

IN THE CIRCUIT COURT FOR

BALTIMORE CITY

*B* 172  
—  
1921

OWEN H. NORRIS

VS

SUSIE NORRIS

BILL OF COMPLAINT

Mr. Clerk:—

Please file.  
*B 22335*

*Harry O. Levin*  
Solicitor for Complainant.

HARRY O. LEVIN

ATTORNEY AT LAW

*fd 50 June 1921*  
3-53 ELY B. BUILDING  
BALTIMORE MD.

OWEN H. NORRIS : IN THE CIRCUIT COURT  
vs : OF  
SUSIE NORRIS : BALTIMORE CITY

.. .. .

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

Your Orator, complaining, respectfully represents unto your Honor:-

1. That he was married to the Defendant on December 30th, 1915, in the City of Baltimore, Maryland, by Rev. S. A. Virgil, a minister of the Gospel.

2. That two children were born as the result of said wedlock, - James Owen Norris, aged four years, and Ophelia Norris, aged two years, both children being in the custody of your Orator.

3. That for more than two years prior to the filing of this Bill of Complaint, your Orator and the Defendant have been residents of the City of Baltimore, State of Maryland.

4. That, although your Orator has always conducted himself as a chaste and affectionate husband, the Defendant has committed the crime of adultery with certain persons whose names are at the present time, unknown to your Orator; that since the discovery of said adultery your Orator has not lived nor cohabited with the said Defendant, nor has he condoned the said offences.

TO THE END THEREFORE:

(a) That he may be divorced a vinculo matrimonii from the Defendant.

(b) That he may be awarded the care and custody of the said infant children, James Owen Norris and Ophelia Norris.

(c) That he may have such other and further relief as the nature of his case may require.

MAY IT PLEASE YOUR HONOR to grant unto your Orator, the Writ of Subpoena, directed to the Defendant, Susie Norris, <sup>Residing in Huntington, Calvert Co. Md</sup> commanding her to be and appear in this Honorable Court on some day certain to be named therein, and abide by and perform such decree as may be passed therein.

AND, as in duty bound, etc.

Harvey O'Brien  
Solicitor for Complainant.

Owen H. Norris  
Complainant.

STATE OF MARYLAND:

TO WIT:

CITY OF BALTIMORE:

I HEREBY CERTIFY that on this 4<sup>th</sup> day of April, in the year one thousand nine hundred and twenty-one, before me, the subscriber, a Notary Public of the State of Maryland, in and for Baltimore City aforesaid, personally appeared Owen H. Norris, and he made oath in due form of law that the matter and facts above set forth are true and bona fide to the best of his knowledge, information and belief.

AS WITNESS my hand and Notarial Seal.

Caroline K. Harback  
Notary Public.

Sumner and  
copy left with  
Jessie Norris on  
April 8th 1921  
J. B. Johnson  
Sheriff

172 B 61 Ct. Ct.  
1921 Docket No.

Norris

"

Norris  
Huntingdon

SUBPOENA TO ANSWER BILL OF COMPLAINT

Lebarco  
No. B 22335

{2}

Filed 9 April 1921

H. O. Lewis  
SOLICITOR

Received 7th day of April 1921  
and forthwith delivered to the Sheriff of  
Calvert County, Test:

Arthur A. Hartness, Clerk

Sheriff cost  
80 cts

EQUITY SUBPOENA

The State of Maryland

In

*Issie Norris*



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

*Owen H Norris*

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City; the *14* day of *March* 192 *1*

Issued the *5* day of *April*, in the year 192 *1*

*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.

(General Equity Rules 11.)

172  
1921

In the  
Circuit Court  
of  
Baltimore City.

-----  
Owen H. Norris  
Vs  
Susie Norris

-----  
Answer of Defendant  
to Bill of Complaint.

-----  
Mr. Clerk:  
Please file.

*Howard Sweeten*  
Solicitor for Defendant.

*B 22 335*

*3*

*fd 15 apr 1921*

Owen H. Norris            ::  
                                  Vs                            ::  
Susie Norris                ::

In the  
Circuit Court  
of  
Baltimore City.

To the Honorable, the Judge of said Court:

The Answer of Susie Norris, the defendant in the above entitled cause, respectfully represents unto Your Honor as follows:

1. That she admits the marriage of the parties to this cause, and the residence of the plaintiff, as setforth in the first and third paragraphs of said Bill of Complaint.

2. And answering the second paragraph of the Bill of Complaint, this defendant states that three children were born to the parties to this cause, as the offspring of said marriage, they being, James O. Norris, four years of age, and Ophelia Norris, who will soon be three years old, and both of whom are now in the custody of the plaintiff's mother, and the youngest child, Irene Norris, who is seven months of age, now being with this defendant.

3. And answering the fourth paragraph of the Bill of Complaint, this defendant emphatically denies that she has ever committed adultery, and demands full and strict proof the plaintiff's allegation thereof.

