

3 218
1921

Gray

Gray
Hunt Term

2-Orders

B 22426
(1) (3)

9
DAVIS & BISHOP
ATTORNEYS AT LAW
BANNEKER BUILDING
4 E. PLEASANT STREET
BALTIMORE, MD.

1921
1921

copy of the within Order of court served on George Gray on the 30th day of April, 1921, at 7.15 o'clock P. M.
Also copy of the within Order of court served on The Provident Savings Bank of Baltimore City, a corporation by service on Charles C. Duke, Treasurer, on the 30th day of April, 1921, at 1.35 o'clock P. M. in presence of Peter E. Ring

Thomas F. W. Gentry
Sheriff

Fees \$1.00

Rosie Gray
Vs.
George Gray
and

In The Circuit
Court of Balti-
more City.

The Provident
Savings Bank of
Baltimore City.

To The Honorable, The Judge of said Court;
Your Oratrix, complaining, respectfully says:

1st. That the said Rosie Gray and the said George Gray were married in the city of Baltimore, state of Maryland, Oct., 26, 1920, by Rev. Jessup, a minister of the gospel; and that they ## lived together as man and wife until on or about the 15th, day of January, 1921.

2nd. That the said parties Rosie Gray and the said George Gray are residents of the city of Baltimore, state of Maryland, and have been for more than two years prior to the filing of this bill of complaint. That the said Provident Savings Bank of Baltimore, is a corporation, situated in and incorporated in and for the city of Baltimore, state of Maryland, under the laws of the state of Maryland.

3rd. That though the conduct of your oratrix towards her husband has always been kind and affectionate and above reproach, the said George Gray without any cause or reason abandoned and deserted your Oratrix and refuses to live with her any longer.

4th. That Your Oratrix has made repeated attempts at reconciliation.

5th. That the defendant, George Gray, is in possession of a bank book, issued by The Provident Savings Bank of Baltimore, which said bank book is issued in the names of both the said Rosie Gray and the said George Gray, and that the said funds in said defendant Bank represent more than one half the savings of the said Rosie Gray.

6th. That the said defendant recently expressed his desire and intention of withdrawing the funds of the said Rosie Gray and the said George Gray from the said defendant Bank; and that the said defendant, George Gray has disposed of a portion of his property in this state.

7th. Unless this Honorable Court will intervene to prevent this action on the part of the defendant, George Gray, the just claim and right to the plaintiff to her property will be defeated and she will be without redress.

8th. That, the defendant, George Gray by withholding the property of the plaintiff, has left Your Oratrix destitute and Your Oratrix is without funds with which to defray the expenses of this litigation and that she is advised by counsel that she is entitled to have an order passed by this Honorable Court, awarding her a sum certain as alimony pending this litigation, and a further sum to compensate her solicitor for his services in the cause.

9th. That there have been no children born as a result of the said marriage between the said Rosie Gray and the said ~~George~~ George Gray.

WHEREFORE YOUR ORATRIX PRAYS

a-A limony pendente lite.

b-A Divorce A Mensa et Thoro.

c-Counsel fee in such sum as the Court may direct.

d-That Your Honorable Court direct a writ of injunction or a restraining order enjoinng and restraining the sale of the defendant's property, to wit, a coal yard; and restaraing the withdrawal by the defendant George Gray of any money from the Provident Saving's Bank of Baltimore, until further order of this Court and restraining and enjoining the said Pravident Savings Bank of Baltimore from paying any money to the said George Gray until further order of this Court.

e-Such other and further releif as the case may require.

May it please your Honor to grant unto Your Oratrix the

Writ of subpoena, directed unto the defendant, George Gray, residing in Baltimore City and the defendant The Provident Savings Bank of Baltimore City, commanding them to be and appear in this Honorable Court on some day certain to be named therein, to answer such decree as may be passed therein.

C. Paul Davis

Attorney for Plaintiff

City of Baltimore)
) To Wit
State of Maryland)

I, the subscriber, a Notary Public of the city of Baltimore, state of Maryland, aforesaid, hereby certify that on this *29th* day of *April* in the year 1921, personally appeared Rosie Gray and made oath in due form of law that the facts as stated in the foregoing petition are true to the best of his knowledge and belief.

Caroline Murray

Notary Public

Rosie Gray

Vs.

George Gray

and

The Provident

Savings Bank of

Baltimore

In The Circuit Court

of

Baltimore City

-

On the forgoing bill and affidavit it is this 29th day of
 in the year 1921, ordered that a writ of injunction be issued
 as prayed in the said bill, restraining the said George Gray
 from selling or otherwise disposing of his property and from
 withdrawing any money from the Provident Saving's Bank of Bal-
 timore; and *also restraining the said Provident Savings Bank from paying*
any money to the said George Gray

W. H. Hester

49

Blcl

Ct. Ct.

