

In Account of
for 842
Rachman's Deb

Allen Walbrook

vs

Renee Walbrook

Recd for Duane J. Vucilo
a Vucilo

Mr. Clerk please file

(Signature)

B 20.391

(17)

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BALTIMORE, MD

Ad 15 December 1919

Allen W. Holbrook

In The Circuit Court

vs.

of

Lennie Holbrook

Baltimore City.

To The Honorable, The Judge of Said Court:

Your Orator, complaining, respectfully says:

FIRST, That the parties hereto were married on or about November 4th. 1904 by Rev. Martin at Oriole Maryland and lived together as man and wife until on or about the 15th. day of January, 1917. Said marriage occurred in the State of Maryland.

SECOND, That Your Orator is a resident of the city of Baltimore, state of Maryland, and has been for more than two years prior to the filing of this bill of complaint. That the respondent is a resident of the State of Maryland.

THIRD, That though the conduct of your orator towards his wife has always been kind and affectionate and above reproach, she without just cause or reason abandoned your Orator to live in adultery with lewd and abandoned men whose names are unknown to your orator; has on divers days and times committed a crime of adultery with divers other men whose names are unknown.

FOURTH, That Your Orator has not lived with the said Lennie Holbrook, since he discovered the said adultery, nor has he condoned the said adultery.

FIFTH, That there are four children born as result of said marriage, the custody of one, Jayson Holbrook your Orator request.

-a- A divorce a vinculo matrimonii from the respondent.

-b- Such other and further relief as the case may require.

May it please Your Honor to grant unto Your Orator a Writ of Subpoena, directed unto the said defendant, commanding her to be or to appear in this court on some day certain therein named and perform such decree as may be passed in the premises.

As in duty bound etc.

Allen W. Holbrook

Complainant

John J. Davis

Solicitor for Complainant

State of Maryland)
) To Wit
Baltimore City)

I hereby certify that on this ^{13th} day of ~~Dec~~ 1919, before me the subscriber, a Notary Public in and for the city of Baltimore, State of Maryland, personally appeared Allen W. Holbrook, the complainant in the foregoing bill and made oath in due form of law that the matter contained therein was true to the best of his knowledge and belief.

Thomas J. Rowke

Notary Public.
NOTARY PUBLIC
COMMISSION EXPIRES, MARCH 12TH 1921

Received 23rd day of Dec 1919
and forthwith delivered to the Sheriff of
Somerset County.

Test: W. J. Stirling
Clerk.

Summons & copy

apt

D. N. Lawson

Shuff

pes 40

842 B59

Ct. Ct.

1919

No.

Docket

Halbrooks

Halbrooks

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B 20 391

Filed 13 Jan 1920

J. Steward Cars

Solicitor

EQUITY SUBPOENA

The State of Maryland

To

Lenne Holbrook

Of *Somerset* County, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said city, on the Second Monday of *January* 19 *20* to answer the complaint of

Allen W. Holbrook

against you in said Court exhibited.

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 *10* day of *November* 19 *19*

Issued the *15* day of *December* in the year 19 *19*

Clark Whiteford
Clerk

842 B59 Ct. Ct.
1919 Docket

Oelden Halbrook

vs.

Bernie Halbrook

Decree Pro Confesso.

CPM
13 20391

No.

(3)

Filed 29 Jan 1920

Allen Hulbrook

vs.

Gertrude Hulbrook;

IN THE
Circuit Court
OF
BALTIMORE CITY.

January

Term, 1920

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 29th day of January in the year nineteen hundred and twenty 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 said 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.

Robert F. Stanton

Pennsylvania
STATE OF ~~MARYLAND~~,
City of Philadelphia ~~BALTIMORE CITY~~, SCT :

I hereby certify that on this 16th day of January 1920 before me, the subscriber, a Notary Public, of the State of Maryland, in and for the City aforesaid, personally appeared *Allen Hulbrook* and made oath in due form of law that her (his) ~~husband~~ (wife) the defendant in the above entitled case is not in the Military or Naval service of the United States Government, to the best of ~~her~~ (his) knowledge, information and belief.