Having answered the Bill of Complaint as fully as she is advised this defendant prays to be dismissed, with her reasonable costs.

And, as in duty bound, etc.,

*Howard A. Sweeten*  
Solicitor for Defendant.

*Susie Norris*  
Defendant.

172  
1921

In the  
Circuit Court  
of  
Baltimore City.

-----

Owen H. Norris  
Vs  
Susie Norris

-----

Petition of Defendant  
for alimony pendente  
lite and counsel fee.

-----

Mr. Clerk:

Please file.

B 22335

*Howard Adweeten*  
Solicitor for Petitioner.

*fd 15 apr 1921*





STATE OF MARYLAND, Calvert County, to wit:

I hereby certify that on this 14<sup>th</sup> day of April, 1921, before me, the subscriber, a Justice of the Peace of the State of Maryland, in and for Calvert County aforesaid, personally appeared Susie Norris, the aforementioned Petitioner, and she made oath in due form of law that the matters and facts as aforestated are true, to the best of her knowledge, information and belief.

As witness my hand and official seal.

Chas. H. Harrison, J. P.

Serve on  
Owen H. Norris,  
colored,  
c/o Horn & Horn,  
lunch room

172  
1921

B Docket 61

# Circuit Court

Owen H. Norris

vs.

Susie Norris

Order Counsel Fee and Alimony

Pendente Lite

B  
No. 22335

5

\$25 a wk  
& children

fd 15 April 1921  
2

copy of the within Order of Court served on  
Owen H. Norris on the 23rd day of April, 1921  
in the presence of Maurice L. Yaffe  
Thomas J. McTully  
Sheriff

Fees \$0.50

-IN THE-

CIRCUIT COURT

-OF-

BALTIMORE CITY

Owen H. Norris

vs.

Susie Norris

March

TERM 1921

ORDERED BY THE COURT this 15th day of April 19 21

that the Plaintiff Owen H. Norris

pay to the Defendant Susie Norris

the sum of Twenty-five Dollars as Counsel Fee for the Solicitor of the Defendant and that he further pay the sum of Ten

Dollars per week, during the continuance of this suit, to the said Defendant Susie Norris

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

day of April 1921, provided a copy of this Order be served on the said Plaintiff

Owen H. Norris on or before the 23

day of April 1921..

Handwritten signature of the court clerk.

TRUE COPY-TEST:

CLERK

172  
1921

In the  
Circuit Court  
of  
Baltimore City.

-----  
Owen H. Norris

Vs

Susie Norris

and

Susie Norris

Vs

Owen H. Norris

*of Home Home, Lunch Room*  
-----

Cross-Bill of Complaint

*B-22335*

Mr. Clerk:

*6*  
Please file.

*Howard Sweeten*  
Solicitor for Plaintiff  
in Cross-Bill.

*pd 15 April 1921*

Owen H. Norris	::	In the
Vs	::	
Susie Norris	::	Circuit Court
and	::	
Susie Norris	::	of
Vs	::	Baltimore City.
Owen H. Norris	::	

CROSS-BILL OF COMPLAINT.

To the Honorable, the Judge of said Court:

Your Oratrix to the Cross-Bill of Complaint complaining, respectfully represents unto Your Honor as follows:

1. That heretofore the said Owen H. Norris, the husband of Your Oratrix, filed his bill of complaint in this Honorable Court, wherein he prayed for a divorce a vinculo matrimonii from Your Oratrix, on the ground of her alleged adultery. That she has answered the Bill of Complaint, denying such charge, and has shown that her husband's is not entitled to the relief sought.

2. That the parties to this cause were married on December 30th, 1915, by a religious ceremony.

3. That three children, viz: James O. Norris, now four years of age, Ophelia Norris, who is over two years old, and Irene Norris, now seven months of age, were born to the parties to this cause, as the offspring of said marriage. That the two older children aforementioned are now in the custody of their paternal grandmother, whilst the youngest child is in the custody of Your Oratrix.

4. That the parties to this cause have been residents of the State of Maryland for more than two years prior hereto, Your Oratrix now being a resident of Calvert County, while the defendant herein lives in Baltimore City.

5. That the defendant herein abandoned and deserted Your Oratrix heretofore, without any just cause or excuse therefor.

6. That the said defendant herein, Owen H. Norris, has committed adultery with divers women, whose names are at present unknown to Your Oratrix, in Baltimore City and elsewhere, in the years A. D. 1919, 1920 and 1921, and more particularly in the months of October, November and December, 1919, and January, 1920. That since discovering said facts Your Oratrix has not lived nor cohabited with the said Owen H. Norris, nor has she in any way forgiven him.

7. That Your Oratrix has no means of her own for the maintenance and support of herself and the youngest child of the parties hereto, with the exception of the sum of \$40.00 per month, which Your Oratrix receives by teaching school in Calvert County, whilst the defendant herein is employed as a waiter in Baltimore City and earns about \$25.00 per week.