1921

Docket No.

Gray

Gray
tc

SUBPOENA TO ANSWER BILL OF COMPLAINT

2 Pm

No.

22426

(21)

Filed

6 May

1921

J. Stewart Davis

SOLICITOR

19

Summoned George Gray and a copy of the process left with the defendant. Also summoned the Provident Savings Bank of Baltimore City, a corporation, by service on Charles C. Duke, Treasurer, and a copy of the process left with said Treasurer. Also notice of said summons left at the principal office of said corporation

Thomas F. Mc Guilly
Sheriff

(Ring) 30/21
Trees \$1.80

EQUITY SUBPOENA

The State of Maryland

To

George Gray

AP 4/30/21 7:15 P.M. (RM)

The Provident Savings Bank
of Baltimore City

AP 4/30/21 check to Duke
Takes at 1:31 P.M. (RM)

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 May next cause an appearance to be entered for you and your answer to be filed to the complaint of

Rosie Gray

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the 14 day of March 1921

Issued the 29 day of April, in the year 1921

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 *B 218*
BALTIMORE CITY *1921*

ROSIE GRAY,
Complainant,

vs.

GEORGE GRAY,
Respondent.

ANSWER TO BILL OF COMPLAINT

Mr. Clerk: Please file.

B 22426

(4)
Charles W. Main
Solicitor for Respondent

CHARLES W. MAIN
ATTORNEY AND COUNSELLOR AT LAW
LAW BUILDING
BALTIMORE, MD.

FILED *5 May 1921*

this fact is well known to the Complainant, the said Rosie Gray, who has endeavored in various ways to have her name inserted in said bank book, but has failed because this Respondent was unwilling to trust her with his money.

FIFTH: Answering the sixth paragraph of said Bill of Complaint, this Respondent denies that he ever expressed any intention of withdrawing his funds from the Provident Savings Bank, as he well knew that the Complainant, the said Rosie Gray, had no interest in said fund, although she had in various ways endeavored to persuade this Respondent to have her name inserted in the bank book as joint owner. And further answering paragraph six of the said Bill of Complaint this Respondent says that he did sell parts of his personal property for the reason that he had no use for the same and that he used the money to purchase the coal and wood business which he is now conducting at 241 Myrtle Avenue, in Baltimore City.

SIXTH: Answering paragraph seven of said Bill of Complaint, this Respondent states that the Complainant, the said Rosie Gray, has no interest whatsoever in the property of the Respondent, and that he is not disposing of the same, nor has the Complainant any interest whatsoever to be defeated by any action on the part of this Respondent.

SEVENTH: Answering paragraph eight of said Bill of Complaint, this Respondent says that he denies he is with-
from
holding, or depriving the Complainant of any funds or property which are justly due her, and further answering said paragraph eight, this Respondent says that the Complainant, the said Rosie Gray, did not have any property at the time she married this Respondent, and has not accumulated any since, nor did she assist the Respondent in accumulating any property during the time that they lived and cohabited together as husband and wife; that this Respondent amply provided for the Com-

plainant and often gave her large sums of money during the time that they lived and cohabited together, but that the Complainant frequently illtreated and abused the Respondent, and would have numbers of men visit her at her house while this Respondent was away at work, and that when this Respondent objected to the visits of the men to his house and their conduct while there, the Complainant would abuse and often threaten the Respondent with bodily harm, and that on several occasions she threatened to shoot the Respondent; that the Complainant has a pistol and stated to her neighbors that she intended to use it on her husband; that owing to the misconduct of the said Rosie Gray with divers other men, and fearing bodily harm and believing that his life was in danger, this Respondent did leave the Complainant on or about the 29th day of April, 1921, and took up his abode in another part of the City.

EIGHTH: And answering paragraph nine of said Bill of Complaint, this Respondent admits that no children were born to the union of the parties to this suit.

And having answered said Bill of Complaint and each paragraph thereof in so far as he is advised it is material so to do, this Respondent prays:-

(a) That the injunction issued out of this Honorable Court restraining him from disposing of any property and from withdrawing any of his funds from the Provident Savings Bank of Baltimore City may be dissolved.

(b) That the Bill of Complaint filed against him in this Honorable Court may be dismissed with reasonable cost.


And as in duty bound, etc.

Charles N. Main
Solicitor for Respondent.

George Gray
Respondent.