As Witness my hand and Notarial Seal.

x *Allen W. Hulbrook*

Thomas J. ...
NOTARY PUBLIC
COMMISSION EXPIRES, MARCH 12TH 1921
Notary Public.

IN THE CIRCUIT COURT OF BALTIMORE
CITY.
DOCKET 59-B, FOLIO 842.
No. B-20391.

ALLEN W. HOLBROOK,
PLAINTIFF,

VS.

LENNIE HOLBROOK,
DEFENDANT.

PETITION FOR ORDER
TO VACATE DECREE, AND
ORDER OF COURT THEREON.

B 20391

(4)

Mr. Clerk,
Please file.

Ronaldus
Solicitor for Petitioner.

Ad 18 July 1920

| | | |
|--------------------|---|----------------------------------------|
| ALLEN W. HOLBROOK, |) | IN THE CIRCUIT COURT OF BALTIMORE CITY |
| PLAINTIFF, |) | |
| VS. |) | DOCKET 59-B, FOLIO 842, |
| LENNIE HOLBROOK, |) | NO.B-20391. |
| DEFENDANT. |) | |

TO THE HONORABLE JUDGE OF SAID COURT:

The petition of Linnie Holbrook the defendánt in the above entitled case, respectfully shows:

FIRST: That her name has been misspelled in the Bill of Complaint in this case, her true name being Linnie,

SECOND: That the Bill of Complaint in this case was filed December 15th, 1919, and your defendant who resides with her small children at Venton in Somerset County, Maryland, about six miles from the railroad station was summoned to appear in this suit on the twelfth day of January 1920, but being unfamiliar with court procedure thought she had to come personally to the Court, but burdened with the care of her family, your Petitioner was unable to come to Baltimore until today, when she found that on January 29, 1920, a decree pro confesso had been entered against her in this case and that by the same decree the papers in the case were referred to an Examiner to take testimony.

THIRD: That your Petitioner is unjustly charged with adultery in the Bill of Complaint and has a valid defense which she desires to interpose.

Wherefore she prays that the said decree pro confesso and reference to an Examiner dated January 29, 1920, may be vacated and annuled, and that she may be permitted to answer said Bill of Complaint within ten days and that her name may be corrected to read Linnie instead of Lennie.

And as in duty bound, etc.

Geraldus Bell
Solicitor for Petitioner.

Linnie Holbrook
Petitioner.

I hereby certify that on this 17th day of February 1920, before me personally appeared Linnie Holbrook, and 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.

Geraldus Bell
Notary Public in and for
Baltimore City.

Consent is hereby given to the passing of an order as prayed in the foregoing petition.

(Allen W. Holbrook)
Attorney for Plaintiff
Allen W. Holbrook.

On this 18th day of February 1920, by Circuit Court of Baltimore City, it is ordered as prayed in the foregoing petition.

Robert F. Stanton

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

DOCKET 59-B, FOLIO 842.

NO.B-20391.

ALLEN W. HOLBROOK,
PLAINTIFF,

VS.

LINNIE HOLBROOK,
DEFENDANT.

A N S W E R .

B 70 391

Mr. Clerk:

Please file *(5)*

Geraldus

Solicitor for Defendant.

A 18 July 1920

ALLEN W. HOLBROOK,
PLAINTIFF,

VS.

LINNIE HOLBROOK,
DEFENDANT.

) IN THE CIRCUIT COURT OF BALTIMORE
CITY
)
) DOCKET 59-B, FOLIO 842,
)
) NO.B-20391.
)

TO THE HONORABLE JUDGE OF SAID COURT:

The answer of Linnie Holbrook, the defendant, filed by leave of the Court, to the Bill of Complaint against her exhibited in this case, says:

FIRST: Answering the first paragraph of the Bill of Complaint this defendant says that she and the plaintiff were married November 4, 1905, by Reverend L. H. Martin at Oriole, Somerset County, Maryland, and they lived together as husband and wife until the last part of April, nineteen hundred and fifteen (1915).

SECOND: Answering the second paragraph of said Bill of Complaint this defendant ~~reiterates~~ admits the allegations .

