

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

63 B 619

WILLIAM GREER .

1923

VS.

BULAH GREER

BILL OF COMPLAINT

Mr. Clerk:-

Please file etc.,

Hartwell M. King
Sol. for Plaintiff.

B25950
47

HARTWELL M. KING

ATTORNEY AT LAW

216 ST. PAUL PLACE

BALTIMORE, MD.

FILED

25 Sept 1923

WILLIAM GREER

VS.

BULAH GREER

*

IN THE CIRCUIT COURT

OF

*

BALTIMORE CITY.

*

*

TO THE HONORABLE, THE JUDGE OF SAID COURT:

YOUR ORATOR, COMPLAINING, SAYS:

FIRST: THAT he was married to his wife, Bulah Greer on the 27th day of March, 1921, in the City of Baltimore, State of Maryland, by a religious ceremony.

SECOND: THAT both of the parties to this suit are residents of the City of Baltimore and have resided in the State of Maryland for more than two years immediately prior to the filing of this Bill of Complaint.

THIRD: THAT no children were born to the said parties as a result of their union.

FOURTH: THAT though the conduct of your orator towards his wife, the said Bulah Greer, was always kind, affectionate and above reproach, she deserted and abandoned him without just cause or reason on or about the first day of September, 1922, and has since declared her intention to live with him no longer.

FIFTH: THAT your orator has discovered that on divers days and times since their said marriage and the filing of this Bill of Complaint his wife, the said Bulah Greer, has committed the act of adultery with certain lewd and abandoned men in the City of Baltimore and elsewhere, the names of whom your orator will endeavor to disclose at the hearing of this cause.

SIXTH: THAT since having discovered the adulterous acts of the said defendant, your orator has neither lived or cohabited with his said wife nor has he in anywise condoned the same.

TO THE END, THEREFORE:

- (a) THAT your orator may be divorced A. VINCULO MATRIMONII from his wife, the said Bulah Greer.
- (b) THAT your orator may have such other and further relief as his case may require.

MAY it please your Honor to grant unto your orator the writ of subpoena, directed unto the said Bulah Greer, residing in the City of Baltimore, State of Maryland, commanding her to be and appear, in this Court, either in person or by Solicitor, on some certain day to be named therein, and show cause, if any she may have, why a decree should not be passed as prayed.

AND as in duty bound &c.,

Will Geer
Plaintiff.

Hartwell M. King
Solicitor for Plaintiff.

477

629 B63

Ct. Ct.

1923

Docket No.

Green

"
Greer

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pro

No.

B 26950

Filed

8 Oct (2)

1923,

H M Long

SOLICITOR

8

Summored and a copy of the Process left with the clerk out

(Bunn) Thomas J. McNulty
10-1-23. 6
Sheriff

EQUITY SUBPOENA

The State of Maryland

In

Bulah Greer

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

William Greer

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 **September** 192**3**

Issued the *25* day of **September**, 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.)

Bedak Green

~~1411~~ Orange

1412 Orange

IN THE CIRCUIT COURT

63^{OF} B 629
BALTIMORE CITY

1922

WILLIAM GREER
845 Boyd St.

VS.

BEULAH GREER

B 25950

RESPONDENT'S ANSWER

13

Mr. Clerk:-

Please file.

J. Steward Davis
Attorney for Respondent.

A 5 October 1923

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE
BALTIMORE, MD.

WILLIAM GREER : IN THE CIRCUIT COURT
VS. : OF
BUELAH GREEN I 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)

Your respondent admits the first paragraph of the complainant's bill.

(2)

She admits the second paragraph of the complainant's Bill.

(3)

She admits the third paragraph of the complainant's bill.

(4)

She denies with great emphasis the fourth paragraph of your complainant's Bill.

(5)

She denies with great emphasis the fifth paragraph of the complainant's bill.

Your respondent further states that she is destitute and without funds to defray the expenses of this litigation; further that she is without the means of support for herself. She is advised by counsel that she is permitted to petition this Honorable Court that the Complainant shall be compelled to contribute a reasonable amount as alimony pendente lite towards her support, and that she will also be awarded an amount in order to compensate her Solicitor.

