

IN THE  
CIRCUIT COURT OF  
BALTIMORE CITY

B 331  
1926

BETTIE NELSON  
Bettie

VS  
416 S. Caroline St

IRENE NELSON  
2029 Madison Ave.

B 30,897

BILL OF COMPLAINT  
&  
ORDER OF COURT

Mr. Clerk:

Please file, etc.,

*William Harry Paired*  
Solicitor for Complainant.

Fd 28 Aug 1926

Fd 5 Aug 1926

Fd 9 Aug 1926  
B 3931  
J. Calvin Corpey  
WILLIAM HARRY PAIRD  
ATTORNEY AT-LAW

1208 PENNSYLVANIA AVE.  
BALTIMORE, MD.

Fd 29 July 1926

*Walter H. Billingslea  
Cashier June 3:17 P.M. 7/30/26  
Commonwealth Bank*

Copy of the within Order of Court passed on the Commonwealth Bank, as Corporation, by Dennis and Walter H. Billingslea Cashier on the 30th day of July, 1926 at 3:20 o'clock P.M. in the presence of August J. Becky, now set as to Irene Nelson.

*fees \$0.50*

*John E. Potter  
Scribble*

*Now set as to Irene Nelson*

*(and Return)*

*John E. Potter  
Scribble*

*Copy of the within Order of Court received on Irene Nelson on the 30th day of August 1926 in presence of William S. Becky*

*fees \$0.50*

*John E. Potter  
Scribble*

*8/17/26*



Bertie Nelson

vs

Irene Nelson

\*  
\*  
\*  
\*  
\*  
\*

In The

Circuit Court of

Baltimore City.

July Term, 1926.

*Walter H Bellingslea  
Cashier Commonwealth Bank  
Time 3:17 PM 7/30/26 (10)*

To The Honorable, The Judge of Said Court:

The Plaintiff, complaining, respectfully represents unto Your Honor as follows:

1. That he and the above named Defendant were married in the City of Baltimore on the 11th day of April, 1925, by a Minister of the Gospel.
2. That there is no issue from said marriage.
3. That the Plaintiff has resided in the State of Maryland for more than two years last past.
4. That the Defendant deserted and abandoned the Plaintiff on the 27th day of July, 1926, and declared her intention to live with the Plaintiff no longer.
5. That since the marriage of the parties Your Orator <sup>with his own funds</sup> has opened a bank account with the Commonwealth Bank in their joint names, and that immediately before the separation the Defendant withdrew the entire amount from this account, and placed this fund in another account with the same bank, in her name only.
6. Your Orator avers that he has always been a loving, faithful, and affectionate husband, and never gave the Defendant any just cause or provocation for her conduct as aforesaid.

WHEREFORE THE PLAINTIFF PRAYS:

- A. That he may be granted a decree of divorce A MENSA ET THORO from the said Defendant:
- B. That he may be granted an order restraining the said Defendant from withdrawing the said monies from the aforesaid bank account now standing in the name of the Defendant:
- B. That he may be granted an order restraining the said Commonwealth Bank from paying the aforesaid money to the said Defendant pending the further order and determination of this Court:
- C. That the said bank account shall be declared to be the property of the Plaintiff:
- D. That the Plaintiff may be granted the Writ of Subpeona directed unto the Defendant requiring her to appear and answer hereto:
- E. That he may have such other and further relief to which he is entitled to receive in Equity.

And as in duty bound, etc.,

Bertie Nelson  
Complainant

*Walter H Bellingslea*  
Solicitor for Complainant.

SWORN to and subscribed before me this 29th day of July, 1926, by Bertie Nelson.  
WITNESS my hand and Notarial Seal.

*Preston A. Fair* Notary Public



ORDER

\* \* \* \* \*

ORDERED, by the Circuit Court of Baltimore City, this 29<sup>th</sup> day of July, 1926, that the Commonwealth Bank, a body corporate, be and it is hereby restrained pending the further order of this Court from paying to the Defendant, Irene Nelson, her agents, servants, or employees, or upon her order, the monies now held by them in her name.

IT IS FURTHER ORDERED that the said Defendant, Irene Nelson, be and she is hereby restrained from attempting to withdraw any of the said fund from the Commonwealth Bank, pending the further order of this Court,

*unless cause to the contrary be shown on or before the 3<sup>rd</sup> day of August 1926 provided a copy of this order be placed on the said Defendant and the Commonwealth Bank.*

*Joseph N. Williams*

as to defendant.

