

B 568/1921

IN THE CIRCUIT COURT #2 OF
BALTIMORE CITY.

BEATRICE LANCASTER,

v.

OLIVER LANCASTER.
Baltimore City Jail.

"Bill & Order Court"

Mr. Clerk:

Please file, etc.

H. B. Wolf
Solicitor for plaintiff.

No 21095 B
1

HARRY B. WOLF
ATTORNEY AT LAW
110-112 E. LEXINGTON ST.
BALTIMORE, MD.

Ed 20 December 1921

BEATRICE LANCASTER,

*

v.

*

IN THE CIRCUIT COURT #2 OF

*

BALTIMORE CITY.

*

OLIVER LANCASTER.

TO THE HONORABLE, THE JUDGE OF SAID COURT;

YOUR ORATRIX COMPLAINING SAYS;

(1)

That on the 19th. day of June, 1910, she was married to her husband, Oliver Lancaster, with whom she resided until the 7th. day of October, 1921.

(2)

That the defendant has been a resident of the City of Baltimore, State of Maryland, for more than two years preceding the filing of this, Bill of Complaint.

(3)

That there are three children as issue of said marriage, viz., Beatrice, age 10 years, Myrtle, age 11 years and Elizabeth, age 5 years.

(4)

That your oratrix has always behaved herself as a kind, chaste and affectionate wife.

(5)

That, though the conduct of your oratrix towards her husband, the said Oliver Lancaster, has always been kind, chaste and above reproach, he, the said Oliver Lancaster, has, without any just cause or reason, abandoned and deserted her and has been guilty of the crime of adultery with divers lewd and abandoned women whose names are to your oratrix unknown.

(6)

That your oratrix has not lived nor cohabited with her husband, the said Oliver Lancaster, since she discovered his said adulteries.

(7)

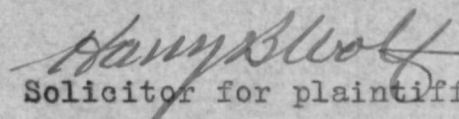
That her husband, the said Oliver Lancaster, is capable of earning at least \$25. per week, while your oratrix is wholly destitute of means of supporting herself and their three minor children during the pendency of this suit or of defraying the costs and expenses thereof.

To the end therefore:

- (a) That your oratrix may be divorced a Vinculo Matrimonii, from her husband, the said Oliver Lancaster.
- (b) That your oratrix may be awarded the care and custody of the three minor children, Beatrice, Myrtle and Elizabeth Lancaster.
- (c) That in the meantime the said Oliver Lancaster, her husband, may be required to pay to your oratrix a reasonable sum for her support and maintenance and for the support and maintenance of their three minor children during the pendency of this suit, and any sums of money as may enable your oratrix to employ counsel to prosecute this suit and to defray the necessary costs and expenses thereof.
- (d) That your oratrix may be declared to be entitled to receive by way of permanent alimony such an allowance of her husband's estate as may be proportionate to his earnings and station in life.
- (e) That your oratrix may have such other and further relief as her case may require.

May it please Your Honor to grant unto your oratrix the writ of subpoena directed to the said Oliver Lancaster, defendant, who is a resident of the City of Baltimore, commanding him to be and appear in this Court in person or by solicitor on some certain day to be named therein to show cause, if any he may have, why a decree ought not be passed as prayed.

And as in duty, etc.,


Solicitor for plaintiff.

Beatrice Lancaster

STATE OF MARYLAND,

CITY OF BALTIMORE, To Wit:

~~I HEREBY CERTIFY~~, That on this 19th. day of December, 1921, before me, the subscriber, a Notary Public in and for the State and City aforesaid personally appeared Beatrice Lancaster, 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.

As witness my hand and Notarial Seal.

Frank J. Schuster
Notary Public.

76
Ct. Ct. No. 2

568
1921
Docket No. 3

Lancaster

vs.

Lancaster

Subpoena to Answer Bill of Complaint

Pro

No. 21095B
2

Copy = kept

Filed 23 December, 1921
Harry B Kay
Solicitor.

4

Summoned and a copy of the process left
with the defendant.

Thomas F. McQuilty
Sheriff

(Recd) 12/21/21
Fees \$0.80

EQUITY SUBPOENA
The State of Maryland

To

Oliver Lancaster
Baltimore City Jail

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 *January*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Beatrice Lancaster

against you exhibited in the CIRCUIT COURT NO. 2 OF BALTIMORE CITY.

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

WITNESS, the Honorable ^{JAMES P. GOSPEL} MORRIS A. HOPER, Chief Judge of the Supreme Bench of Baltimore City, the *14* day of *November*, 1921

Issued the *20* day of *December*, in the year 1921

John Pleasant
Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

SERVE ON

Defendant
Ball City Jail

B *568/* Docket *31*
1921

Circuit Court No. 2

Laucaster

vs.

