegations contained in the fifth paragraph of the complainant's bill of complaint.
6. That he denies the sixth paragraph of the complainant's bill.

WHEREFORE your respondent prays that the bill of complaint be dismissed with costs to the plaintiff.

Davis Evans

ATTORNEYS FOR RESPONDENT.

13-986

1925.

No.

Ct. Ct.

Docket

Arthur Meyer

vs.

Howard E. Meyer

MOTION FOR HEARING

B30104
[57]

No.

Filed 16 day of Dec 1925

G. L. Pendleton

Davis & Evans

Gertrude Frazer

VS.

Howard E. Frazer

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The *Complainant*

by

H. P. Anderson

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

for hearing

Alimony ✓

in conformity with the First Equity Rule.

H. P. Anderson

Solicitor for

Serve on

Davis & Evans

Served at Dec 18, '25
J. H. [unclear]

215
St Paul

CIRCUIT COURT

Ct. Ct.

B 986

192 5

No.

Docket

Frazier

vs.

Frazier

NOTICE OF HEARING

1 copy

By No. *30104*

167

No.

Filed 16th day of Dec. 1925

H

*Copy of the within Notice served on Davis and Evans,
Solicitors on the 18th day of December, 1925, and
the presence of Louis Hecht.*

New \$0.50

John E. Potter
Sheriff

MONTEWALL
LEDGER

Gertrude Frazier

vs.

Howard E. Frazier

IN THE

CIRCUIT COURT

OF BALTIMORE CITY

Upon application made by the Solicitor for the Complainant

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 Alimony &c.

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

986
CIRCUIT COURT

986

1923 B

No.

Docket.

Gertrude Frazier

vs.
Harold C. Frazier

Final Order, Counsel Fee and Alimony

Pendente Lite.

No. *30104* B
(7)

Filed

11 Jan

1926

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

Gertrude Frazier
vs.

Harold E. Frazier

Jan Term, 192*6*

This cause coming on to be heard upon the petition for Alimony *pendente lite* and Counsel fee, and the answer thereto, and testimony taken, and having been submitted by the solicitors for the respective parties;

ORDERED by the Circuit Court of Baltimore City this *11th* day of *Jan* 192*6*, that the *Defendant, Harold E. Frazier* pay to the *plaintiff, Gertrude Frazier* the sum of _____ Dollars, as counsel fee for the Solicitor of the _____ and that he further pay the sum of *five* Dollars per week, to the said *Gertrude Frazier* as Alimony *pendente lite* accounting from the *11th* day of *January* 192*6* and continuing until the _____ day of _____ 192____, (should this suit be so long pending) or until the further order of this Court.

*Payable through the prisoners aid association,
C. Frank*

986-1925

B

Circuit Court

B 986

192 5

Docket.....

Gertrude Stazier

vs.

Harold E. Frazer

Sapp.

Petition for leave to take
Testimony and Order of
Court thereon

B No. 30104
(8)

Filed..... 9 Feb 192 6

Gertrude Frazier

vs.

Harold E. Frazier

IN THE
Circuit Court
OF
BALTIMORE CITY

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

THE PETITION OF

Gertrude Frazier

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.

G. L. Rudolph
Solicitor for

ORDERED, this *9* day of *February* 192*6*, 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.

James P. Gorter

986-1925

Serve on
Davis and Evans

Service admitted
May 12, 1926.
Davis & Evans.

In the Circuit Court
of B 986
Baltimore City 1925

Gertrude Frazier
1707 Baker St
or 1705 " "

Harold E. Frazier

B 30104
(9)

Order to require
defendant to pay costs

(Order)
Mr. Clerk
Please file
P. L. Deuchler
Solicitor Compt

FILED 10 May 1926

Copy of the within Order of Court served on Davis and
Evans, Solicitors on the 15th day of May, 1926, in
the presence of Louis Hacht
John E. Potter Sheriff
Fee \$0.50

215
St. Paul

Gurtrude Frazier *
*
vs *In the Circuit Court of Baltimore City
*
Harold E. Frazier *

To the Honorable, the Judge of said Court:

The Petition of the Plaintiff in this case

respectfully says:

1. That by the prayers of her bill filed in this case, it will be seen that she prayed that the defendant pay the costs of these proceedings.
2. That the testimony has been taken but not return because of the non-payment of the costs which amounts to the sum of twelve dollars.
3. That immediately after the payment of the Examiner's fee, the Master fee will be due and payable and other costs.

Your petitioner therefore prays:

That the costs be paid by the defendant forth with.

And such other and further relief as her case and equity require.

And as in duty bound etc.