THIRD: Answering the third and fourth paragraphs of the Bill of Complaint this defendant indignantly denies the allegations that she has been guilty of adultery.

FOURTH: Answering the fifth paragraph of the Bill of Complaint this defendant says that there are five children as the result of said marriage born to her and the said plaintiff, and further says that the welfare of said children requires that they all be in her custody.

And having thus fully answered this defendant prays to be hence dismissed with her costs.

Linnie Holbrook
Defendant.

Geraldus Kies
Solicitor for Defendant.

I hereby certify that on this 17th day of February 1920, before me personally appeared Linnie Holbrook, the above named defendant, and made oath that the matters and facts set forth in the foregoing answer are true to the best of her knowledge and belief.

Geraldus Kies
Notary Public in and for Baltimore
City.

3/12/12/90

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

DOCKET 59-B, FOLIO 842.
NO.B-20391.

ALLEN W. HOLBROOK,
PLAINTIFF,
VS.

LINNIE HOLBROOK,
DEFENDANT.

PETITION FOR COUNSEL FEE.

B 20 391
Mr. Clerk:

(6)
Please file.

Waldwick
Solicitor for Petitioner.

fd 18 July 1920

| | | | |
|----------------------------------|---|---|------------------------------------|
| ALLEN W. HOLBROOK, PLAINTIFF, |) |) | |
| VS. |) |) | |
| LINNIE HOLBROOK, DEFENDANT. |) |) | ORIGINAL BILL |
| |) |) | IN THE |
| LINNIE HOLBROOK, PLAINTIFF, |) |) | CIRCUIT COURT OF BALTIMORE CITY |
| VS. |) |) | DOCKET 59-B, FOLIO 842. |
| ALLEN W. HOLBROOK, DEFENDANT. |) |) | NO.B-20391. |
| |) |) | |

TO THE HONORABLE JUDGE OF SAID COURT:

The petition of Linnie Holbrook respectfully shows:

FIRST: That she is the defendant in the original bill for absolute divorce, and the plaintiff in the cross bill for absolute divorce, in this case filed.

SECOND: That she is without means to properly defend and protect her rights in this case.

THIRD: That your Petitioner, and the said Allen W. Holbrook, have five children, who have always lived with your Petitioner, and your Petitioner and said children are entitled to support and maintenance from said Allen W. Holbrook pendente lite, permanent support having been prayed in said cross bill of complaint.

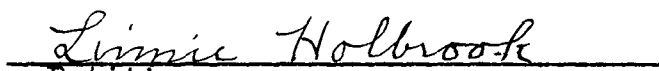
FOURTH: That your Petitioner is informed and believes and therefore charges that the said Allen W. Holbrook is now earning at least Thirty Dollars per week.

Wherefore your Petitioner prays:

That the said Allen W. Holbrook may be ordered and directed to pay your Petitioner a reasonable sum per week pendente lite, for the support of herself and her five children, and further pay her Solicitor, Gerald W. Hill, Esq., a reasonable counsel fee on account of his professional services to her in this case.

And as in duty bound, etc.

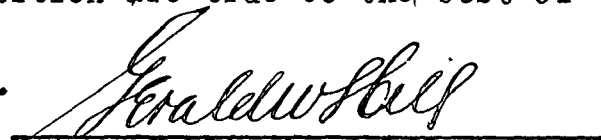

Solicitor for Petitioner.


Petitioner.

STATE OF MARYLAND, BALTIMORE CITY, TO WIT:

I hereby certify that on this 17th day of February 1920, personally appeared Linnie holbrook, and 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.


Notary Public in and for
Baltimore City.

IN THE CIRCUIT COURT OF
BALTIMORE CITY.
DOCKET 59-B, FOLIO 842.
No. B-20391.

ALLEN W. HOLBROOK,
PLAINTIFF,

VS.

LINNIE HOLBROOK,
DEFENDANT.

CROSS BILL.

B 20 391

Mr. Clerk:

(4)
Please file.

Gerald W. King
Solicitor for Plaintiff.