Laucaster

Order Counsel Fee and Alimony
Pendente Lite

ORDER *20 Dec 1921*

No. *21095* B.
3

Copy 11 Desped

Filed *20 Dec 1921* 19*21*

Copy of the within Order of Court served on
Oliver Laucaster on the 21st day of December,
1921. in presence of Edward P. Wolf.
Thomas J. McTully
Sheriff

Fee \$0.50

IN THE
CIRCUIT COURT No. 2

OF
BALTIMORE CITY

November TERM, 1921

Beatrice Lancaster

vs.

Oliver Lancaster

ORDERED BY THE COURT, this 20 day of December, 1921,

that the defendant Oliver Lancaster

pay to the plaintiff Beatrice Lancaster

the sum of nine

Dollars per week, during the continuance of this suit as Alimony, **pendente lite**, unless cause to the contrary be shown on or before the 6th

day of January, 1922, provided a copy of this Order be served on the said defendant

Oliver Lancaster on or before the 27th

day of December, 1921, the question of Counsel fee being reserved for the

further determination of this Court.

H. Arthur Stump

TRUE COPY—TEST:

\$25. per week
3 checks

Clerk.

D 568 B
1921 In the
Ch. Ct No 2 of
Baltimore City

Beatrice Lancaster

vs
Oliver Lancaster

Answer to Bill and
Petition and a
Demurer to 5th
Count of Bill

Yrs Clerk
Please file etc

U. Grant Tyler
Sol for Defendant

76 21095. B
H

Id 3. January 1922

BEATRICE LANCASTER	#	IN THE
	#	
VS.	#	CIRCUIT COURT NO. 2. OF
	#	
OLIVER LANCASTER	#	BALTIMORE CITY.
	#	

To the Honorable, the Judge of the aforesaid Court:-----

The respondent, Oliver Lancaster, defendant in the above entitled cause, respectfully represents unto this honorable Court:--

1.

That he admits the marriage of the defendant in the above entitled cause with the plaintiff herein named as alleged.

2.

That he admits the defendant has been and is a resident of the State of Maryland and the city of Baltimore for more than two years prior to the filing of the bill of complaint herein .

3.

That we admit that there are three children, Myrtle, age 11 years, Beatrice, age 10 years, Elizabeth, age 5 years, respectively.

4.

That we deny the plaintiff has been chaste, kind and affectionate and above reproach.

5.

"That the respondent or defendant, demurs to the fifth par-

agraph of the plaintiff's Bill, in that the paragraph contains two separate and distinct causes for a Divorce in the same paragraph: Contrary to the Rule of the Supreme Bench and ~~and~~ ^{against} the Rule of the Court of Appeals for the Circuit Courts of the state in such case made and provided.

6.

That on the seventh day of October, 1921, the plaintiff abandoned and deserted the defendant without just cause or excuse, ALTHO, the defendant was a dutiful husband towards his wife, and upon the solicitation of the defendant, the plaintiff returned, after he, the defendant had forwarded to her the sum of five dollars with which to return and upon her return, while he, the defendant was sick in bed, she the plaintiff upon a trumped up charge, (without the semblance of truth) had the plaintiff arrested and put in jail and while there, the plaintiff sold all his house hold goods including the furniture: which together they had given in pledge for the purpose of involving the said defendant criminally, while he the said defendant is incarcerated in the Baltimore City jail.

6 1/2.

That he the defendant specially denies he committed the crime of Adultery as alledged in her BILL FOR A DIVORCE.

7.

That he admits he is capable of earning twenty five dollars

per. week, but is unable now to earn twenty five cents, which unhappy situation was brought on by the mischievous and uncalled for doing of the plaintiff in this cause, without the knowledge or consent of the defendant and without just cause therefor, the defendant has not for quite a while been able to earn twenty five dollars per. week, and as he is now incarcerated he is unable to earn any stipulated sum and doubtless will be for some time yet to come, after he is freed from the Baltimore City jail; The defendant denies the plaintiff is destitute and without the means to defray the expenses in these proceedings; Because, he says, he left a seven room house furnished, the accumulations of their entire marriage of nearly twelve years and his wife has sold all the furniture and left him without where to lay his head or a place of shelter when he returns to freedom as the unwholesome result of her mischievous frame up upon him in this cause; He desires and is anxious and willing to forgive his wife and form a reconciliation between ourselves and begin life anew, he is willing, yet unable, made so by the aforesaid mischievous act of the plaintiff to care for and support his wife and children, whose condition has been made as it is by the uncalled for act of the plaintiff in this cause.

To the end therefore, your petitioner, prays, this Honorable court, in due time to dismiss her bill with her reasonable cost.

And as in duty bound and so forth.

