

B 285/1927

IN THE  
Circuit Court No. 2. of  
Baltimore City

REBECCA MARTIN

VS.

GEORGE WASHINGTON MARTIN

\*\*\*\*\*

*No 28673 D.*

*<1>*

Bill to set-aside a

Decree of Divorce

\*\*\*\*\*

Mr. Clerk:

Please File etc.

*Ad 21st June 1927*

*W. Grant Tyler*

Attorney for the Plaintiff.

\*\*\*\*\*

*175 Orleans St  
3rd floor back  
apartment*

*Serve before 30<sup>th</sup> because  
he goes to work at Sparrows  
Point on 2 to be at work  
at 3 P.M. - 4*



5.

That the defendant committed the CRIME OF ADULTERY with divers lewd and abandoned women which will be more fully set at the hearing of this cause.

6.

That the defendant not being satisfied with receiving my money but sold my sole and separate property; To wit:  
One writing desk; 3 piece wicker set; kitchen cabinet; Oilstove; Express-wagon; mission table; victrola; sewing machine; burea; bed, mattress and springs; 3 dinning room pieces; 12 family pictures; 2 wash rugs; 5 fancy rugs; One large rug; 5 Blankets; 12 Quilts; 6 spreads; 12 sheets; Couch hammock; 18 pillow cases; 18 scarfs; 4 center pieces; 18 tea towels; 9 bath towels; 8 face towels; 8 pillows; 6 cushions; 5 tableclothes; silver tea set; six knives; 6 forkes; six teaspoons; 12 extra silver spoons and one gravey bowl; 2 imported vases; 14 pair curtains; 8 pair porteirs; meat grinder; waffle irons; Oatmeal cooker ( double boiler) One roaster; 2 large Aluminum pots; half dozen blue cups and saucers, half dozen china cups and saucers; Set of dishes containing ninety- eight pieces; medicine cabinet; glass pitcher and six glasses; 4 imported glasses; One large American Flag; gasoline lamp; 4 oil lamps; 6 flat irons, one frying pan; Ice-Cream freezer; two large gold fish bowls; One work basket; One imported brass clock: One Yellow dress; Orange colored dress; Blue Grayvoi dress; plain white dress; and an imported lace dress cape; 3 Night gowns; 2 Princes slips; 3 pair step-ins and two aprons.

7.

That there are no children born as result of their marriage.

8.

That bothe parties are and have been residents of Maryland for more than two years last past.

9.

That the plaintiff in this cause has been sick and as soon as she received information, thru her daughter, that she learned her husband had a divorce from her altho, she, the plaintiff still considered herself wife of the defendant, she got her fare to Baltimore, made an investigation and found it true, began these proceedings to have the fraudulent decree set aside and that she be restored to her status quo, or that she be given her sole and serarate property or its value by the said George Washington Martin, herein named as defendant: Her trunk is still in his possession and he refuses to turn it over to her; Your petitioner has been sick and is unable to pay her Solicitor a sufficient amount to compensate him for his services, while the defendant herein makes at least thirty-dollars per. week, he has money in bank earned by and thru the savings and thrift of his wife, Rebecca Martin, his work is at At Stock Yard No.2. at Sparrows Point.

To the end therefore, Your petitioner prays, this <sup>H</sup>onorable  
to ~~grant~~ an Order setting aside the Fraudulent Decree passed  
in this Honorable Court on September, 17th., 1926, recorded  
in 35--B-- 1926-- Folio--390, number of said papers are,  
( No. 2698I\* -B).

To grant her a DIVORCE A VINCULO MATRIMONII from the defen-  
dant. *To grant her the Writ of sub-paena directed*  
*to defendant to answer the Petition etc.*

To grant her a Nist Order directed to the defendant command-  
ing him to show cause, why, he should not pay her Solicitor,  
a reasonable sum as Counsel fee for her Solicitor for his  
services in these proceedings and a further sum to pay the  
cost of these proceedings.

To pass an Order commanding the defendant to return to the  
plaintiff such of her sole and separate property as he has not  
destroyed or sold and to properly compensate her for such as  
he has sold, given away or hidden or destroyed.