Wherefore Your Oratrix prays:

-a- That she be divorced a vinculo matrimonii from the said defendant herein, Owen H. Norris;

-b- That she be awarded the custody of all of the infant children mentioned in this proceeding, and that the said Owen H. Norris, their father, be charged with their maintenance and support;

-c- That Your Oratrix be allowed alimony pendente lite, as well as alimony permanently thereafter, and a reasonable sum as a counsel fee for her Solicitor of Record;

-d- And for such other and further relief as to Your Honor in the premises may seem meet and proper.

May it please Your Honor to grant unto Your Oratrix the writ of subpoena directed against the said defendant, Owen H. Norris, residing in Baltimore City, State of Maryland, commanding him to be and appear in this Honorable Court on or before some certain day to be named therein to do, perform and abide by any decree that may be passed in the premises.

And, as in duty bound, etc.,

*Lucie Norris*

~~PLAINTIFF IN CROSS BILL.~~

*Howard A. Sweeten*  
SOLICITOR FOR PLAINTIFF  
IN CROSS BILL.

172 161

1921

Docket No.

Ct. Ct.

Korn  
Korn

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

22335

Filed

4 same  
Howard A Sweeten

1921

SOLICITOR

2

Summoned and a copy of the Process left  
with the defendant

Thomas J. McTully  
Sheriff

(Yoffe) 4/23/21

4-23-21



EQUITY SUBPOENA

The State of Maryland

To

Owen H. Norris

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

MAY next Mrs. Beach

Lusie Norris

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the 14th day of MARCH 1921

Issued the 15, day of APRIL, in the year 1921

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.

(General Equity Rules 11.)

IN THE CIRCUIT COURT OF

BALTIMORE CITY

OWEN H. NORRIS

VS

SUSIE NORRIS

.....  
SUSIE NORRIS

VS

OWEN H. NORRIS

---

ANSWER TO ORDER NISI

---

Mr. Clerk:-

Please file.

*Harry O Levin*  
Solicitor for Plaintiff.

*B 22335*

*8*

HARRY O. LEVIN

ATTORNEY AT LAW

443-453 CALVERT BUILDING  
BALTIMORE, MD

*sd H May 1927*

OWEN H. NORRIS

vs

SUSIE NORRIS

• • • • •  
SUSIE NORRIS

vs

OWEN H. NORRIS

:  
:  
:  
:  
:  
:  
:  
:

IN THE CIRCUIT COURT  
OF  
BALTIMORE CITY

• • • • •

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

And the said Owen H. Norris, for answer to the Order of this  
Honorable Court passed on the fifteenth day of April, 1921, says:-

That he is not possessed of such estate, nor does he earn such  
income as to enable him to carry out the provisions of said order.

  
Solicitor for Plaintiff.

IN THE CIRCUIT COURT OF

BALTIMORE CITY

*B* 172  
OWEN H. NORRIS  
1921

VS

SUSIE NORRIS

•••••  
SUSIE NORRIS

VS

OWEN H. NORRIS

---

ANSWER TO CROSS BILL OF COMPLAINT

---

Mr. Clerk:-

Please file.

*B* 22335  
*Harry O Levin*

Attorney for Respondant in  
Cross Bill

---

HARRY O. LEVIN

ATTORNEY AT LAW

*B* 4 May 1921  
443-453 CALVERT BUILDING  
BALTIMORE MD.

OWEN H. NORRIS

vs

SUSIE NORRIS

SUSIE NORRIS

vs

OWEN H. NORRIS

:

:

:

:

:

:

IN THE CIRCUIT COURT

OF

BALTIMORE CITY

.. .. .

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

Your Respondant, for answer to the Cross Bill of Complaint, respectfully represents:-

FIRST: He admits the allegations contained in the first, second, third and fourth paragraphs of said Cross Bill of Complaint.

SECOND: He denies the allegations contained in the fifth, sixth and seventh paragraphs of said Cross Bill of Complaint, and says that he has no knowledge of the same.

HAVING fully answered, as he is advised, your Respondant prays that said Bill may be hence dismissed.

AND as in duty bound, etc.

*Owen H. Norris*

*Harry O'Brien*

Solicitor for Respondant in  
Cross Bill

*Subscribed and sworn to before me  
this 3rd day of May 1920*

*Leonard K. Harbark  
Notary Public*



Owen H. Norris

vs.

Susie Norris

and Cross-Bill

IN THE  
Circuit Court

-OF-

BALTIMORE CITY.

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

THE PETITION OF Susie Norris, defendant in the original  
bill and plaintiff in the cross-bill  
in this case, respectfully shows that she desire s to take testimony in this case, and  
respectfully pray s that leave be granted her to do so before one of the Standing  
Examiners of this Court.