Oliver Lancaster
Petitioner

U. Grant Tyler
Solicitor for Defendant.

State of Maryland #

To wit: --- #

Baltimore City #

#

This is to certify, that personally appeared before me the subscriber a notary Public, of the State of Maryland, in and for Baltimore City, Oliver Lancaster, this 3rd day of January, 1921, and made oath in due form of law, that the matters and facts stated are true to the best of his knowledge and belief and that the demurer here in filed is not filed for the purpose of causing delay in this cause.

U. Grant Tyler
Notary Public.

B 568 30
1921 In the
Circuit Court No 2
of
Baltimore City
Beatrice Lancaster
Oliver Lancaster
and
Oliver Lancaster
vs
Beatrice Lancaster

Cross-Bill

Mr. Clerk;
Please file etc

U. Grant Tyler,
Sol for Petitioner in
Cross-Bill

Serve Summons on Harry
B. Wolf, Sol for Beatrice
Lancaster, non-dependent

No 21095.B.
A.

Jan 9 January 1922

Gross-Bill

BEATRICE LANCASTER	#	
	#	
VS.	#	IN THE
	#	
OLIVER LANCASTER	#	
and	#	
	#	CIRCUIT COURT NO. 2. OF
OLIVER LANCASTER	#	
VS.	#	
BEATRICE LANCASTER	#	
	#	BALTIMORE CITY

To the Honorable, the judge of the aforesaid ct. Ct. No. 2. of Baltimore City:-----

The petition of Oliver Lancaster, plaitiff in the gross-Bill, herein filed, respectfully represents unto this Honorable Court

1.

That your petitioner heretofore has filed his answer to the petition of the plaintiff in the Original Bill for A Divorce A Vinculo Matrimonii from the defendant in the gross-Bill and plaintiff in the Original Bill filed in this cause, in which he denied fully and specifically the Charge of Adultery alledged therein.

2.

That on or about June, 19th., 1910, the petitioner and defendant herein named were married by a minister of the gospel and lived together till on or about October, 7th., 1921.

3.

That on or about October, 7th., 1921, the defendant abandoned the petitioner herein named without just cause or excuse and said abandonment continued, uninterrupted, was deliberate and final until the present time, January, day, 1922, yet the petitioner has made repeated overtures to effect a reconciliation with the defendant without avail and there seems to be no hope of a reconciliation between the parties to this cause.

4.

That the defendant is a non resident of the city of Baltimore and resides in the District of Columbia with her sister, while the plaintiff is and has been a resident of Baltimore City and State of Maryland for more than two years prior to his filing his bill for a divorce.

5.

That there are three children, Myrtle, age 11 years, Beatrice, age 10, years and Elizabeth, age five years, all and each are children of the parties herein named, who are in the custody of the mother who now resides in Washington, D.C. out of the Jurisdiction of this Honorable Court in the care and custody of the mothers sister, who is not a party to this cause, one of whom has been given to the

sister in law to raise by its mother, without my consent AND we aver and verily believe that the mother is not the proper person to raise the girl children, the reason will be more fully stated at the hearing of this cause.

6.

That at divers times and on divers occasions the defendant, Beatrice Lancaster, committed the Crime of Adultery and because of the fact that the children would need a mother's care, she the defendant has been forgiven and condoned, notwithstanding said forgiveness and condonation, she has ^{since} repeatedly committed the aforesaid crime of Adultery, without said condonation and forgiveness, with divers lewd and abandoned men; and to add new and further insult and injury she, the defendant herein named has sold all furniture of the petitioner presumable, to defray the expenses of her divorce case in th-is her divorce case filed, without regard to the welfare of her children and their comfort and interest: She did wilfully and wickedly prefer unfounded charges against said petitioner and wrongfully cause his arrest and incarceration in the Baltimore City Jail, thereby preventing him, the petitioner from caring for and supporting his minor children, as best his circumstances would permit him to do, which he ever intends to do, because, he says, the children are not in anywise responsible for the misunderstandings of their parents.

To the end therefore, your petitioner prays, Honorable Court to grant him:----

- (a). A Divorce A MENS A ET THORO, from the defendant, Beatrice Lancaster.
- (b). The Writ of subpoena directed to Harry B. Wolf (Solicitor for Beatrice Lancaster, being a non resident of Baltimore City and State of Maryland), notifying her, thru her Solicitor of record), to be and appear ~~in this~~ honorable court some day certain named therein to show cause, if any, she may have why, the relief prayed ought not be granted as prayed.
- (c). AND THAT THE CARE, CUSTODY AND MAINTENANCE, may be awarded to the plaintiff in the Cross-Bill. *of four children*
- (d/. AND such other and further relief as in equity the case may require.
- (e). And as in duty bound and so forth.

