

3/19/1/65

B473/1924

IN THE
CIRCUIT COURT NO. 2
OF
BALTIMORE CITY

GENEVIEVE MARSHALL

VS

EDWARD MARSHALL

BILL FOR DIVORCE
a mensa et thoro

MR. CLERK:-

Please file.

No 24,484 B

Hawkins & McMechen
SOLICITORS FOR PLAINTIFF.

HAWKINS & MCMECHEN
ATTORNEYS AT LAW
BANNEKER BUILDING, 14 E. PLEASANT ST.
BALTIMORE, MD.

FILED *3 October 1924*

GENEVIEVE H. MARSHALL) IN THE
VS) CIRCUIT COURT NO. 2
EDWARD MARSHALL,) OF
2015 Druid Hill Ave.) BALTIMORE CITY

To the Honorable, the Judge of said Court:

Your oratrix complaining says:

1. That she was married to her husband, Edward Marshall, on the 23rd day of July, 1923, at Washington City, District of Columbia, by the Rev. John W. Waters, a regularly ordained minister of the gospel, and that they resided together in Baltimore City till the 5th day of October, 1923.

2. That soon after their marriage as aforesaid, the said Edward Marshall, her husband, began to treat her with great cruelty, harshness and brutality, and within less than three months after said marriage, his conduct became so intolerable that she was obliged to leave his house, and return to the home of her parents.

3. That he has ever since by threats and violence, prevented her from returning to his house, and he has refused to permit her to live with him, or to provide a home for her and their infant child, and will not contribute adequately to her support, although he is fully able to do so, being employed in the United States Post Office of Baltimore City, and where he receives a salary of \$1800 per year.

4. That ever since their said marriage your oratrix has behaved herself as a faithful, affectionate and chaste wife towards the said Edward Marshall, and her conduct has always been above reproach.

5. That one child, Catherine E, aged eight months has been born of said marriage.

6. That your oratrix is wholly destitute of means of supporting herself and her infant during the pendency of this suit, or of defraying the costs and expenses attending the prosecution of the same.

To the end, therefore,

(1) That your oratrix may be divorced a mensa et thoro from the said Edward Marshall, her husband.

(2) That your oratrix may be declared to be entitled to receive, by way of alimony, such an allowance out of her said husband's earnings as may be proportioned to the means and station in life of her said husband.

(3) That in the meantime, the said Edward Marshall may be required to pay unto your oratrix a reasonable sum for her support and maintenance, and that of their infant child, during the pendency of this suit, and such sum or sums of money as may enable your oratrix to employ counsel to prosecute this suit and to defray the necessary costs and expenses thereof.

^{4. That your oratrix may have the care and custody of the infant child of said marriage.}
(5) 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 Edward Marshall commanding him to be and appear in this Court some certain day, to be named therein, and answer to the premises and abide by and perform such decree as may be passed therein.

And as in duty bound, etc.

Genevieve H. Marshall Stanley & Mr. Mechem
Solicitors for Plaintiff.

STATE OF MARYLAND, Baltimore City. to wit:

I HEREBY CERTIFY, That on this 2nd day of October, in the year 1924, before me, the subscriber, a Notary Public, in the State of Maryland, in and for Baltimore City, aforesaid, personally appeared Genevieve ^{of} Marshall, the Plaintiff in the foregoing Bill of Complaint, and she made oath in due form of law that the matters and facts therein set out are true to the best of her knowledge and belief.

Mae J. Townsend
Notary Public.

EQUALITY SUPPLEMENT



P255

473
1927

Ct. Ct. No 2

B Docket No. 33

Marshall

vs.

Marshall

Subpoena to Answer Bill of Complaint

PW + B + C

No. 24484 B

2

Copy - Lapid

Filed 8 October 1927
Hankins & McShane
Solicitor.

11

Summoned Edward Moreholt a copy of Process
with a copy of the Bill of Complaint & Served
on the Defendant on the 6th day of October 1927
in Presence of Joseph & Lyett

John E. Pateo
Sheriff

New #130

RECORDED

CONFIDENTIAL

EQUITY SUBPOENA
The State of Maryland

To

Edward Marshall
2010 Spring Hill Ave

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

Genevieve B Marshall

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. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the *8* day of *September*, 192*4*

Issued the *3* day of *October* in the year 192*4*

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

Respondant

B ^{H73}/₁₉₂₄ Docket
Circuit Court No. 2

Marshall

vs.