Your complainant is employed and earns from twenty-eight to thirty dollars per week.

AND as in duty bound, etc.

J. Steward Davis
Solicitor for Defendant.

Docket 629

1923

Circuit Court

Green

vs.

Green

845 Boyd St

Order Counsel Fee and Alimony

Pendente Lite

D 2 5950
No.

(4) (5)

J. S. Davis

Oct 19 23
11 24 1923

61#
52-66-01

Mon. Est

(Keene)

2nd Roster

Shomas. J. Mc Nulty

Shriff.

copy of the within Order of Court served on
William Green on the 27th day of October 1923
in presence of James E. Keene - Shomas. J. Mc Nulty
Tues \$0.50 Shriff.

William Greer

vs.

Buelah Greer

-IN THE-
CIRCUIT COURT

-OF-

BALTIMORE CITY

Sept TERM

ORDERED BY THE COURT this 8th day of October 19 23

that the Plaintiff William Greer

pay to the Defendant Buelah Greer

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 Buelah Greer

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 93

day of October 19 23, provided a copy of this Order be served on the said Plaintiff

William Greer on or before the 18

day of October 19 23

Henry Duggan

TRUE COPY—TEST:

CLERK

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this *24th* day of *October* 192*3*, , that the time for showing cause under said Order be extended to the *9* day of *November* 192*3*, and the time for service of a copy of the same be extended to the *3* day of *November* 192*3*.

Henry Saffoy

Sap.

Circuit Court No. 2

63B-629

192 3

Docket.....

William Greer

vs.

Bulah Greer

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

B 125950

No. *Sapp(6)*

20 Nov
Filed....., 192 3

William Greer

vs.

Bulah Greer

IN THE
Circuit Court No. 2,

OF
BALTIMORE CITY.

**To the Honorable the Judge of the
Circuit Court No. 2 of Baltimore City:**

THE PETITION OF William Greer, 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.

Hartwell M. King
Solicitor for Plaintiff

ORDERED, this 20 day of November 192 3, 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 Duff

William Greer

vs.

Bulah Greer

IN THE
Circuit Court No. 2,

OF
BALTIMORE CITY.

**To the Honorable the Judge of the
Circuit Court No. 2 of Baltimore City:**

THE PETITION OF William Greer, 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.

Hartwell M. King
Solicitor for Plaintiff

ORDERED, this 20 day of November 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.

Henry Duff

69 B. 629

Cir. Ct. No. 2.

1923

Docket No.

William Greer

vs.

Bulah Greer

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file,

Hartwell M. King
Solicitor for Plaintiff.

B 2 5950

No. *(8)*

Filed *14 Jan* 192*4*

William Greer

vs.

Bulah Greer

In the Circuit Court ~~No. 2~~
Of Baltimore City.

.....TERM 192.....

To the Honorable

Judge of the Said Court:

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

Hartwell M. King

Solicitor for Plaintiff,

[Signature]

Solicitor for Defendant.

629
192 3 *163* Circuit Court
Docket No.

Greer

vs.

Greer

Order of Reference
and Report

B 25950

No.

coe 597

Order Filed *16* day of *Jan* 192*4*
Report Filed _____ day of _____ 192

629

William Greer

vs.

Bulah Greer

IN THE
Circuit Court

OF

BALTIMORE CITY

Jan

Term, 1924

16"

This case being submitted, without argument, it is ordered by the Court, this
day of *January*, 1924, that the same be and it is hereby referred to
Maud B. Coe, Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.

Charles F. Skum

Report of Auditor and Master

Bill for divorce a vinculo matrimonii filed by the husband against
his wife on the ground of adultery. Code Art. 16 secs. 36-41.

Defendant summoned and answers by solicitor.

Plaintiff's residence in Baltimore City for more than two years
proven.

The marriage proven.

The adultery proven.