Beatrice Lancaster
Petitioner

U. Grant Tyler
Solicitor for Petitioner

STATE OF MARYLAND

TO WIT:-----

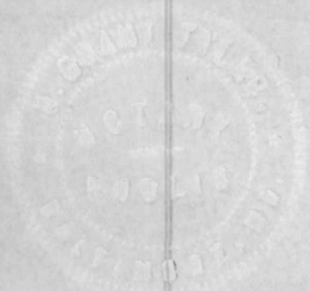
#

BALTIMORE CITY

This is to certify, that personally appeared before me, the su
subscriber, a Notary Public, of the State of Maryland, in and for
Baltimore City, this *3rd* day of January, 1922, Oliver Lancaster,
and made oath in due form of law that the matters and facts stated
are true to the best of his knowledge and belief.

U. Grant Tyler

Notary Public.





94

Ct. Ct. No. 2

568
1921

B Docket No. 30

Laucaster

vs.

Laucaster

Subpoena to Answer ^{cross} Bill of Complaint

Pro

No. 21095 B
6

Copy - copied

Filed 13 February, 1922
U Grant Tyler X
Solicitor.

F

Thomas F. Maulty
Sheriff

True Cert

EQUITY SUBPOENA
The State of Maryland

To

Beatrice Lancaster

Leave Subpoena with Harry B. Hoey Sub

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 *February*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Oliver Lancaster

against you exhibited in the CIRCUIT COURT NO. 2 OF BALTIMORE CITY.

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

JAMES P. GORTER

WITNESS, the Honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *9* day of *January*, 192*2*

Issued the *9* day of *January*, in the year 192*2*

John Pleasant

Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

Harry B Hall

No 15

Cir. Ct. No. 2

568
1921 B Docket No. 30

Gaucaster

vs.

Gaucaster

MOTION FOR HEARING

No. 21095 B

21095 9

Filed, 14 January 1922

W. Grant Lyell

Beatrice Gaucaster

vs.

Oliver Gaucaster

IN THE
Circuit Court No. 2

OF
BALTIMORE CITY

The *Plaintiff* by *Samuel Wolf*

per Solicitor, applies to have the above entitled cause placed in the

Trial Calender for hearing on *Order Court and Answer thereto.*

In conformity with the First Equity Rule.

Samuel Wolf
Solicitor for *Plaintiff*

Serve on

U Grant Tyler
Plaintiff

No 15

Cir. Ct. No. 2

528
1921

30 Docket No. B

Laucaster

vs.

Laucaster

NOTICE AS TO HEARING

No. 21095 B
8

Copy - copied

Filed 14 January, 1922

Copy of the within notice served on U Grant Tyler
Solicitor on the 18th day of January 1922 in
presence of Harry B Frank
Thomas F M Maulty
Sheriff
Fees \$ 0.50

Beatrice Lancaster

vs.

Oliver Lancaster

IN THE
CIRCUIT COURT, No. 2
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

Order Court read

Answer hereto

when reached in due course on the said calendar.

JOHN PLEASANTS,

Clerk Circuit Court No. 2.

MEMORANDUM
The State of Maryland



143

Ct. Ct. No. 2

568
192 4 B Docket No. 30

Lancaster

vs. 3/3/22

Lancaster

Subpoena to Answer ^{Copy} Bill of Complaint

Pr
12:30 P.M.

No. 21095 B

9

Copy = looped

Filed 8 March, 1922
G. Grant Tyler Solicitor.

B

Summoned and a copy of the Process left with the defendant.

Thomas J. M. Bully
Sheriff

(Pinkletter) 7/22/22
Recd \$0.80

MEMORANDUM

EQUITY SUBPOENA
The State of Maryland

To

Beatrice Lancaster

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 *March*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Oliver Lancaster

against you exhibited in the CIRCUIT COURT NO. 2 OF BALTIMORE CITY.

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

JAMES P. GORTER

WITNESS, the Honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *9* day of *January*, 192*2*

Issued the *20* day of *February*, in the year 192*2*

John Pleasants

Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

Ct. Ct. No. 2

568

1921

B

No.

30

Docket

Lancaster

vs.

Lancaster

Summons for Witness

No. 21095 B
10

Filed 10 day of March 1922

In the Circuit Court No. 2 of Baltimore City

January Term, 1922

The Sheriff will please summon the following witnesses,

returnable on Friday the 10th day of March 1922 at 10 o'clock A. M.

8 Beatrice Lancaster St
810 S Sharp St

to testify for Pearson

in the case of Lancaster

vs. Lancaster

John Pleasant
Clerk of Circuit Court No. 2 of Baltimore City.

Ct. Ct. No. 2

568
192 1 No. 37 Docket B

Laucaster

vs.