Gertrude Frazier

J. L. Rudolph
Solicitor for Complainant.

Stat of Maryland

SS : -

City of Baltimore

I hereby certify that on this 7th day of May 1926, before me the subscriber a Notary Public of the State of Maryland in and for said city, personally appeared Gertrude Frazier and made oath in due form of law that the matters and things set out in the foregoing are true to the best of her knowledge and belief.

Witness my hand and Notarial Seal.

Caroline Murray
Notary Public

Upon the foregoing Petition and affidavit, by the
Circuit Court of Baltimore City, this 10 day of *May* 1926,
ordered and directed that Harold E. Frazire, the defendant in
this case be ~~and~~ *on or before the 25 day of May 1926* he is hereby required to show cause why he
should not be required to pay the costs in these proceedings,
provided a copy of this order be served upon him or his Solicitor
of record on or before the 17 day of *May* 1926.

W. J. Frank

786-1925
IN THE CIRCUIT COURT OF
BALTIMORE CITY.

B 986
1925

GERTRUDE FRAZIER

VS.

HAROLD E. FRAZIER

RESPONDENT'S ANSWER
TO PETITION.

1230104

Mr. Clerk:-

107

Please file.

Davis & Evans
ATTORNEYS FOR RESPONDENT

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE

BALTIMORE, MD.

Filed 25 May 1926

GERTRUDE FRAZIER

:

IN THE CIRCUIT COURT

VS.

:

OF

HAROLD E. FRAZIER

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your respondent answering the petition for payment of cost says:

I. That he is paying to Your Oratrix a certain sum per week as alimony pendente lite and that he is unable to pay the cost in a lump sum, your respondent being a working man for a small salary.

2. Your respondent says that he is willing and able to pay the cost through the Prisoners' Aid Association at the rate of two dollars per week.

Wherefore your respondent prays:

(A) That your respondent be premitted to pay the cost through the Prisoners' Aid Association.

Davis & Evans

ATTORNEYS FOR RESPONDENT

986
BOOKED 2222 N.W.D

B 986
1926.

Cir. Ct.

No.....

Frazier
vs.

Frazier

Attachment in Equity.

B No. 30104
(11)

Filed 21 day of July 1926

11

(ATTACHMENT IN EQUITY)

MARYLAND, Sc.

The State of Maryland.

To the Sheriff of Baltimore City, Greeting:

You are Hereby Commanded, that you attach the body of

Harold Carroll

E Frazier, 1836 Division St

if he shall be found in your bailiwick, and he sake keep, so that you have him before

the Judge of the Circuit Court, of Baltimore City, at the Court house in the same city, on

when apprehended

the *day of* 19 *26*, to answer as well touching a certain contempt

by him committed in not

Obeying order Court dated 11th day of January 1926 and failing to pay alimony as provided therein.

as well as to such other matters and things as shall be then and there alleged against h

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 *12* day of *July* 19 *26*

Issued the *21* day of *July* 19 *26*

Chas. R. Whelan Clerk.

*Let attachment issue
attachment quashed. Self got out & confined to hospital. Last
job. Court about June 10 - time of 1st default. Alimony & interest
orders suspended by order June 10. Eugene P. Dunne
as July 20, 1926. E. P. Dunne (without costs) E. P. D.*

BOOKED 22345 N.W.D.

B 986
1925

Cir. Ct.

No.....

Arthur Froger
vs.

Harold E. Franzen

Attachment in Equity.

B 30104
No.....
(12)

Filed 27 day of July 1926

P 2477 11

Attachment Proven
Wells & Beckley
August 4, 1926

Sealed by
H. H. Jones
27 July



(ATTACHMENT IN EQUITY)

MARYLAND, Sc.

The State of Maryland.

To the Sheriff of Baltimore City, Greeting:

You are Hereby Comanded, that you attach the bod of _____

Harold E. Frazer
1836 Division St

if he shall be found in your bailiwick, and *him* sake keep, so that you have *him* before

the Judge of the Circuit Court, of Baltimore City, at the Court house in the same city, on

when apprehended
the _____ day of _____ 19____, to answer as well touching a certain contempt

by *him* committed in not

obeying order of this Court dated
11th day of January 1926

as well as to such other matters and things as shall be then and there alleged against *him*

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 *12* day of *July* 19 *26*

Issued the *27* day of *July* 19 *26*

Chas R Whiteford Clerk.

Let attachment issue

Joseph N Helman

Doc. B $\frac{986}{1905}$

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Gertrude Frazier

vs.

Harold E Frazier

No. 30104B

PLAINTIFF'S COSTS

Examiners..... \$.....
Copies.....
Sheriff.....
Stenographer.....
\$ _____
=====

DEFENDANT'S COSTS

Examiners..... \$.....
Copies.....
Sheriff.....
Stenographer.....
\$ _____
=====

17/2/5/1/5

Gertrude Frazier

vs.