More than thirty days have elapsed since the filing of the bill.

Case submitted and ready for decree.

Maud B. Coe

Auditor and Master.

January 18th, 1924.

CIRCUIT COURT

B. 629
1923 No. Docket

WILLIAM GREER

VS.

BULAH GREER

Recorded

Feb 2 / 1923

Decree of Divorc

B No. 25950

The within is a proper decree to
in this case.

Maud B. ...
Auditor and Master.

Ed. 28 January 1924

IN THE

Circuit Court

OF

BALTIMORE CITY

..... WILLIAM GREER

VS.

..... BULAH GREER

January Term, 19*24*

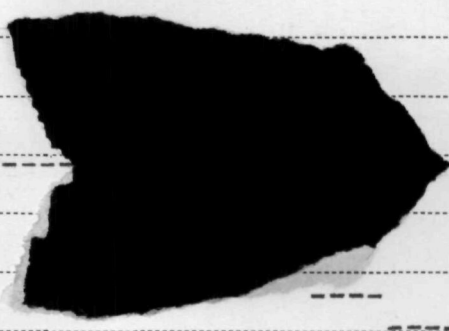
This cause standing ready for hearing, and being duly submitted, the proceedings were by the Court read and considered.

✓ It is thereupon, this *28th* day of *January*, A. D. 1924.

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said

----- William Greer -----

the above named Complainant be and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, the said Bulah Greer.



And it is further Ordered, That the said ----- complainant ----- pay the cost of this proceeding.

Charles H. Steen

Doc. B 629
1923

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

William Greer

vs.
Paula Greer

No. 25950B

PLAINTIFF'S COSTS

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

DEFENDANT'S COSTS

Examiners.....\$.....
Copies.....
Sheriff.....
Stenographer.....

A 14 Jan 1924

3/13/11/21

William Greer

.....

vs.

Bulah Greer

.....

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

virtue of an order of the above named Circuit Court, passed in said cause on the

twentieth day of November 1923, met on

the fifth day of December in the year nineteen

hundred and twenty-three at my office, in the City of Baltimore, in the State

of Maryland, and assigned the sixth day of December

in the same year at three o'clock in the afternoon and the

office of Hartwell M. King Esq. in the City and State

aforsaid, 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:—

8-4-23

1

Greer,

v.

Greer.

Testimony taken at the office of Mr. King,
Baltimore, Maryland, December 6th., 1923, at three
o'clock P. M.

Mary Veney, a witness of lawful age, pro-
duced on her own behalf, having been first duly
sworn, deposes and saith as follows, that is to say:

By the Examiner:

1 Q. State your name residence and occupation?

A. Mary Veney, 748 Ryan Street; house work.

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

A. Yes.

By Mr. King:

1 Q. Are they husband and wife?

A. Yes.

2 Q. Did they live together as husband and wife
and were they always known and recognized in the
community in which they lived as husband and wife?

A. Yes.

3 Q. Has the Plaintiff been a resident of Baltimore
City, State of Maryland, for at least two years prior to
the filing of this suit?

A. Yes.

Mary Veney.

3 Q. Are there any children as the result of this marriage?

A. No.

5 Q. What was the Plaintiff's conduct towards his wife, while living together?

A. As far as I know he treated her good.

5 Q. State whether or not in your opinion he was always a kind, affectionate and faithful husband?

A. Yes; he seemed to be.

6 Q. Are the parties to this suit living together now?

A. No sir.

9 Q. Which left the other; do you know?

A. She left him.

10 Q. When?

A. It was in the Summer time of 1922.

11 Q. The Plaintiff has alleged that it was September 1922; was it about that time?

A. Somewhere around that time.

12 Q. Now, he has charged his wife with adultery; do you know anything about that?

A. Well, I have been to the house, and I saw company come in, you know, and I saw another fellow by the name of Scott, and he came in and talked a while, and after a while they would go in the front

Mary Veney.

room and then they would go upstairs, and I would sit there for a while and me and my husband would go home, and we would go to bed; it was late; it was warm part of the time and she would throw her head out of the window and talk with us, and this man would also, and we would talk together.

