

In The Circuit Court
of B 142
Baltimore City 1921

Clara May Parker

vs

Joseph Parker

Bill for Divorce & Alimony

Mr Clerk please file

~~John~~ Law

B 22275
1

DAVIS & BISHOP
ATTORNEYS AT LAW

BANNEKER BUILDING

17 E. LEASSET STREET
BALTIMORE, MD.

Filed 17 March 1921

Olelia May Parker

In The Circuit Court

vs.

of

Joseph Parker

Baltimore City.

To The Honorable, The Judge of Said Court:

Your oratrix, complaining respectfully says,

FIRST, that the parties hereto were married on or about the 12th. day of November, A.D. 1918 in the City of Baltimore, Maryland and lived together as man and wife until on or about June 28th 1919

SECOND, that both parties are residents of the city of Baltimore, State of Maryland and have been for more than two years prior to the filing of this bill of complaint.

THIRD, That though the conduct of your oratrix toward her husband has always been kind, affectionate and above reproach, he without any just cause or reason abandoned your oratrix to live in adultery with lewd and abandoned women whose names are unknown to your oratrix.

FOURTH, That your oratrix has never condoned nor forgiven the said adultery. That she has never cohabited with the said respondent since the adultery.

FIFTH, That there are no children born as a result of said marriage.

THEREFORE YOUR ORATRIX PRAYS:

a-a A divorce a vinculo matrimonii from the respondent.

b-b Such other and further relief as the case may require.

May it please your Honor to grant unto your oratrix a writ of subpoena, directed unto the said respondent, commanding him to be or appear in th~~e~~is Court on some day certain to be named therein, to perform such decree as may be passed in the premises.

As in duty bound etc.

Olivia May Parker

Complainant

(C. R. J. Law)

Solicitors For Complainant.

544

Ct. Ct.

142/1601
1921

Docket No.

Parker

Parker

143 Laurens St

SUBPOENA TO ANSWER BILL OF COMPLAINT

B

Pro

No.

22275

2

Filed

11 June 1921

J. S. Davis

SOLICITOR

11

For Exec -
Thomas A. McQuitty
(Noted.)
Shank

EQUITY SUBPOENA

The State of Maryland

To

Joseph Parker

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

Olivia M. Parker

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 17 day of March, 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.)

Ct. Ct.

192

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed 192

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

On

Joseph Parker



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

Olivia M. Parker

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 17 day of March, 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

BALTIMORE CITY

B 142
144 *1921*

Olelia May Parker

vs.

Joseph Parker.

- ANSWER -

B 22275

Mr. Clerk: *B*

Please file &c.,

Roy S. Bond
Sol. for Defendant.

ROY S. BOND
ATTORNEY AT LAW
215 ST. PAUL PLACE
BALTIMORE, MD.

FILED

5 Apr 1921

Olelia May Parker ,

vs.

Joseph Parker ' ,

IN THE CIRCUIT COURT
OF
BALTIMORE CITY.

-TO THE HONORABLE, THE JUDGE OF SAID COURT:-

Your Respondent in answer to the Bill of Complaint filed against him respectfully says:

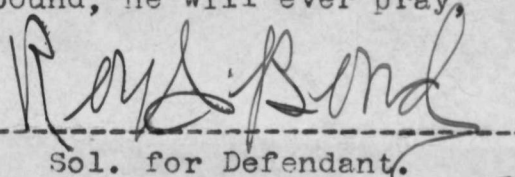
FIRST: He admits the first and fifth paragraphs of the Plaintiff's Bill.

SECOND: He admits that he has been a resident of Baltimore City for more than two years prior to the filing of this Bill of Complaint, but he does not know whether his wife is a resident of Baltimore City, State of Maryland or not, but if the same be material to the defendant's rights in this case, he requires strict and legal proof of same.

THIRD: He most emphatically denies the third, and fourth paragraphs of said bill and to the contrary says, that he has never committed adultery and has always been a good, kind, true husband to his wife. He denies that her conduct was kind and affectionate and to the contrary says, that she was cruel and exceedingly jealous.

Having answered all the material allegations of the said bill, in so far as he is advised is material, he respectfully prays that the Plaintiff's Bill be dismissed.

As in duty bound, he will ever pray,



Sol. for Defendant.

KNOW ALL MEN BY THESE PRESENTS, that I, Joseph Parker, of the City of Baltimore, State of Maryland, do constitute and appoint Roy S. Bond, as my true and lawful Attorney in the matter of the divorce case of Olelia May Parker versus Joseph Parker, hereby granting unto my Attorney all power to act in every compacity for me in the same and declaring the said Roy S. Bond, my only true and lawful Attorney.

