

3/12/14/2

In The Circuit Court
No 632
Baltimore City

Edward Parry

vs

Uola Parry

Bills Annulment of
Marriage

vs (with plea of)

Henry J. Parry

B 21688

(1)

DAVIS & BISHOP
ATTORNEYS AT LAW
118 1/2 LEXINGTON STREET
BALTIMORE, MD.

Edw Parry 1920

Edward Parago

In The Circuit Court

Vs.

of

Viola Parago

Baltimore City.

To The Honorable, The Judge of Said Court:

Your Orator complaining, respectfully states,

FIRST, That on or about the 12th. day of April, 1919, at which time your Orator was a infant, a license for your orator to wed Viola Jones of the city of Baltimore, state of Maryland was issued at the request of persons other than your petitioner.

SECOND, That on or about the 12th. day of April 1919 upon the coercion of others, your orator appeared before one Rev. McCoy, a Methodist minister of the gospel in Baltimore city, which same minister attempted the preliminaries of a marriage ceremony; that in answer to the question by said minister; To wit: "Do you take this woman for your lawful and wedded wife", your orator answered, "No, I do not want to get married", that the said Viola Jones in answer to the question by said minister, to wit: "What about this", said, "It does not matter to me what is done", that the said Viola Jones at no time in the presence of said minister consented to nor agreed to marry your orator.

THIRD, That both parties to this suit are residents of the city of Baltimore and have been for more than two years prior to the filing of this bill of complaint.

FOURTH, That your petitioner has never live^d with nor co-habited with the said Viola Jones either on April 12th. 1919 or subsequent thereto; that your petitioner has always publicly and private^{ly} denied that the said Viola Jones was his wife nor has he^{ever} held her out in the community as his wife.

FIFTH, That neither your petitioner nor the respondent have ever enter^{ed} into nor have they consented to any marriage as between themselves.

SIXTH, That the conduct of your orator has always been honest and above reproach.

WHEREFORE YOUR PETITIONER PRAYS:

a-a That the said marriage between the complainant and defendant be declared null and void, ab initio and of no effect.

b-b That the complainant may be restored to his rights as existed before said marriage.

c-c That he may have such other and further relief, as may be equitable.

May it please your honor to grant unto your Orator a writ of subpoena directed unto the said respondent commanding her to be or appear in this court on some day certain to be named therein and to perform such decree as may be had on the premises.

* Edward Parago.

(C. Paul Jones)
Solicitor for Plaintiff

And as in duty bound etc.

Complainant

Solicitor For Complainant.

State of Maryland }
 } To Wit:
Baltimore City }

I hereby certify that on this 11th day of October 1920, before me the subscriber, a notary Public in and for Baltimore city, state of Maryland, personally appeared Edward Parago, the complainant in the foregoing bill and made oath in due form of law that the matter contained in the same was true to the best of his knowledge and belief.

Arthur N. Rogers

Notary Public.

349

633 Blev

Ct. Ct.

192

Docket No.

Parago
Parago

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Pr
B 218 Dolphin
21688

(2)

Filed

22 Oct

1920

J S Davis

SOLICITOR

10

Summoned and a copy of the Process served with the
defendant

Thomas F. McWalter
Attorneys

(Kelly)
Fees \$0.50
10/20/20

EQUITY SUBPOENA

The State of Maryland

To

Anna Parago

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said City, on the second Monday of *November* 192*0*, to answer the complaint of

Edward Parago

against you in said Court exhibited.

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 *13* day of *Sept* 192*0*

Issued the *18* day of *October* in the year 192*0*

Chas. R. Whiteford Clerk.

Notice to the person summoned:

"Personal attendance in Court on the day named in the above writ is not required; but unless within fifteen (15) days after the return day, legal defense is made in the above mentioned suit a Judgment by default may be entered against you."

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

B633
EDWARD PARAGO, 1920

v.

VIOLA PARAGO.

"Answer"

Mr. Clerk:

Please file, etc.,

Richard Stevenson
Solicitor for respondent.

B 21688

HARRY B. WOLF
ATTORNEY AT LAW

110-112 E. LEXINGTON ST.

BALTIMORE, MD.

fd 3 nov 1920

EDWARD PARAGO,

*

v.

*

IN THE CIRCUIT COURT OF

*

BALTIMORE CITY.