STATE OF MARYLAND, :
: To wit:-
CITY OF BALTIMORE, :

I HEREBY CERTIFY, That on this 4th day of
May, 1921, before me, the subscriber, a Notary Public of
the State of Maryland, in and for the City of Baltimore, a-
foresaid, personally appeared George Gray, the Respondent in
the foregoing answer to Bill of Complaint, and he made oath
in due form of law that the matters and facts set forth
therein are true to the best of his knowledge, information
and belief.


Notary Public.

J. Steward Davis

5

219

Ct. Ct.

1921

No.

Docket

George Gray

vs.

George Gray

MOTION FOR HEARING

B 22426

No.

5

Filed

9

day of

May

1921

Clara W. M'ann

Rosie Gray

VS.

George Gray

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The Plaintiff
her

by J. Stewart Davis

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

for hearing on *an alimony pendente lite & Counsel fees*

in conformity with the First Equity Rule.

J. Stewart Davis

Solicitor for Plaintiff

Serve on
Chas. W. Main

B-219
1921 No. Ct. Ct. Docket

Rosie Gray

vs.

George Gray

NOTICE OF HEARING

B No. 22426
6

No.

Filed 10 day of May 1921

Copy of the within Notice served on Chas W Main
Solicitor on the 12th day of May 1921 in presence
of Harry B Gray
Fees \$ 0.50
Thomas D McNulty
Sheriff

ROSIE GRAY

VS

GEORGE GRAY

IN THE

CIRCUIT COURT

OF BALTIMORE CITY

Upon application made by the Solicitor for the plaintiff

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 pendente & Counsel fee

when reached in due course on said Calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court

3/17/1913

IN THE
CIRCUIT COURT *B 218*
OF *1921*
BALTIMORE CITY

ROSIE GRAY
VS.
GEORGE GRAY

DECREE OF COURT.

B 22426
7

CHARLES W. MAIN
ATTORNEY AND COUNSELLOR AT LAW
LAW BUILDING
BALTIMORE, MD.

FILED *10 May 1921*

Rosie Gray,
Complainant,

vs.

George Gray,
Respondent.

*The Provident
Savings Bank* :: :: :: :: :: :: ::

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

Decree of Court.

In this case the motion for a dissolution of the injunction heretofore issued standing ready for a hearing, and having been submitted, the counsel for the parties were heard and the proceedings read and considered.

It is thereupon this tenth day of May, 1921, by the Circuit Court of Baltimore City, adjudged and ordered that the injunction heretofore issued in this case be, and the same is hereby, dissolved.

Chas. H. H. H. H.

48 Ct. Ct.
19 21 Plea Docket

Rosie Gray

vs.

George Gray

SUMMONS FOR WITNESSES

B 22426

No. 8

Filed 13 day of May 19 21

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

B 218
1921

ROSIE GRAY
vs.
GEORGE GRAY

CROSS BILL

GEORGE GRAY
vs.
ROSIE GRAY

CROSS BILL OF COMPLAINT

Mr. Clerk: Please file.

B 22426

Charles W. Main
Solicitor for Complainant in
Cross Bill.

CHARLES W. MAIN
ATTORNEY AND COUNSELLOR AT LAW
LAW BUILDING
BALTIMORE, MD.

FILED

17 May 1921

ROSIE GRAY,
Complainant,

::

vs.

::

GEORGE GRAY,
Respondent.

::

CROSS BILL.

::

GEORGE GRAY,
Complainant,

::

vs.

::

ROSIE GRAY,
Respondent.

::

::

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

:: :: :: :: :: :: :: :: :: ::

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

The Complainant in the Cross Bill, George Gray, respectfully represents to the Court as follows:-

FIRST: That heretofore Rosie Gray, the wife of this Complainant, filed her Bill of Complaint against him in this Honorable Court alleging among other things that this Complainant had, without just cause, deserted and abandoned her, the said Rosie Gray, and that this Complainant had refused to contribute to her support and that she was without means to provide for herself and to retain counsel to prosecute her suit, and thereupon the said Rosie Gray prayed for a divorce a mensa et thoro from this Complainant, and that she might be allowed a suitable sum as permanent alimony.

SECOND: That this Complainant has answered said Bill of Complaint, and in his answer has shown that the said Rosie Gray is not entitled to any relief in this Honorable Court, and he also denied all of the material allegations alleged in said Bill and each paragraph thereof.

THIRD: That this Complainant in the Cross Bill, George Gray, and the Respondent in the Cross Bill, Rosie Gray, were married in the City of Baltimore, State of Maryland, on the

26th day of October, 1920, by the Rev. Mr. Jessup, a regularly ordained Minister of the Gospel of the Methodist Church.