*Howard Sweeten*  
Solicitor for Susie Norris

ORDERED, this <sup>th</sup> 12 day of May 1931, 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.

*H. Arthur Plump*

Docket B 172/1921

IN THE CIRCUIT COURT

Owen H. Norris

vs

Susie Norris

-----

Susie Norris

vs

Owen H. Norris

**DEPOSITIONS**

*R* No. *22335*

**PLAINTIFF'S COSTS**

Examiner	<i>11</i>	\$ 8.00
Copies		
Notices		
Sheriff		.60
Stenographer		1.50

\$ 10.10 Paid.

**DEFENDANT'S COSTS**

Examiner		\$
Copies		
Notices		
Sheriff		
Stenographer		

\$ \_\_\_\_\_

ALFRED J. CARR, Examiner

Filed *24* day of *May* 19 *21*



Owen H. Norris  
vs  
Susie Norris  
vs.  
Susie Norris  
vs  
Owen H. Norris

In the Circuit Court  
OF BALTIMORE CITY

The above entitled cause being at issue,

Bill

and notice having been given me by the Solicitor for the Plaintiff in Cross  
of a desire to take testimony in the same, I, ALFRED J. CARR, one of the  
Standing Examiners of the Circuit Court of Baltimore City, under and by virtue  
of an order of the above named Circuit Court, passed in said cause on the  
12th day of May 1921, met on  
the 14th day of May in the year nineteen  
hundred and twenty one at my office, in the City of Baltimore, in the State  
of Maryland, and assigned the 21st day of May  
in the same year at ten o'clock in the after - noon and the  
office of the Examiner, in the City and State  
aforesaid, as the time and place for such examination of witnesses in said cause;  
at which last mentioned time and place I attended, due notice of such meeting  
having been given, and proceeded in the presence of the Solicitor of the  
respective parties to take the following deposition, that

is to say:—

SUSIE NORRIS, the Plaintiff in the cross-bill, produced in her own behalf, being duly sworn, deposes and saith as follows:

BY THE EXAMINER:

1Q. State your name, residence and occupation, if any.

A- Susie Norris, Huntingtown, Calvert County, Maryland, and I am a School teacher.

2Q. Who are the parties to this suit?

A- I am the Plaintiff in the cross-bill, and Owen H. Norris is my husband.

BY MR. SWEETEN:

3Q. When, where and by whom were you married?

A- On December 30th, 1915, at 1629 West Lexington St., Baltimore, Maryland, by the Reverend Mr. S. E. Virgil, of the M. E. Church.

4Q. Were any children born of this marriage?

A- Yes.

5Q. Give their names and ages.

A- James O. Norris, four years old, Ophelia Norris, two years, and Irene Norris, who is now seven months of age

6Q. Who has the care and custody of these children?

A- The two older children are in the custody of my husband's mother, and the youngest child is with me.

7Q. Is it agreeable to you, in the event that you be decreed an absolute divorce from your husband, in this case, that the two older children shall remain with your husband's mother, and that you shall retain the care and

Susie Norris

custody of the youngest child, and Mr. Norris to pay you Two Dollars a week for its support ~~and~~ in accordance with the agreement executed by you and your husband and which I now offer in evidence?

A- It is.

Note: The Plaintiff here offers in evidence said Agreement to be marked Plaintiff's Exhibit Examiner #1).

8Q. Have you or not been a resident of the City of Baltimore, State of Maryland, for more than two years prior to April 15th, 1921?

A- Yes, I have.

9Q. And you live where?

A- At Huntingtown, Calvert County, Maryland.

10Q. Where does Mr. Norris live?

A- He lives in Baltimore City, at 1922 Pennsylvania Avenue, and is employed at Horn and Horn's lunch room as a waiter.

11Q. Are you and your husband now living together?

A- No.

12Q. When did you separate and which one left the other?

A- In July, 1919, he left me.

13Q. When was the last time that you had sexual relations with your husband?

A- Around Christmas, in December, 1919, at his mother's home, in Sykesville, Maryland.

14Q. As a result of your relations in December, 1919, the

Susie Norris

youngest child was born in September, 1920?

A- yes.

15Q. What, if anything, do you know about your husband having committed adultery with any women since the separation?

A- In January, 1920, I came to Baltimore to look for my husband, and was informed that he was living at 525 Mosher Street, and I went to that address, and inquired of Mr. and Mrs. Wilkes, who lived there, as to whether or not Mr. Norris resided at that address.

16Q. What did she tell you, Mrs. Wilkes? tell you?

A- She told me that Mr. Norris was living there, and had been living there under the name of Floyd with a woman whom he represented to her as his wife since September, 1919.

17Q. Then what happened?

A- I waited there until the woman whom Mr. Norris represented as his wife came home.

18Q. What conversation, if any, did you have with this woman?

A- She said that I was not his wife, and said that he - and that she knew nothing about him. She said "If you are his wife, why didn't you keep him when you had him?"