*

VIOLA PARAGO.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Answer of Viola Parago, to the Bill of Complaint heretofore filed against her, respectfully represents:

- (1) Answering paragraph One this respondent admits that a license was duly issued on or about the 12th. day of April, 1919, for the marriage of the complainant and your respondent, but says that said license was issued to the parents of the complainant and with his full knowledge and consent.
- (2) Your respondent denies all and singular the allegations of paragraph Two, and further answering said paragraph says that the complainant fully and freely entered into said ceremony and freely consented to marry your respondent.
- (3) Your respondent admits the allegations contained in paragraph Three.
- (4) Your respondent denies the allegations contained in paragraph Four and Five.
- (5) Your respondent neither admits nor denies the allegations contained in paragraph Six.

Having answered fully she prays that said bill may be hence dismissed.

Richard A. Stevenson
Solicitor for respondent.

+ *Viola Parago*

STATE OF MARYLAND,

CITY OF BALTIMORE, To Wit:

I HEREBY CERTIFY, That on this 25th day of October, 1920, before me, the subscriber, a Notary Public in and for the State and City aforesaid personally appeared Viola Parago, 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.

Robert J. Schuster
Notary Public.

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

B 633
EDWARD PARAGO, *1900*

v.

VIOLA PARAGO.

"Petition & Order"

633
Mr. Clerk:

Please file, etc.,

Richard Stevenson
Solicitor for petitioner.

B 21688

(4)
HARRY B. WOLF
ATTORNEY AT LAW
110-112 E. LEXINGTON ST.

BALTIMORE, MD.

A 3 Nov 1900

EDWARD PARAGO,

*

v.

*

IN THE CIRCUIT COURT OF

*

BALTIMORE CITY.

*

VIOLA PARAGO.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The petition of Viola Parago, respectfully represents:

- (1) That heretofore her husband, the said Edward Parago, filed his bill of complaint in this cause asking that the marriage entered into between the parties may be declared null and void.
- (2) That your petitioner has answered said bill of complaint emphatically denying the material allegations therein.
- (3) That her husband, the said Edward Parago, is employed as a Porter, and is in receipt of a salary of at least \$15. per week, while your oratrix, except for the small sum she is able to earn as a result of her own labor, is destitute of means of supporting herself during the pendency of this suit or of defraying the costs thereof.

Wherefore your petitioner prays that an order may be passed directing the said Edward Parago, to pay to your petitioner a reasonable sum for her support and maintenance and to pay to her counsel a reasonable sum as a counsel fee.

Richard Stevenson
Solicitor for petitioner.

Viola Parago.

STATE OF MARYLAND,

CITY OF BALTIMORE, To Wit:

I HEREBY CERTIFY, That on this ^{25th} day of October, 1920, before me, the subscriber, a Notary Public in and for the State and City aforesaid personally appeared Viola Parago, 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.

Docket 633
1920

Circuit Court

Parago
Amels vs. Parago
234 Pa Ave

Order Counsel Fee and Alimony

Pendente Lite

B-21688
No.

\$1.50 (5) Wolk
no children
H. B. Wolk

pd 4 Nov 1920
10

Copy of the within Order of Court served on
Edward Parago on the 8th day of November 1920
in presence of Peter & Ring.

Thomas J. M. Pulty
Sheriff

Gen \$0.50

Edward Parago

vs

Viola Parago

-IN THE-

CIRCUIT COURT

-OF-

BALTIMORE CITY

September

TERM 1920

ORDERED BY THE COURT this 4th day of November 1920

that the Plaintiff Edward Parago

pay to the Defendant Viola Parago

the sum of fifteen Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of five

Dollars per week, during the continuance of this suit, to the said Defendant Viola Parago

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 19

day of November 1920, provided a copy of this Order be served on the said Plaintiff

Edward Parago on or before the 12

day of November 1920

Robert J. Stanton

TRUE COPY—TEST:

CLERK

Circuit Court

633 Blo

192 0

Docket.....

Edward Parago

vs.

Viola Parago

Petition for leave to take
Testimony and Order of
Court thereon

1921688

No.....

(6)

Filed

17 Nov

1920

Edward Parago

vs.

U cola Parago

IN THE

Circuit Court

OF

BALTIMORE CITY

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

THE PETITION OF

Edward Parago

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

Wm. J. Davis
Solicitor for *Parago*

ORDERED, this *17th* day of *November* 192*0*, 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.

Robert F. Stanton

J. S. Davis

54

CIRCUIT COURT

633
1920

B Docket No. 60

Parago
vs.

Parago

Can

PETITION AND ORDER TO
TAKE TESTIMONY UN-
DER 35th RULE

B 21688
No.