IN WITNESS WHEREOF, I set my hand and Seal this.. *2nd* day of *April* 1921.

.....
Defendant.

Joseph Parker
.....
Defendant.

Joseph Parker

Hv

CIRCUIT COURT

142 861
19 21 Docket No.

Oliver May Baker

vs.

Joseph Baker

Order

19

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

John
No. B 22275

<4>

Fd 12 June 1921

CIRCUIT COURT
BALTIMORE CITY

Olivia May Parker

vs.

Joseph Parker

IN THE
Circuit Court
OF
BALTIMORE CITY

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

THE PETITION OF *the plaintiff, Olivia May Parker*

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.

(Signature)
Solicitor for *plaintiff*

ORDERED, this *12th* day of *April* 19*21*, 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.

Charles H. Kinsler

Doc. B 142
1921

3/21/14/22

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Olivia May Parker

vs.

Joseph Parker

No. 202075B

PLAINTIFF'S COSTS

Examiners.....\$ 8⁰⁰
Copies.....
Sheriff.....
Stenographer.....1⁰⁰
\$ 9⁰⁰

DEFENDANT'S COSTS

Examiners.....\$
Copies.....
Sheriff.....
Stenographer.....
\$

At 2 May 1921

Olivia May Parker

vs.

Joseph Parker

In the Circuit Court
OF BALTIMORE CITY.

The above cause being at issue

and notice having been given me by the Solicitor for the *plaintiff*
of a desire to take testimony in the same, I, A. de RUSSY SAPPINGTON, one
of the Standing Examiners of the Circuit Courts of Baltimore City, under and by
virtue of an order of the above named Circuit Court, passed in said cause on the
twelfth day of *April* 19*21*, met on
the *twenty-fifth* day of *April* in the year nineteen
hundred and *twenty-one* at my office, in the City of Baltimore, in the State
of Maryland, and assigned the *twenty-sixth* day of *April*
in the same year at *twelve* o'clock in the ~~in the~~ noon and the
office of *Messrs. Davis & Bishop* 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
plaintiff.....to take the following depositions, that
is to say:—

8-1

Olelia May Parker

vs.

Joseph Parker.

Testimony taken at the office J. Stewart Davis,
Esquire, 14 E. Pleasants Street, Baltimore, Maryland, on
April 26th, 1921 at 12 N.

-----)

OLELIA MAY PARKER the Plaintiff in this case, pro-
duced on her own behalf having been first duly sworn, de-
poseth and saith as follows, that is to say:

BY THE EXAMINER:

1 Q. State your name, residence and occupation.

A. Olelia May Parker, 1635 E. Madison Street.
no occupation.

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

A. I am the Plaintiff and the Defendant is my
husband.

BY MR. DAVIS:

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

A. November 12th, 1918 in Baltimore City, by the
Reverend Simon Williams.

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

Olelia May Parker.

-2-

A. We lived together until June 28th, 1919, when he beat me and made me leave. He beat me and cut my head and tried to throw me down the steps. He ordered me out of the house and made me leave. I had to go to St. Joseph's Hospital and they took seven stitches in my head and he was arrested and find \$10. and costs the next morning for beating me.

3 Q. He refused also to let you return?

A. Yes and when I went back on Monday he had my things separated and put aside and the gas range disconnected and told me that if I did not get my things out by the next morning he would put them in the street.

4 Q. What did he do after he put you out?

A. He brought another woman in and lived with her as man and wife. I don't know her name. She was a woman who had lived a few doors below us. She occupied the same room with him in which he and I had slept.

5 Q. How long did they live there together?

A. About six months. After she left he went back and lived with a former wife from whom he had been divorced and he is now living with her at Laurens and Division Streets. 543 Laurens Street.

Olelia May Parker.

-3-

6 Q. Have you been a resident of the state of Maryland for more than two years prior to the filing of your Bill?

A. Yes and my husband had also lived here for more than two years before the filing of this Bill.

7 Q. What was your conduct towards your husband?

A. I was kind, affectionate and faithful to him and did a wife's part and gave him no reason or cause to treat me as he did.

8 Q. Have you condoned or forgiven his adultery?

A. No, and I have not lived with him.

9 Q. Are there any children of this marriage?

A. No.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of 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 quest on between the parties? If so, state the same fully and at large in your answer.

A.--- *no*

Olivia May Parker

SUSIE MCKENNY, a witness of lawful age, produced on behalf of the Plaintiff, having been first duly sworn, deposeseth and saith as follows, that is to say:

BY THE EXAMINER:

1 Q. State your name, residence and occupation?

A. Susie McKinney, 1050 N. Durham Street. Hair dresser.

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

A. Yes. I have known him some time and her from before her marriage.

BY MR. DAVIS:

1 Q. Were you present at their wedding?

A. No. I know they were married. I was renting from Mr. Parker at that time. He brought her home and introduced her as his wife. They lived together as man and wife and their friends and church people all treated them as married people.