19Q. Did she or not at that time admit that she was living there with Mr. Norris as his wife?

A- She said she was living there with her husband, but she would not tell me who he was.

Susie Norris

20Q. Then what happened?

A- I went out, and later returned. At that time, my husband had gotten home.

21Q. Did you have any conversation with him?

A- Yes.

22Q. Was she present at the conversation?

A- My husband, and myself, and Mrs. Wilkes.

23Q. What, if anything, did you say to your husband?

A- I wanted to know what he was doing there, living with this woman.

24Q. What did he say to you?

A- He said he knew he had done wrong, and promised to do better.

25Q. Did he ever do better?

A- No, he did not.

26Q. Have you at any time, since you discovered your husband's adultery, lived with or cohabited with him?

A- No, I have not.

27Q. Have you always been a good faithful affectionate wife to your husband?

A- I have.

-----

QUESTION BY THE EXAMINER:

Do you know or can you state any other matter or thing that may be of benefit or advantage to the parties to this suit or either of them or that may be material to the subject of this your examination or the matters in question between the parties? If so, state the same fully and at large in your answer.

Answer:

*No*

*Susie E. Norris*

SADIE AYERS, a witness produced on behalf of the Plaintiff, being duly sworn, deposes and saith as follows:

BY THE EXAMINER:

1Q. State your name, residence and occupation, if any.

A- Miss Sadie Ayers, Morgan College, Baltimore, and I am a Student.

2Q. Do you know the parties to ~~this~~ suit?

A- I am a sister of Mrs. Norris, and sister-in-law of Mr. Norris.

BY MR. SWEETEN:

3Q. Were you present at their marriage?

A- I was not.

4Q. Do you know whether the parties to this suit were married, and lived together as man and wife, and recognized themselves as man and wife, and were known as man and wife?

A- Yes.

5Q. Has your sister been a resident of the City of Baltimore, State of Maryland, for more than two years prior to April 15th, 1921?

A- Yes, she has.

6Q. And she is living now where?

A- In Huntingtown, Calvert County, Maryland, teaching school.

7Q. Is Mr. Owen Norris a resident or a non-resident of the State of Maryland?

A- A resident. He lives in Baltimore, and works for Horn and Horn.

Sadie Ayers

8Q. Were any children born of their marriage?

A- Yes, three children. James, Ophelia, and Irene.

9Q. In whose custody are these children?

A- The two older children are with my sister's mother-in-law, and the youngest child is with my sister, Mrs. Norris.

10Q. Is she the fit and proper person to have the care and custody of this child?

A- She is.

11Q. To your knowledge, has Mrs. Norris been a good faithful wife to her husband?

A- She has.

12Q. When did they separate and which one left the other?

A- I think it was in July, 1919, that he left her.

-----



QUESTION BY THE EXAMINER:

Do you know or can you state any other matter or thing that may be of benefit or advantage to the parties to this suit or either of them or that may be material to the subject of this your examination or the matters in question between the parties? If so, state the same fully and at large in your answer.

Answer:

*No*  
*S. B. Ayers*

SARAH F. WILKES, a witness produced on behalf of the Plaintiff, being duly sworn, deposes and says as follows:

BY THE EXAMINER:

1Q. State your name, residence and occupation, if any.

A- Mrs. Sarah F. Wilkes, 525 Mosher Street, Baltimore, and I am a Housewife.

2Q. Do you know the parties to this suit?

A- I have known Mr. Norris since September, 1919, and Mrs. Norris since January, 1920, when she called at my house.

BY MR. SWEETEN:

3Q. Can you tell us when and how you became acquainted with Mr. Norris?

A- I had furnished rooms for rent, and a woman representing herself as the wife of Mr. Norris came and rented ~~three~~ ~~rooms~~ the third story back room, and he came at night, and they lived there until January, 1920, as man and wife, when Mr. Norris's wife came there, and Mr. Norris was not there. She saw the woman who lived with him as his wife. They had a conversation. Mrs. Norris went out, and came back later on, and she brought her husband back with her.

4Q. What did she say to him in your presence?

A- Mrs. Norris said she was No. 1. I asked him if she was his wife, and he said this was the only wife he had. I said "You told me a story." He did not say anything to that. I told him to get out. He could not stay in my house, and Sunday morning he went.

5Q. Was the room that Mr. Norris, the defendant in this

Sarah F. Wilkes

case, and the woman whom he represented as his wife in which they lived, a bed-room?

A- The back third story bed-room.

6Q. Look at the woman who is sitting there (indicating the Plaintiff in the cross-bill), the Plaintiff in this case, and state whether or not that is the woman that lived there with him from September until January.

A- No, she is not.

QUESTION BY THE EXAMINER:

Do you know or can you state any other matter or thing that may be of benefit or advantage to the parties to this suit or either of them or that may be material to the subject of this your examination or the matters in question between the parties? If so, state the same fully and at large in your answer.