(7)

Fd 23 Nov 19 20

Copy of the within Petition and Order of Court
served on J. Steward Davis Solicitor on the 27th
day of November 1920 in presence of Harry B. Gray
Thomas J. McNulty
Sheriff

Fees \$0.50

Served on,
J. S. Davis
118 29th St

Richard H. Stevens

CIRCUIT COURT
BALTIMORE CITY

Edward Parago,

vs.

Viola Parago

IN THE
Circuit Court
OF
BALTIMORE CITY

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

The ~~plaintiff~~ ^{defendant} 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 case made and provided.

And as in duty bound will ever pray.

Richard Stevenson
Solicitor for Plaintiff.

defendant

Upon the foregoing Petition and Application it is this 23rd day of November
A. D., 1970, 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 Plaintiff or his Solicitor, on or be-
fore the 30 day of November 1970

Robert F. Lawton

638
1970

Ct. Ct.

Docket 60

Parago

vs.

Parago

SUMMONS FOR WITNESSES

B. No. 21688

18

Filed

day of

25 July 19 72

In the Circuit Court of Baltimore City

The State and James Paragon the following named

June 13

7 10 A. M.

RECORDED IN THE OFFICE OF THE CLERK OF THE CIRCUIT COURT OF BALTIMORE CITY

In the Circuit Court of Baltimore City

Term, 19 _____

The Sheriff will please summon the following witnesses,

returnable _____

Feb 27 - 1922

at 10 A. M.

Multiple horizontal lines for listing witnesses.

to testify for _____

*Defendant
Parogo*

in the case of _____

vs. _____

Parogo

Charles H. Huleford
CLERK OF CIRCUIT COURT OF BALTIMORE CITY

633
1970

Ct. Ct.
Docket 60

Parogo

vs.
Parogo

SUMMONS FOR WITNESSES

Ⓟ No. 21688

19

6 March 1972
Filed day of

In the Circuit Court of Baltimore City

Term, 19 _____

The Sheriff will please summon the following witnesses,

returnable March 7 - 1922 at 10 A. M.

[Lined area for listing witnesses]

to testify for Defendant
in the case of Parogo

vs. Parogo
Clark Whiteford
CLERK OF CIRCUIT COURT OF BALTIMORE CITY

EDWARD PARAGO

vs.

VIOLA PARAGO

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IN THE CIRCUIT COURT
BALTIMORE CITY.

Mr. clerk:

Please issue summons for the following witnesses to testify for the
defendant in the above entitled cause and make the same returnable the *7th* day
of *March* 1922 at 10 A.M.

Mrs. Viola Parago *sd*

218 W. Dolphin Street

Rev. J. W. McCoy *sd*

1124 Pennsylvania Avenue,

Robert A. Stevenson
attorney for defendant.

633
1920

Ct. Ct.
Docket 60

Pargo

vs.

Pargo

SUMMONS FOR WITNESSES

Ⓟ No. 21688

10

Filed 6 day of March 1921

In the Circuit Court of Baltimore City

January Term, 1922

The Sheriff will please summon the following witnesses,

returnable Monday March 6. 1922 at 10 A. M.

[Lined area for listing witnesses]

to testify for Defendant

in the case of Parago vs. Parago

Charles R. Whippleford
CLERK OF CIRCUIT COURT OF BALTIMORE CITY

EDWARD PARAGO

vs.

VIOLA PARAGO

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::

IN THE CIRCUIT COURT
BALTIMORE CITY.

Mr. clerk:

Please issue summons for the following witnesses to testify for the defendant in the above entitled cause and make the same returnable the 6 day of *March* 1922 at 10 A.M.

10 # Mrs. Viola Parago *sd*
10 Rev. J. W. McCoy *sd*

218 W. Dolphin Street
1124 Pennsylvania Avenue,

Samuel H. [Signature]
Attorney for defendant,

J. Steward Davis

Serve on

R.H. Stevenson

55
###

110 E. Lexington

R. H. Stevenson

CIRCUIT COURT

633
19 W

Docket No.

Edward Parago
VS.

Ocolo Parago

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

No. B21688

Fd 17 July 1978

54
Copy of the within Petition and Order of Court
served on Richard H. Stevenson, the
day of July 1978, in the presence of Lawrence A. Zovak,
Thomas J. Mc. Kelly
Sheriff

Edward Parag

vs.
Viola Parag

IN THE
Circuit Court
OF
BALTIMORE CITY

To the Honorable the Judge of the
Circuit Court 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 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.

Upon the foregoing Petition and Application it is this 17th day of July
A. D., 1923, 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 day of July 1923