13 Q. Then do you mean to say that they would leave you downstairs and they would go upstairs?

A. Yes.

14 Q. And where would they go upstairs; into what room?

A. Well, I can not say what room, but I know that they put their heads out of the front windows sometimes and talk upstairs.

15 Q. Do you know what that front room was at that time; was it or not a bed room.

A. Yes; it had a bed in it.

16 Q. Now, did you ever see any misconduct or affection between the two of them.

A. They would sit and talk private like, and I have seen them hug and kiss each other.

17 Q. Did you see Scott kiss her more than once?

A. Yes.

Mary Veney.

18 Q. And at the times you would see them hugging and kissing each other, was it at those times that they would leave the room and go upstairs?

A. Yes.

19 Q. Did you ever have any conversation with the Defendant about her conduct with this man?

A. Yes; and she would say that it was her friend.

20 Q. Did she ever tell you about this man staying there with her all night?

A. Yes, sometimes I used to see him going out in the morning and I would speak to her about it, and she would say "Yes, he stayed all night last night with me".

21 Q. In these conversations that you had with the Defendant, did she or did she not admit her adulterous relations with this man to you.

A. Yes; she said that they slept together, and what a nice time she had.

22 Q. Then she did admit her adulteries to you in this way.

A. Yes, but I would hate to say what she said.

23 Q. When was it that she was carrying on this adulterous relation with this man; was it before or after the separation?

A. After they had separated.

Mary Veney.

24 Q. During what period of time was it that this adulterous relation was being carried on between the two of them.

A It was before last Christmas and after last Christmas. 1922.

25 Q. And you say that it was after the separation between the parties to this suit?

A. Yes.

26 Q. Has the Defendant lived or cohabited with his wife since he discovered her adulteries with this man Scott?

A. No sir.

27 Q. Has he lived or cohabited with her since September 1922 when they separated?

A. No.

28 Q. Has he forgiven or condoned her offense in any way?

A. No sir. I guess not, by not being with her; I know that he does not live with her.

29 Q. And he has not lived with her since September 1922, has he?

A. I have never seen him with her.

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
Mary J. Verney

John Veney, a witness of lawful age, produced on behalf of the Plaintiff, having been first duly sworn, deposes and saith as follows, that is to say:

By the Examiner:

1 Q. State your name residence and occupation?

A. John Veney, 748 Ryan Street; I work as a laborer.

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

Q. Yes.

By Mr. King:

1 Q. Are they husband and wife

A. Yes.

2 Q. Did they live together as husband and wife and were they always known and recognized in the community in which they lived as husband and wife?

A. Yes.

3 Q. Has the Plaintiff been a resident of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit?

A. Yes.

4 Q. Are there any children as the result of this marriage?

A. No.

5 Q. What was his conduct towards his wife while living together; how did he treat her?

John Venev.

A. He treated her all right as far as I know of.

6 Q. State whether or not in your opinion he was always a kind, affectionate and faithful husband?

A. Yes.

7 Q. Are the parties to this suit living together now?

A. No sir.

8 Q. Which left the other; did he leave her or did she leave him?

A. She left him.

9 Q. When?

A. Well, I do not know exactly the correct date; it was last Fall.

10 Q. Do you mean the Fall of 1922?

A. Yes.

11 Q. He has testified that it was about September 1922; is that true; was it about that time?

A. Yes; I think so.

11 Q. Mr. Greer has charged his wife with adultery; do you know anything personally about that?

A. Well, as far as I know, I know that Scott goes with her; I saw him with her often.

13 Q. Where?

A. Around her house and on the street together.

14 Q. What was his conduct with her in the house while you was there?

John Veney.