Answer:

*No*

*Per  
Mark*

*Sarah Frances Wilkes*

*Attest  
a glen  
per the*

GEORGE W. WILKES, a witness produced on behalf of the Plaintiff, being duly sworn, deposes and saith as follows:

BY THE EXAMINER:

1Q. State your name, residence and occupation, if any.

A- George W. Wilkes, 525 Mosher Street, Baltimore, and I am a Janitor.

2Q. Do you know the parties to this suit?

A- I have known him since September, 1919, and I met Mrs. Norris, his wife in January, 1920.

BY MR. SWEETEN:

3Q. You are the husband of the last witness?

A- Yes.

4Q. You have been present during the taking of this testimony?

A- Yes.

5Q. You have heard what your wife said?

A- Yes.

6Q. If you were asked the same questions, would your answers be the same as hers?

A- The same.

7Q. Are you willing to adopt her testimony as your testimony?

A- Yes.

8Q. Are you willing to state that Mr. Norris and a woman that he represented to be his wife occupied the third story back room, bed room, at your house from September, 1919, to January, 1920?

A- Yes, that is the truth. - - - - 12


QUESTION BY THE EXAMINER:

Do you know or can you state any other matter or thing that may be of benefit or advantage to the parties to this suit or either of them or that may be material to the subject of this your examination or the matters in question between the parties? If so, state the same fully and at large in your answer.

Answer:

*No Geo H. Hines*

No other witnesses being named or produced before me, I then at the request of the solicitor s of the respective parties closed the depositions taken in said cause, and now return them closed under my hand and seal on this 24<sup>th</sup> day of May in the year of our Lord nineteen hundred and twenty one at the City of Baltimore in the State of Maryland.

Alfred J. Carr   
Examiner.

There are one Exhibits with these depositions, to wit:

Plaintiff's Exhibit Examiner No 1

Defendant's Exhibit

Alfred J. Carr  
Examiner.

I, ALFRED J. CARR, the Examiner before whom the foregoing depositions were taken, do hereby certify that I was employed in assigning a day, and taking the said depositions upon two days, on both of which I was employed by the plaintiff \_\_\_\_\_, and on none by the defendant \_\_\_\_\_.

Alfred J. Carr  
Examiner.

Let. let. B<sup>172</sup>/<sub>1921</sub>

Norris  
vs  
Norris

PLAINTIFF EXHIBIT,  
EXAMINER, No. 1

FILED WITH THE EXAMINER  
the 21 day of May 1921  
Alfred J. Carr  
Examiner.

B 2 2 3 3 5  
12

Pl 24 May 11921



Owen H. Norris	::	In the
Vs	::	
Susie Norris	::	Circuit Court
and	::	
Susie Norris	::	of
Vs	::	Baltimore City.
Owen H. Norris	::	

It is agreed in the above entitled cause, with the approval of the Court, in the event that Susie Norris be granted a divorce a vinculo matrimonii from the said Owen H. Norris, on grounds justifying the same, that Irene Norris, the youngest of the children of the parties hereto, shall be awarded unto the custody of said Susie Norris, and that said Owen H. Norris shall pay the sum of \$2.00 per week hereafter for the maintenance and support of said child.

And it is further agreed that James O. Norris and Ophelia Norris, the two older children of the parties hereto, shall remain in the custody of their paternal grandmother, with whom they now reside, the said Owen H. Norris to maintain and support them, and that said Susie Norris shall have access to and have said two older children in her custody at all reasonable times hereafter.

Witness the signatures of the parties hereto.

*plaintiff* Owen H. Norris  
 Defendant in Original Bill  
 and Plaintiff in Cross-Bill.  
*Defendant*

*Defendant* Susie E. Norris  
 Plaintiff in Original Bill  
 and Defendant in Cross-Bill.  
*Plaintiff*

I, the undersigned, the paternal grandmother of the children mentioned in the annexed stipulation, do hereby certify that I have read the same, and that I am willing to retain the custody of the two older children, in accordance with the terms thereof.

*Laura X. Norris*  
*her*  
*mark*

Paternal Grandmother.

*Test*

*Columbus, N. H.*

Circuit Court

172  
19 21 B Docket No. 61

Owen H. Norris

vs.

Susie Norris

and Cross-Bill

SUBMISSION FOR DECREE.

*B 22335*  
Mr. Clerk,

Please file,

*13*  
*Howard Sweeten*

Solicitor for Plaintiff.  
in Cross-Bill

No. \_\_\_\_\_

Filed 24 May 1921

Owen H. Norris

vs.

Susie Norris

and Cross-Bill

*In the Circuit Court  
of Baltimore City*

May TERM 19 21

To the Honorable

Charles W. Heuisler

Judge of Said Court:

The above cause is respectfully submitted for  
decree and the 43rd General Equity Rule is hereby waived.