Marshall

Order Counsel Fee and Alimony
Pendente Lite

ORDER

No. *2448 H.* B.

3

Copied - Copied

Filed *4 October* 19*24*

11

*Copy of the within Order of Court Served on
Edward Marshall on the 6th day of October 1924
in the Presence of Joseph E. Lyett*

*John E. Patee
Sheriff*

Fees \$0.50

IN THE
CIRCUIT COURT No. 2

OF

BALTIMORE CITY

September TERM, 192*4*

Genevieve K Marshall

vs.

Edward Marshall

ORDERED BY THE COURT, this *4* day of *October*, 192*4*,

that the defendant *Edward Marshall*

pay to the plaintiff *Genevieve K Marshall*

the sum of *thirteen*

Dollars per week, during the continuance of this suit as Alimony, pendente lite, unless cause to the contrary be shown on or before the *20*

day of *October*, 192*4*, provided a copy of this Order be served on the said defendant

Edward Marshall on or before the *10*

day of *October*, 192*4*, the question of Counsel fee being reserved for the

further determination of this court.

Walter J. Jenkins

TRUE COPY—TEST:

*\$150. per month = 3750 per year
1 child*

Clerk.

IN THE CIRCUIT COURT NO. 2

OF

BALTIMORE CITY. ^{B473}₁₉₂₄

GENEVIEVE H. MARSHALL

VS.

EDWARD MARSHALL

(CROSS BILL)

EDWARD MARSHALL

VS.

GENEVIEVE MARSHALL

Mr. Clerk:-

Please file.

Davis Evans
ATTORNEYS FOR RESPONDENT.

7/2448 H. B.
4

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

Filed 10 October 1924

GENEVIEVE MARSHALL

VS.

EDWARD MARSHALL

(Cross Bill)

EDWARD MARSHALL

VS.

GENEVIEVE MARSHALL

:

IN THE CIRCUIT COURT NO. 2

:

OF

:

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the above bill of complaint respectfully says:

1. That he admits the first paragraph of your complainant's bill.
2. That he denies with great emphasis the second paragraph of the complainant's bill and further states that the plaintiff was treated with the greatest consideration, with all the rights and privileges of a wife, and during a period of illness was attended by the members of the defendant's family; that she treated the defendant with great cruelty, harshness and brutality.
3. That he denies with great emphasis the third paragraph of your complainant's bill and further states that every since the said plaintiff left the defendant, she has refused to see your respondent and though he carries mail to her door every morning he has been unable to see her, though he often requests to be permitted to converse with her. That he furnished her a nurse and physician during her illness and money for clothing.
4. That he denies with great emphasis the fourth paragraph of your complainant's bill.
5. That he admits the fifth paragraph of your complainant's bill.
6. That he denies with great emphasis the sixth paragraph

of your complainant's bill. And the defendant further says by way of explanation, that the said plaintiff is and has been for some time past, to wit: Nov. 1st, 1923, receiving from the defendant by agreement of counsel, thirty dollars a month for the support of herself and their minor child .

7. ~~That your respondent has answered the bill of complaint and in his answer has shown that the said Genevieve H. Marshall is not entitled to any relief in this Honorable Court, but on the contrary thereof your Order of right and by rules and practice of equity, ought to have relief in the premises, all of which matters will more fully appear by reference to said bill and answer.~~

8. ~~That prior to the time when it is alleged in said plaintiff's bill that the said Genevieve H. Marshall was forced to leave the home of her husband, the said Edward Marshall, because he treated her with cruelty, harshness and brutality, the said Genevieve H. Marshall soon after their marriage began to treat him with contempt, refused to prepare his meals, do such light household duties as were necessary and became so careless as to refuse to attend her person, and became so dirty and filthy that the said Edward Marshall was forced to sleep in an adjoining room. That on or about the 6th day of October, 1923, the said Genevieve H. Marshall left the home of her husband for a trip to Philadelphia, Pennsylvania. That she returned in about a week, and without any cause or reason left the home of the said Edward Marshall and refused and continues to refuse to return to the home of her husband though he has been and continues to pay her thirty dollars a month for her support and the support of their minor child.~~

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

2. That the amount, order as alimony pendente lite be in the order nisi substantially reduced.

3. That your Orator may be divorced a mensa et thoro from his wife, Genevieve H. Marshall.

4. That he may have such other and further relief as his case may require.

May it please your Honor to grant unto your respondent the writ of subpoena directed against the said Genevieve Marshall commanding and requiring her to be and appear in this court on some day certain to answer the premises and abide by and perform such decree as may be passed therein.