At 18 July 1920

| | | |
|--------------------|---|-------------------|
| ALLEN W. HOLBROOK, |) |) |
| PLAINTIFF, |) |) |
| VS. |) |) |
| LINNIE HOLBROOK, |) | ORIGINAL BILL. |
| DEFENDANT. |) |) |
| ----- |) |) |
| LINNIE HOLBROOK, |) | IN THE |
| PLAINTIFF, |) |)CIRCUIT COURT OF |
| VS. |) | CROSS BILL. |
| ALLEN W. HOLBROOK, |) |)BALTIMORE CITY |
| DEFENDANT. |) |) DOCKET 59-B, |
| |) | FOLIO 842. |
| |) |) NO.B-20391. |

CROSS BILL.

TO THE HONORABLE JUDGE OF SAID COURT:

Your Oratrix complaining says:

FIRST: That your Oratrix and Allen W. Holbrook, the defendant in the Cross BILL were married on or about November 4, 1905, at Oriole, in Somerset County, Maryland, by Reverend L.H. Martin, a Minister of the Methodist Episcopal Church, and they resided together as husband and wife in Somerset County, Maryland, until the latter part of April in the year nineteen hundred and fifteen (1915).

SECOND: That since her said marriage your Oratrix has resided in Somerset County, Maryland, and still resides there with the five children born to her and said defendant, Allen W. Holbrook, as the result of the said marriage; the names of said children being Hyacinth/Vaughn Holbrook, who will be twelve years of age on March 7th, 1920; Mildred Elmira Holbrook, about nine and one-half years old; Harold Jason Holbrook, now about six years old; and Walter Rosedale Holbrook, now over four years old, and Linnie Gertude Holbrook, about eight and one half years old.

THIRD: That in the latter part of April in the year nineteen hundred and fifteen (1915) said Allen W. Holbrook, deliberately and without just cause or excuse abandoned and deserted your Oratrix, in Somerset County, Maryland, aforesaid, and he came to reside in Baltimore City, where your Oratrix is informed he has since resided and still resides: and your Oratrix alleges that said abandonment is absolute, final and without hope of reconciliation.

FOURTH: That your Oratrix has always behaved herself as a kind, chaste and affectionate wife.

FIFTH: That your Oratrix and said children are in need of provision for support and maintenance from said Allen W. Holbrook.

To the end therefore:

- (a) That your Oratrix may be divorced a vinculo matrimonii from the defendant, the said Allen W. Holbrook.
- (b) That your Oratrix may be awarded the care and custody of all of the said five children.
- (c) That the said Allen W. Holbrook may be decreed to provide your Oratrix ^{and said children} with reasonable support and maintenance.
- (d) And for such other and further relief as her case may require.

And may it please your Honor to grant unto your Oratrix the writ of subpoena directed to the said Allen W. Holbrook commanding him to be and appear in this Court on some day certain to be therein named to answer this Cross Bill and abide by and perform such decree as may be passed in the premises

And she will ever pray.


Gerald W. Hill
Solicitor For Plaintiff.

Linnie Holbrook
Plaintiff.

STATE OF MARYLAND, BALTIMORE CITY, TO WIT:

I hereby certify that on this 17th day of February 1920, before me personally appeared Linnie Holbrook, and made oath in due form of law that the matters and facts above set forth are true to the best of her knowledge and belief.

WITNESS my hand and Notarial Seal.


Notary Public in and for Baltimore City.

Ct. Ct.

191

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed

191

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

On

Allen W. Holbrook.



of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said City, on the second Monday of *April* 19*20* to answer the ^{*cross bill of*} complaint of

Linnie Holbrook.

against you in said Court exhibited.

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 *5th* day of *March* 19*20*

Issued the *10* day of *March* in the year 19*20*

Clara B. Whiteford

Clerk.

Notice to the person summoned:

“Personal attendance in Court on the day named in the above writ is not required; but unless within such number of days thereafter as the law limits, legal defence is made in the above mentioned suit a Judgment by default may be entered against you.”

Docket

Circuit Court

vs.

Order Counsel Fee and Alimony

Pendente Lite

No.