Laucaster

Summons for Witness

No. 21095 B
11

Filed 10 day of March 192 2

In the Circuit Court No. 2 of Baltimore City

March Term, 1922

The Sheriff will please summon the following witnesses,

returnable on 10th day of March 1922 the _____ day of

March 1922 at 12:30 o'clock AM.

To the Hopkins Savings Bank of Balto
Before his Honor Judge Stein
to bring with them a transcript
of the deposits and withdrawals
of Beatrice Lancaster

HEARING BETWEEN 12.30 AND 1.30 P. M.

to testify for

Oliver Lancaster

in the case of

Lancaster

vs.

Lancaster

John Pleasant

Clerk of Circuit Court No. 2 of Baltimore City.

SERVE ON

B ³⁶⁸⁷₁₉₂₁ Docket ³⁰

Circuit Court No. 2

Beatrice Lancaster

vs.

Oliver Lancaster

Order Counsel Fee and Alimony

Pendente Lite

ORDER

No. ²¹⁰⁹⁵₁₂ B.

Filed *10 March* 19*22*

Beatrice Lancaster

IN THE
CIRCUIT COURT No. 2

vs.
Oliner Lancaster

OF
BALTIMORE CITY

TERM, 19

ORDERED BY THE COURT, this *10th* day of *March*, 19*22*,

that the defendant *Oliner Lancaster*

pay to the plaintiff *Beatrice Lancaster*

the sum of *Six*

Dollars per week, during the continuance of this suit as Alimony, *dating* ~~unless cause to the~~
from December 20, 1921.
contrary be shown on or before the

~~day of _____, 19____, provided a copy of this Order be served on the said defendant~~
~~_____ on or before the _____~~

~~day of _____, 19____, the question of Counsel fee being reserved for the~~
further determination of this Court.

W. H. [Signature]

TRUE COPY—TEST:

Clerk.

Serve on

W 95 ✓ 10
568

Circuit Court No. 2

192 | Docket No _____

Beatrice Lancaster
vs.

Olin Lancaster

PETITION AND ORDER TO TAKE
TESTIMONY UNDER 35TH RULE.

No. 21096-B
13

Filed 10 March 1922

Beatrice Lancaster

VS

Olivier Lancaster

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

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

The Plaintiff in this case respectfully shows unto your Honor

That he desires to examine orally, in open Court and in the presence of your Honor, certain witnesses who can testify to the facts and matters relevant to the allegations in the Bill of Complaint filed in this case.

Your Petitioner therefore prays your Honor to pass an order, according to the Statutes for such cases made and provided

And as in duty bound will ever pray.

Harry B. Wolf

Solicitor for Plaintiff.

Upon the foregoing Petition and Application it is this 10th day of March

A. D. 1922, Ordered that the Petitioner have leave to take testimony as prayed and that the testimony to be offered be taken as required by the 39th Rule of this Court. ~~And it is further Ordered that a copy of this Petition and Order be served on the~~

or his ~~Solicitor~~, on or before the _____ day of _____, 192

Charles F. Stein

Serve on

Circuit Court No. 2

573

B

1921

Docket No 30

Beatrice Lancaster

vs

Oliver Lancaster and

vs.

Oliver Lancaster

vs

Beatrice Lancaster

PETITION AND ORDER TO TAKE
TESTIMONY UNDER 35TH RULE.

No. _____

Filed _____ 192

Faint handwritten notes and bleed-through from the reverse side of the page.

Faint handwritten notes and bleed-through from the reverse side of the page.

Beatrice Lancaster
vs
Oliver Lancaster
Oliver Lancaster
VS
Beatrice Lancaster

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

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

The Plaintiff in this case respectfully shows unto your Honor

That he desires to examine orally, in open Court and in the presence of your Honor, certain witnesses who can testify to the facts and matters relevant to the allegations in the Bill of Complaint filed in this case.

Your Petitioner therefore prays your Honor to pass an order, according to the Statutes for such cases made and provided

And as in duty bound will ever pray.

U. Grant Tyler

Solicitor for Plaintiff.

Upon the foregoing Petition and Application it is this 20th day of March

A. D. 1922, Ordered that the Petitioner have leave to take testimony as prayed and that the testimony to be offered be taken as required by the 35th Rule of this Court. And it is further Ordered that a copy of this Petition

and Order be served on the Defendant's
Solicitor, on or before the 20th day of March, 1922

Charles F. Sherr

Ct. Ct. No. 2

568
1927

No. 30 Docket B

Lancaster

vs.

Lancaster

Summons for Witness

No. 21095 B
14

Filed 15 day of March 1927

In the Circuit Court No. 2 of Baltimore City

March Term, 1922

The Sheriff will please summon the following witnesses,

returnable on Wednesday the 15th day of March 1922 at 10 o'clock A. M.