Harold E Frazier

In the Circuit Court
OF BALTIMORE CITY.

The above cause being at issue

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
nineteenth day of *February* 19 *26*, met on
the *eighteenth* day of *March* in the year nineteen
hundred and *twenty-six* at my office, in the city of Baltimore, in the State
of Maryland, and assigned the *nineteenth* day of *March*
in the same year at *four* o'clock in the *after-*noon and the
office of *George S. Pendleton, Esq.* 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
Plaintiff..... to take the following depositions, that
is to say:—

8-4-8.
Bill "but don't
return."

GERTRUDE FRAZIER

VS.

HAROLD E. FRAZIER.

Testimony taken before me, A. deRussy
Sappington, Examiner, at the offices of G. L. Pendle-
ton, Baltimore, Md. on March 19, 1926, at 4.00 o'clock
in the afternoon.

--

Thereupon---

ELMER JOHNSON,

a witness of lawful age, produced on behalf of the
plaintiff, 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 Elmer Johnson, 2849 Lincoln Avenue;

police officer.

Q Do you know the parties to this suit?

A Yes. I arrested Harold E. Frazier, and

I have met his wife.

By Mr. Pendleton:

Q How did you meet the defendant?

A I had a warrant for him for non support and I went to the house at 1836 Division Street to get him about five months ago.

Q What did you find there?

A I rapped on the door and he jumped out of bed and opened the door and I walked in and read the warrant to him and saw a woman lying in bed. I asked her what she was doing there and she said, "I'm just spending the night here" and he said, "Yes", and I arrested them both and charged them with adultery

Q What was the woman's name?

A Florence Brown.

Q Was it his wife?

A No.

Q You took them to the Station House?

A Yes, and they were tried the next morning and fined ten dollars and costs for adultery.

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.

Elmer Johnson

Thereupon---

DANIEL BURK,

a witness of lawful age, produced on behalf of the plaintiff, 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 Daniel Burk, 124 Calandar Street, police officer.

Q Do you know the parties to this suit?

A I have met them. I was there with Officer Johnson when he arrested Frazier.

By Mr. Pendleton:

Q You were with Officer Johnson when he arrested Harold E. Frazier and Florence Brown?

A Yes.

Q When and where was it?

A About five months ago, at 1836 Division Street.

Q Was the woman who was arrested with him and taken out of bed by Officer Johnson his wife, the woman in this room (indicating)

A It was not, no.

Q Is this the woman (indicating) that was
fined tendollars and costs for adultery?

A No, sir.

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

off Daniel Burk

Thereupon---

GERTRUDE FRAZIER,

the plaintiff, of lawful age, produced on her own behalf, 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 Gertrude Frazier, 1707 Baker Street, maid.

Q Doyou know the parties to this suit?

A I am the plaintiff and the defendant is my husband.

By Mr. Pendleton:

Q When, where and by whom were you married?

A Decembe r 20, 1915, in Baltimore, Md. by Reverend Boston, a Minister of the Gospel.

Q Are you living with your husband now?

A No.

Q Which left the other, and when?

A He left me on March 11, 1921.

Q State whether or not you were always a kind, affectionate and faithful wife?

A I was.

Q Have you been a resident of the City of Baltimore, State of Maryland for more than two years prior to the filing of this suit?

A Yes, sir.

Q Are there any children as result of your marriage?

A Two; Hazel, 9, and Thelma, 6. They are with me.

Q Do you desire the custody of the children?

A I do.

Q Are you able and willing to support, rear and educate the children?

A Yes. My husband is under order of Court now to pay \$5.00 a week for the support of the children and I am satisfied if he continues to pay that amount.

Q You charge your husband with adultery, what do you know about that?

A I know a woman used to live at 1836 Division Street with him. That is where he went after he left me.

Q Have you lived or cohabited with your husband since you found out that he committed adultery?

A No, sir.

Q Never forgiven nor condoned his offense?

A No, sir.

Q Were you at the station house the next morning after he and this woman was arrested; when they were tried to adultery?

A Yes.

Q Do you know the woman with whom your husband was found in bed?

A Yes; Florence Brown. She used to go there and sleep with him. She is a tall high brown woman.

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

Mrs. Gertrude Frazier

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.....day of.....in the year of Our Lord nineteen hundred and *twenty-six*.....at the City of Baltimore, in the State of Maryland.

..... (SEAL).
Examiner.

There are *no*..... Exhibits with these depositions, to wit:

Plaintiff's..... Exhibit */*.....

Defendant's..... Exhibit */*.....

.....
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....., and on *none*..... by the Defendant.....

.....
Examiner.

Rec'd for safe keeping.