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 <sup>5<sup>th</sup></sup> day of *August* 1926, that the time for showing cause under said Order be extended to the <sup>9</sup> day of *August* 1926, and the time for service of a copy of the same be extended to the <sup>7<sup>th</sup></sup> day of *August* 1926

*Walter J. Daniels*



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 28 day of August 1926, that the time for showing cause under said Order be extended to the 16 day of September 1926, and the time for service of a copy of the same be extended to the 9 day of September 1926.

George A. Salter

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 9<sup>th</sup> day of August 1926., that the time for showing cause under said Order be extended to the 24<sup>th</sup> day of August 1926., and the time for service of a copy of the same be extended to the 17<sup>th</sup> day of August 1926

Robert F. Stanton



P 668

B331  
1926

Ct. Ct.  
Docket No.

Nelson

vs

Nelson

416 1/2 Caroline

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B 30897.  
(2) (5)

Filed

9 Aug 1926  
J. C. Carney, SOLICITOR  
#d 7 Sept 1926  
2-11

Non Est  
Lycett

John E. Potter  
Sheriff

Aug 1926

REISSUED TO Applicant Return Day, 1926

Charles Whiteford  
Clerk

Summoned and a copy of the process left with the

Attendant  
Buck

John E. Potter

8/31/26

Sheriff

New 10.80

EQUITY SUBPOENA

The State of Maryland

To

*Jene Nelson*  
~~*# 2029 Madison Ave*~~  
*416 S. Caroline*

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

*Buttie Nelson*

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 *12* day of *July* 192 *6*  
Issued the *29* day of *July*, in the year 192 *6*

*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.



IN THE CIRCUIT COURT OF

BALTIMORE CITY.

66<sup>th</sup> 33/19 26

BUTTIE NELSON

VS.

IRENE NELSON

13 30 897  
28

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

*Lewis Evans*  
ATTORNEYS FOR RESPONDENT

DAVIS & EVANS  
ATTORNEYS AT LAW

*Filed 14 Sept 1926*

BUTTIE NELSON

:

IN THE CIRCUIT COURT

VS.

:

OF

IRENE NELSON

:

BAITIMORE CITY.

---

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of the defendant to the petition in the above case exhibited is as follows:

1. She admits the marriage as alleged in the first paragraph of the Bill of Complaint.
2. She admits the allegations in the second paragraph of the Bill of Complaint.
3. She admits the allegations in the third paragraph of the Bill of Complaint.
4. She denies with great emphasis the allegations contained in the fourth paragraph of the Bill of Complaint.
5. She admits that prior to the separation that she and her husband had a joint bank account in the Commonwealth Bank. She further avers that she withdrew the said money and re-deposited it in her name after the plaintiff had ordered her to leave him and had told her that he wished to live with another woman; and that there is now remaining \$3.91.
6. She denies that the conduct of the plaintiff has been above reproach and avers that he has been unfaithful.
7. Your respondent further avers that she is without means of defraying the expenses of this suit and that the plaintiff is employed earning one hundred and fifty dollars per month; and that she is advised by counsel that she is entitled to petition this Honorable Court to issue an order awarding her alimony



pendente lite and a sum to compensate her solicitor.

WHEREFORE your respondent prays:

- (a) Alimony pendente lite and counsel fee.
- (b) That the Bill of Complaint be dismissed with costs to the plaintiff.

AND as in duty bound, etc.

*David Stevens*

---

ATTORNEYS FOR RESPONDENT.

Serve on  
Henry M Siegel Sol.

Service of copy admitted  
this 29th day of  
December, 1926.

Henry M Siegel  
Solicitor for  
Buttie Nelson.

Docket B331  
1926

# Circuit Court

Buttie Nelson

VS.

Irene Nelson

Order Counsel Fee and Alimony

Pendente Lite

No. B30897

\$150 per month (17)

Ed 28 Dec 1926

Davis and Evans  
Sols

4916 Dept 1926  
B-1

Now set

John E. Potee

Sheriff

(2nd Return)  
Copy of the within Order of Court served on Henry M. Siegel, Solicitor for Buttie Nelson on the 29 day of December, 1926, in the presence of Louis Hecht.  
John E. Potee Sheriff

Two \$0.50

302  
American



Buttie Nelson

vs.