- 8 Ethel Dryer sd 621 Sharp Street 2nd floor,
- 8 Sorrenda Thomas sp 123 W. Hill Street,
- 14 Sampson Harris sd 1021 Carlton Street,
- 14 Laura Harris sd 1021 Carlton Street,
- 8 Peter Jennings sp 708 Shapp Street,
- 8 # Beatrice Lancaster sp 810 S. Sharp Street,

to testify for Beatrice Lancaster
in the case of Lancaster vs. Lancaster

John Pearson
Clerk of Circuit Court No. 2 of Baltimore City.



Ct. Ct. No. 2

568

1921

No. 3v Docket B

Lancaster

vs.

Lancaster

Summons for Witness

No. 21095 B

151

Filed 16 day of March 1922

In the Circuit Court No. 2 of Baltimore City

March Term, 1922

The Sheriff will please summon the following witnesses,

returnable on Thursday the 16 day of March 1922 at 12.30 ~~10~~ o'clock P. M.

8 Preston Joynes 8d 913 Leadenhall St

14 Laura Harris 8P 1021 St. Coarcton St

to testify for Defendant

in the case of Lancaster vs. Lancaster

John Beasants
Clerk of Circuit Court No. 2 of Baltimore City.



Ct. Ct. No. 2

568

192 |

No. 30 Docket B

Lancaster

vs.

Lancaster

Summons for Witness

No. 21095 B
16.

Filed 16 day of March 1922

In the Circuit Court No. 2 of Baltimore City

March Term, 1922

The Sheriff will please summon the following witnesses,

returnable on Immediately the _____ day of _____
1922 at _____ 10 o'clock A. M.

1 Officer Duane J.P.
Southern Police Station

to testify for _____
in the case of _____

Peasants
Lancaster
vs. Lancaster

John Pleasants
Clerk of Circuit Court No. 2 of Baltimore City.

B 592/1922

3/18/14/50

In the Circuit Court
#2 of Baltimore City.

Beatrice Lancaster
Oliver ^{vs} Lancaster
and
Oliver Lancaster
^{vs}
Beatrice Lancaster

Answer.

2/1095.13
Mr. Clerk
Please file, etc
Harry B Wolf
Solicitor for
Respondent

HARRY B. WOLF
ATTORNEY AT LAW
110-112 E. LEXINGTON ST.
BALTIMORE, MD.

16 March 1922

BEATRICE LANCASTER,
vs.
OLIVER LANCASTER,
and
OLIVER LANCASTER
vs.
BEATRICE LANCASTER.

IN THE CIRCUIT COURT
#2 OF BALTIMORE
CITY.

To the Honorable, the Judge of said Court:

The answer of Beatrice Lancaster, defendant in the cross bill filed in the above entitled cause, says:

1. That she admits the allegations contained in paragraph 1 of said cross bill respecting the filing of an answer by the complainant therein, to her bill filed in this cause.

2. That she admits the allegations contained in paragraph 2 of said cross bill.

3. That she admits that she left the plaintiff on or about October 7, 1921, but she avers that she left him because he had not provided for her and their said children's support, and because he spent most of his time in company with other women and in lewd living, and that this respondent was compelled to go to her sister-in-law's home in order to secure support for herself and her said children. That subsequent to her leaving the plaintiff in said cross bill he induced this respondent to promise to return to live with him, and that on or about December 18th, 1921, your respondent returned to the house which she and the plaintiff had occupied and discovered the plaintiff in said house in company with another woman under such circumstances as to cause your respondent to believe that her said husband had committed the act of adultery. That thereupon this respondent refused to live with the said plaintiff, and has not lived with him since.

4. That she denies the allegations contained in the 4th paragraph of said cross bill as to the residence of this respondent, and avers that she is a resident of Baltimore City, State of Maryland, and has been for more than two years prior to the filing of her bill of complaint in this cause.

5. That she denies emphatically the allegations contained in the 5th paragraph.

6. That she denies the allegations contained in the 6th paragraph.

Therefore having fully answered the said cross bill, this respondent prays hence to be dismissed with her proper costs.

Harry B. Wolf
Solicitor for
Respondent.

STATE OF MARYLAND, BALTIMORE CITY, to wit:

I HEREBY CERTIFY, that on this ^{16th} day of March, 1922, before me, the subscriber, a Notary Public of the State of Maryland, ~~in and for Baltimore City~~, personally appeared Beatrice Lancaster, and made oath in due form of law that the matters and facts set forth in the foregoing answer are true, to the best of her knowledge and belief.

As witness my hand and Notarial Seal.

Frank Schuster
Notary Public.

30 / 1922

IN THE CIRCUIT COURT #2
OF BALTIMORE CITY.

BEATRICE LANCASTER,

v.

OLIVER LANCASTER,
& Cross-Bill.

"D e c r e e"

R

*No 21095. B
17 1/2*

Copy sent to - Cooper

HARRY B. WOLF
ATTORNEY AT LAW
110-112 E. LEXINGTON ST.
BALTIMORE, MD.