*Harry O'Brien*

Solicitor for Plaintiff,  
in original bill  
and defendant in  
Cross-Bill

*Howard Sweeten*

Solicitor for Defendant.  
in original bill  
and plaintiff in  
Cross-Bill

Circuit Court

172  
1921 B Docket No. 61

Owen H. Norris

vs.

Susie Norris  
and Cross-Bill

Order of Reference  
and Report

*[Handwritten signature]*  
*B 22335*

No. \_\_\_\_\_

*14*

Order Filed *24* day of *May* 19*21*  
Report Filed \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

Owen H. Norris

vs.

Susie Norris

and Cross-Bill

IN THE  
Circuit Court

OF

BALTIMORE CITY

May

Term, 19 21

*20/21*

This case being submitted, without argument, it is ordered by the Court, this  
day of *May*, 19 21, that the same be and it is hereby referred to  
*Hard B Coe*, Esq., Auditor and Master, to report the  
pleadings and the facts, and his opinion thereon.

*Hard B Coe*

Report of Auditor and Master

Bill for divorce a vinculo matrimonii and for the custody  
of two of the minor children of the parties filed by the husband against  
his wife on the ground of adultery; and cross bill for divorce a vinculo  
matrimonii, for the custody of all of the minor children of the parties  
and for permanent alimony filed by the wife against her husband on the  
same ground. Code 1911, Art. 16, secs. 36-41.

Defendant to each bill summoned and answers by solicitor.  
Testimony taken on behalf of plaintiff in cross bill.

Residence of plaintiff in cross bill in Maryland for more  
than two years proven.

The marriage proven.

The adultery of defendant to cross bill proven.

An agreement between the parties touching the custody and  
support of the children has been filed and its terms are substantially  
incorporated in the decree submitted.

More than thirty days have elapsed since the filing of  
the cross bill.

Case submitted and ready for decree.

*Hard B Coe*

Auditor and Master.

Fee \$9 paid.

May 24th, 1921.

CIRCUIT COURT

B-172-

1921.

No. 61 Docket

OWEN H. NORRIS

-VS-

SUSIE NORRIS

CROSS BILL.

VS:

SUSIE NORRIS

-VS-

OWEN H. NORRIS.

Recorded

Folio 317 1921

Decree of Divorce

B 22335

B No.

(15)

fd 21 December 1921

The within is a proper decree to be passed in this case.

*Ward B. Cue*

Auditor and Master.

Decree of Divorce

IN THE

**Circuit Court**

OF

BALTIMORE CITY

OWEN H. NORRIS

-vs-

SUSIE NORRIS

CROSS BILL.

~~VS~~

SUSIE NORRIS

-vs-

OWEN H. NORRIS

*November* Term, 19 *21*

This cause standing ready for hearing and being duly submitted, the proceedings were by the Court read and considered.

It is thereupon, this *21<sup>st</sup>* day of *December*, A. D. 1921

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said *Susie Norris*

*in the cross bill*  
the above named Complainant *be* and she is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, *to the cross bill*, the said Owen H. Norris; and that the original bill of Owen H. Norris vs. Susie Norris *be* and the same is hereby dismissed.

AND IT IS FURTHER ORDERED that said Susie Norris shall have the guardianship and custody of Irene Norris, one of the minor children of the parties in the proceedings mentioned, and that said Owen H. Norris shall pay said Susie Norris the sum of \$2 per week, accounting from the date of this decree, for the support and maintenance of said minor child, until the further order of this Court.

AND IT IS FURTHER ORDERED that Mrs. Laura Norris, mother of Owen H. Norris, shall have the guardianship and custody of James O. Norris and Ophelia Norris, the other minor children of said parties, with privilege to said Susie Norris to have access to and have said children with her at all reasonable times, and that said Owen H. Norris shall be charged with the support and maintenance of said two children, until the further order of this Court.

And it is further Ordered, That the said *Owen H. Norris* pay the cost of this proceeding.

*H. Arthur Stump*



Serve on

Ct. Ct.

*1922*

B 172  
1921

Owen Norris, (colored)  
Sykesville,  
Carroll County, Md.

Susie Norris

vs.

Owen Norris

ORDER OF COURT

*B 22 335*

No. .... B.

*(16)*

Filed *27* March 19*22*

*Summond and  
left Copy Order of  
Court with the  
Defendant on  
28<sup>th</sup> day March 1922*

*E Edward Martin  
Shriff*

*Shriff's fee .80*

Susie Norris

IN THE

CIRCUIT COURT

vs.

OF

Owen Norris

BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this <sup>27</sup> day of March 1922

that the defendant, Owen Norris, appear before this Court in person,

on the 3 day of April 1922, 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 decree

the Order of this Court passed on the 21st day of December 1921 directing the

\$2.00 per week

payment of Alimony, pendente lite, by him to the plaintiff, Susie Norris, for the support of their child

provided a copy of this Order be served on the said Owen Norris

on or before the 31 day of ~~April~~ March 1922.