AND as in duty bound, etc.

Davis Evans

ATTORNEYS FOR RESPONDENT.

P272

Ct. Ct. No 2

473
1924

B Docket No. 33

Marshall
vs.

Marshall

Subpoena to Answer ^{to} Bill of Complaint

Pro

No. 24484 B

Copy = looped

Filed 14 October 1924
1 November 1924
Davis & Evans

Solicitor.

B

Now Est John E. Potee Sheriff

22 Oct 1924

REISSUED TO Marshall Return Day, 1924

John P. Evans

CLERK

Now Est John E. Potee Sheriff

EQUITY SUBPOENA
The State of Maryland

To

Genevieve Marshall

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

Edward Marshall

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. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the *8* day of *September*, 192*4*

Issued the *10* day of *October*, in the year 192*4*

John P. Casarita

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

473
1924

B

Docket No. *33*

Marshall
vs.

Marshall

cross
Subpoena to Answer Bill of Complaint

Copy

No. _____

Filed _____, 192

Solicitor.

EQUITY SUBPOENA
The State of Maryland

To



Genevieve Marshall

REISSUED TO *November* ~~22 - Oct~~ Return Day, 1924
John Pleasant
CLERK.

of Baltimore City Circuit:

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

Edward Marshall

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. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the *8-* day of *September*, 1924
Issued the *10-* day of *October*, in the year 1924

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.)

TRUE COPY TEST

John Pleasant
CLERK

Hauskins & McMechen

NY

✓ 9

Cir. Ct. No. 2

473

192 *Y*

Docket No.

Genevieve Marshall

vs.

Edward Marshall

MOTION FOR HEARING

No. 214484 B

6

Filed, *20 October* 192 *Y*

Davis & Evans

Genevieve Marshall

IN THE

Circuit Court No. 2

OF

BALTIMORE CITY

vs.
Edward Marshall

The *Defendant*
his

by *Davis & Evans*

Solicitor, ^s applies to have the above entitled cause placed in the

Trial Calender for hearing on *Alimony*

In conformity with the First Equity Rule.

Davis & Evans

Solicitor for *Defendant*

Serve on

Hawkins and McMechin
Solicitors

71024

473
1924

Cir. Ct. No. 2

B
Docket No. 33

Marshall

vs.

Marshall

NOTICE AS TO HEARING

1 copy

No. 74484 B

7
Copy = copied

Filed 20 October, 1924

Hecht

Copy of the within Notice served on Hawkins and McMechin,
Solicitors on the 24th day of October, 1924, in the
presence of Louis Hecht

John E. Potee
Sheriff

Fees \$0.50

Present
st

CIRCUIT COURT, No. 2

WHEELING CITY

WHEELING CITY

General Marshall
vs.
Edward Marshall

IN THE
CIRCUIT COURT, No. 2
OF
BALTIMORE CITY.

Upon application made by the Solicitor for the *Defendant*
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 *Monday*

when reached in due course on the said calendar.

JOHN PLEASANTS,
Clerk Circuit Court No. 2.

Ct. Ct. No. 2 33 B. ⁴⁷³/₁₉₂₇

Genivie Marshall

vs.

Edward Marshall

Final Order, Counsel Fee and Alimony

Pendente Lite,

No. 24484 B.
9

Filed *24 October* 1927

Genevieve Marshall

IN THE

CIRCUIT COURT No. 2

vs.

Edward Marshall

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 24 day

of October 1924, that the Defendant Edward Marshall

pay to the plaintiff Genevieve Marshall

the sum of 25 Dollars, as Counsel Fee

for the Solicitor of the _____ and that he

further pay the sum of Five Dollars per week,

during the continuance of this suit, to the said Genevieve Marshall

as Alimony pendente lite accounting from the _____ day of October 1924

Walter A. Dauterive

In the B 473
1924
Circuit Court #2
of
Baltimore City

Marshall
vs
Marshall

~~W
P
S
E
/~~

Exhibit # 1

No 24484B
10

Ex 2 Dec 16 1924

October 6, 1913.

Edw.

I have gone to Philadelphia
for a week with my sister
Myrtha.

Genevieve.

MADE IN U.S.A.
CATYBERT BOND