Ad 23 March 1922

BEATRICE LANCASTER,

v.

OLIVER LANCASTER,

and

OLIVER LANCASTER,

v.

BEATRICE LANCASTER.

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*

IN THE CIRCUIT COURT OF ^{#2} OF
BALTIMORE CITY.

March Term 1922

The cause coming on for hearing, the Bill of Complaint, Answer, Cross-Bill of Complaint and Answer thereto were by the Court read and considered, and Testimony on behalf of the Plaintiff and Defendant having been heard in open Court, and by the Court fully considered;

It is thereupon by the Circuit Court ^{#2} of Baltimore City, This *23rd* day of March, 1922, Adjudged, Ordered and Decreed, that the plaintiff in the original Bill, Beatrice Lancaster, be and she is hereby divorced a Vinculo Matrimonii, from the defendant in the original Bill, Oliver Lancaster; and,---

It is further Adjudged, Ordered and Decreed that the care and custody of the three minor children, viz., Beatrice, Myrtle and Elizabeth Lancaster, be and they are hereby awarded to the plaintiff, Beatrice Lancaster, with the right on the part of the said Oliver Lancaster to see said children at reasonable times; and,---

It is further Adjudged, Ordered and Decreed that ^{amount} the said Oliver Lancaster, pay to the said Beatrice Lancaster, for the support and maintenance of the said three minor children, ~~the sum of \$~~

~~per week; and, --~~ *\$ 12.50 per week on Friday April 21, 1922*

It is further Adjudged, Ordered and Decreed that the said Beatrice Lancaster, be and she is hereby permitted to resume her maiden name; and,--

It is further

It is further Adjudged, Ordered and Decreed that the
Cross-Bill of Complaint in this cause, be and the same is hereby
dismissed; and---

It is further Ordered that the said Oliver Lancaster pay
the costs of these proceedings.

Charles T. Stone

Ct. Ct. No. 2 30 B. ⁵²⁸ 1921

Lancaster

vs.

Lancaster

Final Order, ~~Counsel Fee and Alimony~~

~~Pendente Lite,~~

No. ²¹⁰⁹⁵ B.
18.

Filed 21 April 1921

Beatrice Lancaster

IN THE

CIRCUIT COURT No. 2

vs.

Olive Lancaster

OF

BALTIMORE CITY.

~~The petition for Alimony pendente lite and Counsel fee and the answer thereto in the above entitled cause coming on for final hearing and the respective parties having been heard;~~

It is Ordered by the Circuit Court No. 2 of Baltimore City this 21st day

of April 1922, that the Defendant, Olive

Lancaster pay to the Plaintiff, through the Pruders Aid

Society the sum of 7.00 Dollars, as Counsel Fee

~~for the Solicitor of the~~ and that he

~~further pay the sum of~~ Dollars per week,

as permanent alimony during the continuance of this suit, to the said Beatrice Lancaster

~~as Alimony pendente lite~~ accounting from the 18th day of April 1922

until the further order of this Court.

Charles F. Stew



Account open
payments Center
Walter J. Damman

543
1925
Cir. Ct. No. 2.
D. No. 30

Lancaster
vs

Lancaster

Attachment in Equity.

John O. Lancaster
1108 N-mount St
~~1606 Apple - no~~
1510 Shields alley
Business place
No. 21095 B
19

Filed _____ day of _____ 191

Attached John E. Potee Sheriff

Sheriff's fees \$2.00
Clerk's " 1.00
\$3.00

1/8/1925

Cepo In Jail

John E. Potee

1/9/1925 - Lancaster and Sheriff released on costs.

Sheriff's costs - \$2.00
Clerk's costs - \$1.00
Total 1/9/1925 \$3.00

Darckem - Judge
John E. Potee
Sheriff

(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

Oleiver Lancaster

if he shall be found in your bailiwick, and h *im* safe keep, so that you have *him* before the

Judge of the Circuit Court No. 2 of Baltimore City, at the Court House in the same city, on ~~the~~

when day in apprehended 19 *24*, to answer as well touching a certain contempt by

him committed in not *obeying the order of this Court*

Release Correct

[Handwritten signature]

Clerk

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.

JAMES P. GORTER

WITNESS, The Honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Balti-

more City, the

10

day of

November

1924

Issued the

3

day of

January

1925

John Keasants

Clerk.

*Let the attachment issue
Peter S. Dawson*

SERVE ON

CT. CT. No. 2.

B-30
1921

John Oliver Saucaster
2361 Druitt Hill Ave

Beatrice Saucaster

VS.