Irene Nelson

—IN THE—

CIRCUIT COURT

—OF—

BALTIMORE CITY

September

TERM

ORDERED BY THE COURT this 16 day of September 1926

that the Plaintiff Buttie Nelson

pay to the Defendant Irene Nelson

the sum of ~~Twelve~~ Thirty 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 Irene Nelson

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 30

day of September 1926, provided a copy of this Order be served on the said Plaintiff

Buttie Nelson on or before the 24

day of September 1926

*critland*

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 28<sup>th</sup> day of December 1926, that the time for showing cause under said Order be extended to the 12 day of January 1927, and the time for service of a copy of the same be extended to the 6<sup>th</sup> day of January 1927.

*W. Frank*

✓ Sermon J. Calvin  
Carney - atty.

331  
479

IN THE CIRCUIT COURT OF

BALTIMORE CITY

331  
/1926

BUTTIE NELSON

VS.

IRENE NELSON

(IN CROSS BILL)

IRENE NELSON

VS.

BUTTIE NELSON

CROSS BILL

B. 30897

Mr. Clerk:-

(10)

Please file.

*Davis Evans*

ATTORNEYS FOR PLAINTIFF  
IN CROSS BILL

DAVIS & EVANS  
ATTORNEYS AT LAW

Filed Nov 1926



BUTTIE NELSON

:

IN THE CIRCUIT COURT

VS.

IRENE NELSON

:

( IN CROSS BILL )

OF

IRENE NELSON

:

VS.

BUTTIE NELSON

:

BALTIMORE CITY

---

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully says:

1. That heretofore, to wit: Buttie Nelson, the husband of your Oratrix, filed his bill of complaint against her in this Court praying among other things a divorce A Vinculo Matrimonii from your Oratrix.

2. That your Oratrix has answered said bill of complaint and in her answer has shown that Buttie Nelson is not entitled to any relief from this Honorable Court.

3. That prior to the time of the alleged separation and on numerous occasions since the separation, the defendant has committed the crime of adultery with divers, lewd and abandoned women, whose names to your Oratrix are unknown, and said offense has not been condoned by your Oratrix.

4. That your Oratrix has not lived or co-habited with the said defendant since the discovery of the adulteries complained of..

TO THE END, THEREFORE:

(a) That your Oratrix may be divorced A Vinculo Matrimonii from the said Buttie Nelson.

(b) That she 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 against the said Putie Nelson,  
commanding and requiring him to be and appear in this Court on  
some day certain to be named therein to answer the premises and  
abide by and perform such decree or order as may be passed therein.

AND as in duty bound, etc.



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SOLICITORS FOR PLAINTIFF IN  
CROSS BILL.

P791

B498  
1926

Docket No.

Ct. Ct.

Nelson

vs

Nelson

Sumitar  
Berkeley arms sp 1027139

**SUBPOENA TO ANSWER BILL OF COMPLAINT**

No.

B 30897  
(11)

Filed

13 Dec

1926

Davis and Evans  
SOLICITOR

P-19

as H Paul

Summoned and a copy of the Process  
left with the defendant

John C. Lott  
Sheriff

New \$0.80

(Dorsey)  
11/27/26



EQUITY SUBPOENA

The State of Maryland

To

*Buttie Nelson*

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

*Irene Nelson*

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 **8<sup>th</sup>** day of **November** 192 **6**  
Issued the *8<sup>th</sup>* day of **November**, in the year 192 **6**

*Charles 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.

IN THE CIRCUIT COURT  
OF  
BALTIMORE CITY

BUTTIE NELSON

VS.

IRENE NELSON

IRENE NELSON

VS.

BUTTIE NELSON

ANSWER TO CROSS-BILL OF COMPLAINT

*B30897*

Mr. Clerk:

*(12)*  
Please file, etc.

*Henry Siegel*  
Solicitor for Respondent in Cross-  
Bill of Complaint

LAW OFFICES  
SIEGEL & SIEGEL  
301-302 AMERICAN BUILDING  
BALTIMORE, MD.

FILED

*10 Dec 1926*

BUTTIE NELSON : IN THE CIRCUIT COURT  
 VS. :  
 IRENE NELSON :  
 IRENE NELSON : OF  
 VS. :  
 BUTTIE NELSON : BALTIMORE CITY

.. .. .

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your respondent in cross-bill, in answer to the cross-bill of complaint heretofore filed in the above entitled cause, respectfully states unto Your Honor as follows:

1. That your respondent in cross-bill admits the allegations as contained in the first paragraph of said cross-bill of complaint.