2 Q. Are they living together now?

A. No. He beat her and drove her out of the house June 28th, 1919 and he refused to permit her to return. I tried to stop him treating her and he told me to attend to my own damned business as he was attending to his. He cut her head and she had to go to the hospital and later he was arrested. She came back and he had

Susie McKinney.

-6-

separated all her things and I heard him say he would put them out if she did not take them. She then took her things and he brought another woman in right off and they lived together for about six months. I moved away after he brought the woman and she was there when I left. The occupied the same room and bed.

3 Q. Was Mrs. Parker a resident of Baltimore City, Maryland for more than two years prior to the filing of the bill?

A. Yes. She was and he was too.

4 Q. What was her conduct towards her husband?

A. She was kind, affectionate and a good and faithful wife to him.

5 Q. Has she ever condoned or forgiven his adultery?

A. No.

6 Q. Did she give him any cause or reason to drive her out?

A. No.

7 Q. Are there any children as the result of this marriage?

A. No.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of 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.

A.--- No Susie McKinney

No other witnesses being named or produced before me, I then, at the request of the Solicitor.....of the plaintiff..... closed the depositions taken in said cause and now return them closed under my hand and seal, on this 2nd day of Apr May in the year of Our Lord nineteen hundred and twenty-one at the City of Baltimore, in the State of Maryland.

A. de Russey Sappington (SEAL).
Examiner.

There are two Exhibits with these depositions, to wit:

Plaintiff's.....Exhibit 1

Defendant's.....Exhibit 1

A. de Russey Sappington
Examiner.

I, A. de RUSSY SAPPINGTON, 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.....

A. de Russey Sappington
Examiner.

1732 Ashland a
at Shutter St
in Business
Coal & Wood

27

Ct. Ct.

142
1921 Docket No. 61

Parker
Parker

543 Laurens St

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pro

No. 322275
(5)

Filed 25 April 1921

J. S. Davis SOLICITOR

11

Summoned and a copy of the process left
with the defendant,
Thomas F. McKinley
Sheriff

(McKinley) Fee \$0.80

4/21/21

EQUITY SUBPOENA

The State of Maryland

On JOSEPH PARKER

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

Olivia May Parker

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 MAY 1921

Issued the 13 day of APRIL, in the year 1921

Clerk.

CHAS R. WHITEFORD

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.)

142 B6
19 21 Circuit Court
Docket No. _____

Olga May Parker

vs.
Joseph Parker

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file,

(Signature)

Solicitor for Plaintiff.

22275
No. _____
6

Filed 2 May 19 21

Robertson

Alma May Parker

Joseph Parker ^{vs.}

*In the Circuit Court
of Baltimore City*

TERM 19__

To the Honorable

Judge of Said Court:

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

[Signature]

Solicitor for Plaintiff,

Joseph

[Signature]

Solicitor for Defendant.

Circuit Court

142
19 21 B61 Docket No.....

Parker

vs.

Parker

Order of Reference
and Report

J. Probert
22275

No.....

8 ✓

Order Filed 3 day of May 1924

Report Filed..... day of..... 19

Oleha M. Parker

IN THE

142

Circuit Court

OF

BALTIMORE CITY

March Term, 1921

vs.

Joseph Parker

This case being submitted, without argument, it is ordered by the Court, this 3

day of May, 1921, that the same be and it is hereby referred to Alex H. Robertson, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

H. Arthur Plump

Report of Auditor and Master

Bill filed by wife against husband for divorce A Vinculo Matrimonii for adultery of defendant. Code Article 16, Section 36. Defendant summoned and answers. Proof shows marriage, residence and adultery of defendant. Case submitted and ready for decree.

Alex H. Robertson

Auditor and Master.

✓
CIRCUIT COURT

B 142
1921 No. Docket

.....Olelia M. Parker.....

VS.

.....Joseph Parker.....

Recorded

Folio / 22 1921

Decree of Divorce

B 22275
B No. 9

fd 6 May 1921

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

Alonzo D. ...
Auditor and Master.

Decree of Divorce

IN THE

Circuit Court

OF

BALTIMORE CITY

.....Olélie M. Parker.....

VS.

.....Joseph Parker.....

.....March.....Term, 1921.....

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

It is thereupon, this *Sixth* day of *May*, A. D. 1921.

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

Olélie M. Parker

the above named Complainant be and ^s he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, Joseph Parker.

And it is further Ordered, That the said defendant pay the cost of this proceeding.

Charles H. Miller