Oliver Saucaster

ORDER OF COURT NISI
For Contempt

Order:

No. 21095 B.
20

Coyne = copied

Filed 26th August 1921

11

John E. Porter
Sheriff

Non Est
(by cut)

Beatrice Saucaster
vs.
Oliver Saucaster

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

Ordered by the Circuit Court No. 2 of Baltimore City this *26th* day of *aug* 1925 that the *defendant, Oliver Saucaster* appear before this Court in person, on the *31st* day of *August*, 1925, at 10 o'clock A. M., and then and there show cause, if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying the Order of this Court passed on the *21st* day of *April*, 1922 directing the payment of Alimony, pendente lite, by him to the *plaintiff*; provided, a copy of this Order be served on the said *defendant* on or before the *29th* day of *August*, 1925.

Charles H. Hester
Judge.

True Copy: Test

.....
Clerk.

*ordered to pay \$5⁰⁰ per week.
\$241⁰⁰ in arrears aug 21st 1925
Steward Davis.*

SERVE ON

CT. CT. No. 2.

B $\frac{30}{1921}$

Lancaster

vs.

Lancaster

**ORDER OF COURT NISI
For Contempt**

Order:

Copy

No. B.

Filed 192...

Beatrice Lancaster
vs.
Oliver Lancaster

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

Ordered by the Circuit Court No. 2 of Baltimore City this 26th day of Aug 1925
that the Defendant, Oliver Lancaster appear before this Court in person,
on the 31st day of August, 1925, at 10 o'clock A. M., and then and there show
cause, if any he may have, why he should not be punished for contempt of this Honorable Court
in not obeying the Order of this Court passed on the 21st day of April, 1925
directing the payment of Alimony, pendente lite, by him to the Plaintiff; provided, a
copy of this Order be served on the said Defendant on or before the 29th day
of August, 1925.

Charles F. Stein
Judge.

True Copy: Test
John Pleasant
Clerk.

#19748 N-W DIST.

Cir. Ct. No. 2.

593
1931

B

D. No. 30

Beatrice Lancaster

vs

Olinus Lancaster

Attachment in Equity.

No. 21095 B
21

Filed _____ day of _____ 191
Sgt Henry C. Moore
Off. Military Advocate
N. W. D.



(ATTACHMENT IN EQUITY.)

Steward Davis, Sol.

MARYLAND, SC.

The State of Maryland.

To the Sheriff of Baltimore City, Greeting:

YOU ARE HEREBY COMMANDED, that you attach the body of

Oliver Lancaster
1108 7/2 Mount St

if he shall be found in your bailiwick, and *h* safe keep, so that you have *h* before the Judge of the Circuit Court No. 2 of Baltimore City, at the Court House in the same city, ~~on the~~ *when apprehended* ~~day in~~ *19*, to answer as well touching a certain contempt by *h* committed in not *obeying an order of this Court*

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.

JAMES P. GORTER

WITNESS, The Honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Balti-

more City, the

14th

day of

September

19*25*

Issued the

2nd

day of

October

19*25*

Let the attachment issue *John Peasants* Clerk.
Robert J. Stanton

Circuit Court No. 2.

⁵⁹³
19 *24* *B*

Docket No. *30*

Lancaster

vs.

Lancaster

COMMITMENT.

To 21095 B
22

Copy kept

Fd. *19 October*, 19

10/13/1925

Lechi. - In Jail as per Order of Court
John T. Jotce,
Sheriff.

Beatrice Lancaster

vs.

Oliver Lancaster

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY,

The Defendant, Oliver Lancaster, having been brought before the Court

under the writ of attachment heretofore issued against him, as for a contempt, for his non-compliance with the order of this Court passed Conditionally on the 27th day of April, 1922, and made final on the 27th day of April, 1922, and being still in contempt for his non-compliance therewith, the Court being satisfied from the proof in the cause that he is able to comply with the said order; it is this 13th day of October, 1925,

ORDERED, by the authority of the Circuit Court No. 2 of Baltimore City, that the

said Oliver Lancaster pay the Costs of the attachment and stand committed

for a period of three months or to the custody of the Warden of the Jail of Baltimore City until he shall have purged the contempt

and the payment of the sum of \$261.00 the amount of delinquency by his compliance with the said order, and that the Sheriff of Baltimore City deliver the body of

the said Oliver Lancaster to the said Warden, together with a

copy of this order to be furnished by the Clerk of this Court

Robert F. Stanton

Lancaster

^{os}
Lancaster

No. 21995 Q

B21095

Balto. Md
Dec. 24, 1921

Dear Judge -

Will you please to
hold off case no. 568 until my
time expires in Feb. the 9th 1922
as i am in the Balto. City Jail
and i have charges to make
against Beatrice Lancaster
and have witness to prove it
and i am not willing
to let her have a divorce
until i see further into
the matter

Yours Truly
Oliver Lancaster

P.S. I am willing to give
her \$6⁰⁰ per week for support