2. That your respondent in cross-bill denies the allegations as contained in the second, third and fourth paragraphs of said cross-bill of complaint, and on the contrary avers that the complainant in cross-bill has committed the crime of adultery in Baltimore City, State of Maryland, all of which will be more fully gone into at the hearing of this cause, and since the discovery of which your respondent has not lived or cohabited with the said complainant in cross-bill. Your respondent in cross-bill further alleges that the complainant in cross-bill deserted and abandoned your respondent in cross-bill on the 28th day of July, 1926, without any just cause or provocation and that said desertion and abandonment was the deliberate and final act of the complainant in cross-bill.

Having fully answered said cross-bill of complaint, your respondent respectfully prays that same be dismissed.

And as in duty bound, etc.

*Henry Siegel*  
 Solicitor for Respondent in Cross-Bill of Complaint.

*B. A. Nelson*  
 Respondent in Cross-Bill of Complaint



331  
1926

66 B

In Re

Circuit Court of  
Baltimore City

Buttie Nelson

vs

Irene Nelson

B30897  
(13)

Feb 15<sup>th</sup> Dec 1926

BUTTI : NELSON

VS

FREED : NELSON

:  
:  
:  
:  
:  
:  
:  
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:  
:  
:

IN THE

CIRCUIT COURT OF

BALTIMORE CITY.

November Term, 1926.

Mr. Clerk:

Please strike out my appearance in the above captioned  
case.



# CIRCUIT COURT

331  
1926

Docket No. 66 B

*Beattie Nelson*

*vs.*

*Irene Nelson*

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## ORDER OF APPEARANCE

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*Mr. Clerk*

*Please File*

*Preston A. Raub*  
*Sol. for Plff.*

*BNo. 30897*  
*(14)*

*Filed 15 day of Dec 1926*



*Buttie Nelson*

vs.

*Irene Nelson*

IN THE  
**Circuit Court**  
OF  
BALTIMORE CITY

*November Term, 1926*

Mr. WHITEFORD, Clerk.

*Plaintiff*  
Enter my appearance for ~~Defendant~~

*Preston A. Paired*

Solicitor

**CIRCUIT COURT**

19 26 66 B, Docket No. 331

Bertha Nelson

vs.

Irene Nelson

Order

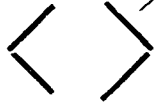
19

*Rapp*

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

B No. 30897

(15)



Fd 15<sup>4</sup> Woe 19 26

Bertie Nelson

vs.

Irene Nelson

IN THE  
Circuit Court  
OF  
BALTIMORE CITY

To the Honorable the Judge of the  
Circuit Court of Baltimore City:

THE PETITION OF *the plaintiff in the Cross Bell*

in this case, respectfully shows that desire to take testimony in this case, and  
respectfully pray that leave be granted to do so before one of the Standing  
Examiners of this Court.

*Davis & Evans*  
Solicitor for complainant *in cross bell*

ORDERED, this *15<sup>th</sup>* day of *December* 19*26* 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.

*E. J. Frost*



Davis & Evans  
Per H.F.  
Dec. 27, 1926

CIRCUIT COURT

331  
1926

Docket No. 66B

BUTTIE NELSON  
VS.  
IRENE NELSON  
IRENE NELSON  
VS.  
BUTTIE NELSON

(11)

PETITION AND ORDER TO  
TAKE TESTIMONY UN-  
DER 30th RULE

No. B30897

(16)

Fd. 22 Dec 1926

H

Copy of the within Petition and Order of Court  
served on Davis and Evans, Solicitors at, the 27th  
day of December, 1926, in the presence of said Clerk  
John E. Potee  
New \$0.50  
Shuff

RECEIVED AT  
THE CLERK'S OFFICE ON

DEC 23 1926 2 42 PM

BUTTIE NELSON  
VS.  
IRENE NELSON  
IRENE NELSON  
VS.  
BUTTIE NELSON

IN THE  
**Circuit Court**  
OF  
BALTIMORE CITY

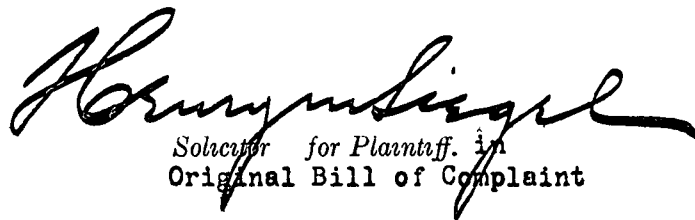
To the Honorable the Judge of the  
**Circuit Court of Baltimore City:**

*in the original bill of complaint*  
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 therefor prays your Honor to pass an order, according to the Statutes for such case made and provided.