FOURTH: That both the Complainant and the Respondent in the Cross Bill are residents of the City of Baltimore, State of Maryland, and have resided in said City and State for more than two years last past.

FIFTH: That no children were born to the union of the parties to this suit.

SIXTH: That during the time that this Complainant and the Respondent in the Cross Bill, the said Rosie Gray, lived and cohabited together as husband and wife, she frequently illtreated and abused this Complainant, and on or about the 9th day of April, 1921, he was compelled to leave their house on Sarah Ann Street because the Respondent in the Cross Bill, the said Rosie Gray, had obtained a pistol and threatened to kill this Complainant; that since the separation of the parties on the 9th day of April, 1921, this Complainant was informed that the Respondent in the Cross Bill, the said Rosie Gray, has a former husband living in Baltimore City from whom she has never been divorced; that upon receiving the aforesaid information this Complainant investigated the matter and found William Barton living at #809 N. Vincent Street, who stated to this Complainant that he was married to the said Rosie Barton, now known as Rosie Gray, in the State of Maryland, about the year 1896, and that he separated from her about the year 1906 or 1907, and that he has never been divorced from her; that she deserted him, the said William Barton, and that he has some of her furniture and personal effects in his house at #809 N. Vincent Street.

SEVENTH: That since this Complainant received the information that the Respondent in the Cross Bill, the said Rosie Barton, now known as Rosie Gray, is not divorced from

her husband, William Barton, this Complainant has not lived nor cohabited with her.

WHEREFORE, the premises considered, the Complainant in the Cross Bill prays as follows:-

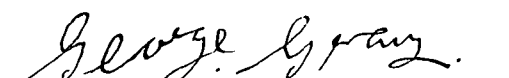
(a) That the marriage entered into between the Complainant in the Cross Bill, George Gray, and the Respondent in the Cross Bill, Rosie Gray, on the 26th day of October, 1920, may be annulled and declared to be of no effect.

(b) That he may have such other and further relief as the Court may deem meet and proper and as the exigencies of his case may require.

MAY IT PLEASE YOUR HONOR, to grant unto the Complainant in the Cross Bill the writ of subpoena, directed to the Respondent, the said Rosie Gray, who resides in the City of Baltimore, State of Maryland, commanding her to be and appear in this Honorable Court on some certain day to be named therein to answer the premises and abide by and perform such decree as may be passed therein.

And as in duty bound, etc.


Solicitor for Complainant in
Cross Bill.


Complainant in Cross Bill.

STATE OF MARYLAND, :
: To wit:-
CITY OF BALTIMORE, :

I HEREBY CERTIFY, That on this 17th day of May, 1921, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared George Gray, the Complainant in the Cross Bill of Complaint, and he made oath in due form of law that the matters and facts set forth therein are true to the best of his knowledge, information and belief.


Notary Public.

75

218 Bl 1

Ct. Ct.

192

Docket No.

Gray

Gray

~~Case~~
SUBPOENA TO ANSWER BILL OF COMPLAINT

B

Pro

No.

22426

10

705 Sarah Ann

Filed

13 June 1927

Clara Mauer

SOLICITOR

9

Now Est.
Thomas F. M. - Pulley
Sheriff
(Ring)

EQUITY SUBPOENA

The State of Maryland

On

Rose Gray

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 ~~JUNE~~ next cause an appearance to be entered for you and your answer to be filed to the complaint of

June 17 next

George Gray

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the ~~9th~~ day of ~~May~~ 1921

Issued the *17* day of ~~May~~, in the year 1921

MORRIS A. SOPER

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

On

Rose Gray



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 cause an appearance to be entered for you and your answer to be filed to the complaint of

JUNE next
Laws/Beef of

George Gray

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the 9th day of May 1921

Issued the 17 day of May, in the year 1921

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.)

108

Ct. Ct.

219
1921 B61 Docket No.

Gray

Gray

SUBPOENA TO ANSWER BILL OF COMPLAINT

To

No. B. 22426

"

Wm Sarah Ann

Filed 17 July 1921

Chas W Mond SOLICITOR

9

Now Each
Thomas J. McCully
Sheriff
(Ring)

EQUITY SUBPOENA

The State of Maryland

To

ROSIE GRAY

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 GEORGE GRAY

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the 9th day of May 192 1 Issued the 14 day of June, in the year 192 1

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

ROSIE GRAY



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 ^{cross bill of} complaint of

GEORGE GRAY

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the 9th day of May 1921
Issued the 14 day of June, in the year 1921

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.)