Copy.

Allen W. Holbrook

vs.

Linnie Holbrook

-IN THE-
CIRCUIT COURT

-OF-

BALTIMORE CITY

Jan. TERM 1920

ORDERED BY THE COURT this 19th day of February 1920

that the Plaintiff Allen W. Holbrook

pay to the Defendant Linnie Holbrook

the sum of Twenty Two Dollars as Counsel Fee for the

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

Dollars per week, during the continuance of this suit, to the said Defendant Linnie Holbrook

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 5th

day of March 1920, provided a copy of this Order be served on the said Plaintiff

Allen W. Holbrook on or before the 27

day of February 1920

Robert F. Stanton

TRUE COPY—TEST:

Chas R. Whiteford
CLERK

544
B59

gfr

Ct. Ct.

1919

Docket No.

will remain office
Halbrooks
Halbrooks

~~cross~~
SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

30391

(8)

Filed

8 March 1919

Gerald W. Hill SOLICITOR

B

Now Est. Thomas G. Mc Mully
Sheriff

EQUITY SUBPOENA

The State of Maryland

On

Allen H. Halbrook

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said City, on the second Monday of *March* 19*40*, to answer the complaint of *or cross file of*

Linnie Halbrook

against you in said Court exhibited.

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 *12* day of *January* 19*40*

Issued the *18* day of *February* in the year 19*40*

Clerk.

Notice to the person summoned:

Chas. R. Whiteford
"Personal attendance in Court on the day named in the above writ is not required; but unless within such number of days thereafter as the law limits, legal defence is made in the above mentioned suit a Judgment by default may be entered against you."

Ct. Ct.

191

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT.

No.

Filed 191

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

On

Allen H. Halbrook



of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said City, on the second Monday of *March* 19*20* to answer the complaint of *Crosbie J.*

Linnie Halbrook

against you in said Court exhibited.

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 *12* day of *January* 19*20*

Issued the *18* day of *February* in the year 19*20*

Chas. R. Whiteford

Clerk.

Notice to the person summoned

"Personal attendance in Court on the day named in the above writ is not required; but unless within such number of days thereafter as the law limits, legal defence is made in the above mentioned suit a Judgment by default may be entered against you."

593 Docket 842
1919

Circuit Court

Halbrooks

vs.
Halbrooks

Order Counsel Fee and Alimony

Pendente Lite

No. 20391

\$200 a week
(9)

fd 19 July 1920

Non Est
Thomas J. McShelby
Sheriff

Allen H. Halbrook

-IN THE-
CIRCUIT COURT

vs.

-OF-

BALTIMORE CITY

Linnie Halbrook

Jan TERM 1920

ORDERED BY THE COURT this 19th day of February 1920

that the Plaintiff Allen H. Halbrook

pay to the Defendant Linnie Halbrook

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

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

Dollars per week, during the continuance of this suit, to the said Defendant Linnie Halbrook

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 5

day of March 1920, provided a copy of this Order be served on the said Plaintiff

Allen H. Halbrook on or before the 27

day of February 1920

Robert F. Stanton

TRUE COPY—TEST:

CLERK

25 LK
Phila

42 B 39 Ct. Ct.

191 Docket No.

Holbrook
vs
Holbrook

Cross
SUBPOENA TO ANSWER BILL OF COMPLAINT
Pro

No. B 20391
(10)

Filed 12 June 1920.

Ernest Hill SOLICITOR
SP 1947 B

Now Est. Thomas J. McAnulty
Shurtz

EQUITY SUBPOENA

The State of Maryland

To

Allen W. Holbrook

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said City, on the second Monday of *April* 19*20*, to answer the ^{*Cross Bill of*} complaint of

Lennie Holbrook

against you in said Court exhibited.

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 *8th* day of *March* 19*20*

Issued the *10* day of *March* in the year 19*20*

Robert P. Whiteford

Clerk.

Notice to the person summoned:

“Personal attendance in Court on the day named in the above writ is not required; but unless within such number of days thereafter as the law limits, legal defence is made in the above mentioned suit a Judgment by default may be entered against you ”