AND SUCH OTHER AND FURTHER RELIEF AS IN EQUITY THE CASE MAY  
REQUIRE.


<sup>A</sup>ND AS IN DUTY BOUND AND SO FORTH.

*Rebecca Martin*  
-----  
Plaintiff

*U. Grant Tyler*  
-----  
Solicitor for the Plaintiff.

STATE OF MARYLAND, BALTIMORE CITY, TO WIT:

This is to certify that personally appeared before me the  
subscriber, a Notary Public, of the State of Maryland, in and  
for Baltimore City, this 20th., day of June, 1927, and made  
oath in due form of law that the matters and facts stated  
are true to the best of her knowledge and belief.

  
-----  
Notary- Public.

P 737

Circuit Court No. 2

285  
192 7 B DOCKET No. 36

Martin

vs.

Martin

**SUBPOENA TO ANSWER BILL OF COMPLAINT**

Pa

No. 28643 B.

copy-looped

Filed 28th day of June 1927

M. Grant Tyler  
S

Solicitor.

RECEIVED AT THE SHERIFFS OFFICE JUN 21 1927 2 39 PM

Summoned and a copy of the process left with the defendant - John E. Rice  
Rice 6/24/27  
Fees \$0.95 Sheriff.

EQUITY SUBPOENA

The State of Maryland

To

*George Washington Martin*  
*1753 Orleans St*  
*3rd Floor back*  
*Serve before 3 P.M.*

of Baltimore City, Greeting:

**WE COMMAND AND ENJOIN YOU,** That all excuses set aside, you do within the time limited by law, beginning on the second Monday of *July*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

*Rebecca Martin*

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 *9th* day of *May*, 192 *7*  
Issued the *21st* day of *June*, in the year 192

*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

George Washington Martin  
Defendant

1753 Orleans St

3rd floor back

Serve before 30 block

B <sup>285</sup>/<sub>1927</sub> Docket 36

# Circuit Court No. 2

Martin

vs.

Martin

Order Counsel Fee and Alimony  
Pendente Lite

## ORDER

No. <sup>28673</sup>/<sub>437</sub> B.

Copy = copied

Filed 21st June 1927

Copy of the within Order of the within Order  
of Court served on George Washington Martin  
on the 24th day of June. 1927 in the presence of:  
Thomas J Rice. Fees \$0.75 John E. Potee  
Sheriff.

JUN 21 1927 2 39 PM

RECEIVED AT  
THE SHERIFFS OFFICE OF



IN THE  
**CIRCUIT COURT No. 2**

OF  
**BALTIMORE CITY**

*May*

TERM, 19*27*

*Rebecca Martin*  
vs.  
*George Washington Martin*

ORDERED BY THE COURT, this *21<sup>st</sup>* day of *June*, 19*27*,

that the defendant *George Washington Martin*

pay to the plaintiff *Rebecca Martin*

the sum of *100*

Dollars per week, during the continuance of this suit as Alimony, pendente lite, unless cause to the contrary be shown on or before the *7<sup>th</sup>*

day of *July*, 19*27*, provided a copy of this Order be served on the said defendant

*George Washington Martin* on or before the *27<sup>th</sup>*

day of *June*, 19*27* the question of Counsel fee being reserved for the

further determination of this court.

*Robert F. Gault*

TRUE COPY—TEST:

*no ches \$ 30. per week*

Clerk.

3/17/3/12

IN THE CIRCUIT COURT NO. 2  
285 OF 36B  
1927  
BALTIMORE CITY.

REBECCA MARTIN

VS.

GEORGE WASHINGTON MARTIN

RESPONDENT'S ANSWER.

Mr. Clerk:-

Please file .