Carroll J. Bond

21 Dec. 1921. Decree for \$2.00 per week for support of child.

No payments made under said decree.

13 weeks arrearages at \$2.00 per week - \$26.00.

Not payable thru Prisoners Aid Ass'n.

Rec'd 3/28/22  
at 8 o'clock A M and  
forwith delivered the same to  
the Sheriff of Carroll County.  
Per S. M. Miller Clerk

Serve on

Owen H. Norris (colored)

Sykesville, Carroll Co., Md.

Ct. Ct.

B <sup>132</sup>  
192

Susie E. Norris

vs.

Owen H. Norris

Received the 6<sup>th</sup> day of July 19<sup>22</sup>  
& forthwith delivered to Sheriff of Carroll Co  
*Edward M. Martin*  
Clerk

ORDER OF COURT

B 22335

No. <sup>17</sup> B.

Filed 1 July 192 2

Summons and  
Copy of Order left  
with Owen H. Norris

E. Edward Martin  
Sheriff

Sheriff fee .80

SUSIE E. NORRIS

vs

OWEN H. NORRIS

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this <sup>12<sup>th</sup></sup> day of July 1922

that the defendant, Owen H. Norris appear before this Court in person,

on the <sup>17</sup> day of July, 1922 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 obey-

**Decree**

ing the ~~Order~~ of this Court passed on the 21st day of December, 1921, directing the

payment of **\$2 per week for support of child** ~~Alimony pendente lite~~, by him to the plaintiff, Susie E. Norris

provided a copy of this Order be served on the said defendant

on or before the <sup>14<sup>th</sup></sup> day of July, 1922.

*James P. Gorter*

10 weeks arrearages,  
 from April 10 to June 26, 1922 ----- \$20.00  
*not payable thru Prisoners Aid Assn*

3/12/14/23

IN THE ~~CIRCUIT~~ <sup>61</sup> COURT <sup>42</sup>  
BALTIMORE CITY. 1921

~~172~~  
~~OWEN H. NORRIS~~  
~~VS.~~

SUSIE NORRIS  
(Cross Bill)  
SUSIE NORRIS  
VS.  
OWEN H. NORRIS

P E T I T I O N  
(1) order

Mr. Clerk:-  
Please file.

Davis and Evans  
ATTORNEYS FOR PETITIONER  
19-22335  
p2471 (18)

J. STEWARD DAVIS  
ATTORNEY AT LAW  
215 SAINT PAUL PLACE  
BALTIMORE, MD.

Ad 20 Oct 1921

Now Ent John E. Potee Sheriff

OWEN H. NORRIS

VS.

:

IN THE CIRCUIT COURT

SUSIE NORRIS

(Cross Bill)

SUSIE NORRIS

:

OF

VS.

OWEN H. NORRIS

:

BALTIMORE CITY.

---

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Petitioner complaining respectfully says:

1. That on the 21st day of December, 1921, the petitioner was divorced A Vinculo Matrimonii from the said Owen H. Norris, by this Honorable Court, and that in said decree divorcing your petitioner, the custody of James Norris and Ophelia Norris (minor children of Owen H. Norris and your petitioner) was granted unto Laura Norris, mother of Owen H. Norris.
2. That the said Laura Norris, mother of Owen Norris, has since died; and that Ophelia Norris is now with your petitioner, and James Norris is with his father Owen Norris.
3. That the conditions at the home of the said James Norris are such that preclude the home from being a fit and proper place for the rearing of a child, the age of the aforementioned James Norris.

WHEREFORE YOUR PETITIONER PRAYS:

- (a) That the decree as passed the 21st day of December, 1921 be amended so as to grant the care and custody of Ophelia Norris and James Norris to Susie Norris.
- (b) Such other and further relief as the case may require.

*Davis and Evans*  
Attorneys for Petitioner

Ordered this 20<sup>th</sup> day of October 1924 by the Circuit  
Court of Baltimore City that ~~the decree in the aforementioned case~~  
~~be amended as prayed unless cause to the contrary be shown on or~~  
~~before the~~ day of ~~1924.~~ to be read in the  
said Court. ~~Term in a v. m. October 27<sup>th</sup> 1924~~  
Charles F. Stone

Owen H. Norris

VS.

Susie Norris  
( Cross Bill)

Susie Norris

VS.

Owen H. Norris

In The

Circuit Court

Of Baltimore City.

-----

Ordered this 20th day of October 1924, by the Circuit Court of Baltimore City that Owen H. Norris, show cause on or before November 3rd 1924, why prayer in this Petition should not be granted, a copy of this Order to be served on the said Owen H. Norris, on or before October 27th 1924.

Charles F. Stein

TRUE COPY  
TEST,

*Chas R. Whiteford* CLERK