A. I saw them sitting down and talking and they would do the same as we and my wife would do.

15 Q. Did you ever see him fondle this woman Mrs. Greer; did you ever see him hug and kiss her?

A. Yes.

16 Q. Often?

A. Yes.

17 Q. What other conduct did you observe between them,

A. Well, they would go upstairs together.

18 Q. And how long would they stay upstairs?

A. Well, I have seen them go upstairs on a Sunday evening, and they would stay up there a right smart while, and I would not see them any more until the next day.

19 Q. And what room would they go to.

A. Well, they would be in the front second story room, as far as I know; when me and my wife went to bed they would lean out the window and talk to us, and that was her front bed room that she was leaning out of.

20 Q. You say that you saw them go upstairs, and at times you would see them leaning out of the front bed room window together?

A. Yes.

21 Q. Did you ever hear Mrs. Greer have any conversation with your wife or did she have any conver-

John Veney.

sation with you about this man Scott.

A. Well, I heard her tell my old lady that Scott was her friend.

22 Q. And did she or not in these conversations admit her adulteries with Scott to your wife?

A. I did not hear her say that she had dealings with him, but I heard her say that he spent the night with her, but the rest of it she did not say before me, of course, but she said it to my wife, but I saw her poking her head out of the window with nothing but a gauze shirt on, as far as I could see, and he was laying out the window with her.

23 Q. And during what time was this adulterous intercourse carried on between the two of them.

A. It was last Summer.

24 Q. Was it prior to September 1st., 1923.

A. It was about the time of water melons.

25 Q. Then will you state whether or not it was prior to September 1923, or not.

A. Yes; it was; I saw it before last Christmas and after last Christmas.

26 Q. And it was after the separation between the parties to this suit?

A. Yes.

John Veney.

27 Q. Has Mr. Greer lived or cohabited with his wife since he discovered her adulteries?

A. No sir.

28 Q. Has he lived or cohabited with her since September 1922?

A. No sir.

28 Q. Has he forgiven or condoned her offense in any way?

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. ---

Yes

Yes

*John Wiley
man*

Test
W. H. M. L. G. G. G.

William Greer, the Plaintiff in this case, produced on his own behalf, having been first duly sworn, deposeseth and saith as follows, that is to say:

By the Examiner:

- 1 Q. State your name residence and occupation?
A. William Greer, 147 Boyd Street; laborer.
2 Q. Do you know the parties to this suit?
A. I am the Plaintiff and my wife is the Defendant.

By Mr. King:

- 1 Q. When were you married?
A. March 27th., 1921.
2 Q. Were you married by a Minister of the Gospel?
A. Yes.
3 Q. In Baltimore City?
A. Yes.
4 Q. By a Religious Ceremony?
A. Yes.
4 Q. Have you been a resident of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit?
A. Yes.
6 Q. Are there any children as the result of this marriage?
A. No.

William Greer.

7 Q. What was your conduct towards your wife while living together.

A. My conduct was good.

8 Q. State whether or not you were always a kind, affectionate and faithful husband?

A. Yes.

9 Q. Are you and your wife living together now?

A. No sir.

10 Q. Which left the other; did you leave him - did you leave her or did she leave you?

A. She left me.

11 Q. When?

A. September 1922.

11 Q. You have charged your wife with adultery; do you know anything personally about that?

A. I saw her on the streets with this man when she left me; that is all I know.

12 Q. What man do you mean, - Scott?

A. Yes.

13 Q. You do not know anything personally of her adulteries, do you?

A. No sir; only to see her on the street and going into the house.

14 Q. Have you lived or cohabited with her since September 1922?

A. No sir.

William Greer.

15 Q. Have you lived or cohabited with her since you discovered her adulteries?

A. No sir.

16 Q. Have you forgiven or condoned her offense in any way?

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.

No

Will Green

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.....*14th*..... day of *January*..... in the year of Our Lord nineteen hundred and *twenty-three*..... at the City of Baltimore, in the State of Maryland.

A. de Russey Sappington (SEAL).
Examiner.

There are.....*one*..... Exhibits with these depositions, to wit:

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

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

A. de Russey 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....., and on.....*none*..... by the Defendant.....

A. de Russey Sappington
Examiner.