*Davis & Evans*  
ATTORNEYS FOR RESPONDENT

No 28673 B  
L 47

DAVIS & EVANS  
ATTORNEYS AT LAW

*Ed 5- July 1927*

REBECCA MARTIN : IN THE CIRCUIT COURT NO.2

VS. : OF

GEORGE WASHINGTON MARTIN : BALTIMORE CITY

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the Bill of Complaint respectfully says:

1. That he admits the allegations in the first paragraph of said Bill.
2. Answering the second paragraph of the Bill of Complaint your respondent neither admits nor denies that part concerning the time of separation as the year therein named is not definite; and he emphatically denies that his wife left him with his consent and left her best clothing in his home. As to that part of the paragraph alleging the use of money sent by the Complainant to the defendant, your respondent says he has never received any such sums of money and that his wife never sent him the presents as therein alleged and that he never received the letter alleged to have been written in March, 1926.
3. Your respondent emphatically denies the allegations in the third paragraph of the bill of complaint and demands strict proof thereof.
4. Your respondent denies the allegations contained in the fourth paragraph of the Bill of Complaint and demands strict proof thereof.
5. Your respondent denies the allegations contained in the fifth paragraph of the Bill of Complaint.
6. Your respondent denies the allegations contained in the sixth paragraph of the Bill of Complaint.
7. Your respondent admits the allegations contained in the seventh paragraph of the Bill of Complaint.

8. Your respondent admits that part of the eighth paragraph in so far as it refers to him being a resident of the State of Maryland, but emphatically denies that the Complainant is a resident of the State of Maryland.

9. Your respondent denies the allegations contained in the ninth paragraph of the Bill of Complaint *and demands strict proof thereof.*

10. And further answering said Bill of Complaint, your Respondent says that at the time the plaintiff left as alleged in his bill filed in 35 B-1926, Folio 309, she declared her intentions to never again live with him and that the separation was a result of her unbecoming conduct and adulteries as alleged in that Bill. Your respondent further says that he never knew the address of the complainant; that he had never communicated with her since she left in 1926 and that the only information that he had as to her whereabouts was received through her daughter and that was so indefinite he could not communicate with her.

Having fully answered said Bill of Complaint, your respondent prays that the case be dismissed with proper costs.

AND as in duty bound etc.

  
RESPONDENT

  
ATTORNEY FOR RESPONDENT

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this        day of June, in the year one thousand nine hundred and twenty seven, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City aforesaid, personally appeared George Washington Martin and made oath in due form of law that the matters and facts in the foregoing answer are true to the best of his knowledge and belief.

AS WITNESS my hand and Notarial Seal.

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NOTARY PUBLIC.

SERVE ON

*Davis and Evans*

*General*

*Stewart Davis*

133 ✓ 52

Circuit Court No. 2

285 363

1927

DOCKET No.

*Rebecca Martin*

vs.

*George Washington  
Martin*

PETITION AND ORDER TO TAKE  
TESTIMONY UNDER 30TH RULE

No. *28673 B.*

*L57*

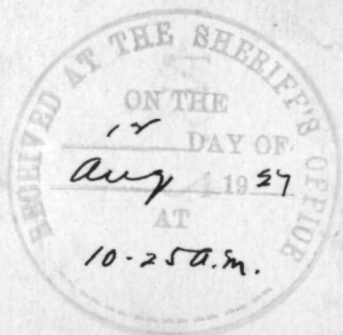
*Copy - Lemie*

Filed *10 - August* 1927

*Copy of the within Order of Court served on Stewart Davis, ATTORNEY, on the 13th day of August 1927 in the Presence of Frank A. Budacz.*

*John E. Potter  
Sheriff*

*Fees \$0.75*



✓ 3

Rebecca Martin  
vs.  
George Washington  
Martin

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 10th day of August  
A. D. 1927, Ordered that the Petitioner have leave to take testimony as prayed and that the testimony to be offered be taken as required by the 30th Rule of this Court. And it is further Ordered that a copy of this Petition and Order be served on the plaintiff, George Washington Martin or his Solicitor, on or before the 15th day of August, 1927

Joseph N. Alaman

Ct. Ct. No. 2

285  
1926

No. .... Docket 3613

Rebecca Martin

vs.

George W. Martin

SUMMONS FOR WITNESS

No. 28643B  
67

Filed 6- day of July 1928



FEB 2 1928 3 56 PM

RECEIVED  
THE SHERIFF'S OFFICE ON

1928