And as in duty bound will ever pray.

  
Solicitor for Plaintiff, in  
Original Bill of Complaint

Upon the foregoing Petition and Application it is this 22<sup>nd</sup> day of December  
A. D., 19 26 , 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 defendant or her  
Solicitor , on or before the 31<sup>st</sup> day of December 1926, and it  
is further Ordered that the Order heretofore passed by this Court directing that testi-  
mony be taken before one of the Standing Examiners of this Court be and the same is  
hereby reseinded.



*Flowers and Corsets*

66 B - 231 Ct. Ct.  
1926 No. Docket

*Buttie Nelson*

vs.

*Jane Nelson*

**MOTION FOR HEARING**

*B 30897  
(18)*

No.

Filed *29* day of *Dec* 1926

*Henry M. Heagle  
Clerk of Court*

*Butte Nelson*

vs.

*Inene Nelson*

IN THE  
**CIRCUIT COURT**  
OF  
BALTIMORE CITY

The *defendant* by *Davis & Evans*

Solicitor, applies to have the above entitled cause placed on the Trial Calendar  
for hearing *on alimony & counsel fee*

in conformity with the First Equity Rule.

*Davis & Evans*  
Solicitor for *complaint*



Serve on

H.M.Siegel 302 American  
P.A.Pairo 1208 Penn Ave

Service admitted this

3rd of Jan., 1927.

Henry M. Siegel  
a.s.

RECEIVED AT  
THE SHERIFFS OFFICE ON

DEC 30 1926 2 36 PM

Ct. Ct.

331  
1926 No. B-66 Docket

Nelson

vs.

Nelson

**NOTICE OF HEARING**

(2)

B- No. 30897  
(19)

No. ....

Filed 29 day of Dec. 1926

14

Copy of the writ of Habeas Corpus served on Henry M. Siegel  
and P.A. Pairo, Solicitors on the 3rd day of January, 1927,  
in the presence of Louis Hecht.

John E. Potee  
Sheriff

Dec 30/26

Buttie Nelson

vs.

Irene Nelson

IN THE

**CIRCUIT COURT**

OF BALTIMORE CITY

Upon application made by the Solicitors 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 Alimony & Counsel fee

when reached in due course on said calendar.

CHARLES R. WHITEFORD

*Clerk Circuit Court.*

3/13/37

IN THE CIRCUIT COURT  
OF  
BALTIMORE CITY

B 498  
1926

BUTTIE NELSON

VS.

IRENE NELSON

IRENE NELSON

VS.

BUTTIE NELSON

ANSWER TO ORDER OF COURT

B 30897

Mr. Clerk:

20

Please file.

*Henry Siegel*  
Solicitor for Respondent in  
Cross Bill & Complaint

LAW OFFICES  
SIEGEL & SIEGEL  
301-302 AMERICAN BUILDING  
BALTIMORE, MD.

FILED

8 Jan 1927



BUTTIE NELSON :  
 VS. : IN THE CIRCUIT COURT  
 IRENE NELSON :  
 IRENE NELSON : OF  
 VS. : BALTIMORE CITY  
 BUTTIE NELSON :

.. .. .v.. .. .. .

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your respondent, in answer to the Order heretofore passed by this Honorable Court, directing him to pay unto the complainant in Cross-Bill, the sum of Twelve Dollars a week as alimony pendente lite, and counsel fee of Thirty-five Dollars, unless cause to the contrary be shown on or before the 12th day of January, 1927, respectfully represents unto Your Honor as follows:

1. That your respondent, after the payment by him of all of his necessary expenses does not have sufficient of his earnings remaining to comply with the Order of this Court. That the said complainant in Cross-Bill is employed and is self-sustaining.

WHEREFORE and for other reasons to be shown at the hearing of this cause. your respondent respectfully prays that said Order be modified.

And as in duty bound, etc.

B. E. Nelson  
 Respondent in Cross-Bill of  
 Complaint

Henry Siegel  
 Solicitor for Respondent in  
 Cross-Bill of Complaint.