

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

B291
1927

CLEMENTINE PARKER

VS.

THOMAS PARKER,

1674 N. Guilford St.

BILL FOR DIVORCE.

B31923

Mr. Clerk:-

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

Filed 15 June 1927

CLEMENTINE PARKER

:

IN THE CIRCUIT COURT

VS.

:

OF

THOMAS PARKER

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully says:

1. That she was married to her husband, Thomas Parker, on the 7th day of October, 1917 and with whom she resided until the 12th day of February, 1927.
2. That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said Thomas Parker.
3. That the said Thomas Parker has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned women, whose names are unknown to your Oratrix 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 she discovered his said adulteries.
5. That there are no children born as result of said marriage.
6. That your Oratrix is destitute and without means of financing the expenses of this suit and that she is advised by Counsel that she is entitled to have an order passed by this Honorable Court awarding her some amount as alimony pendente lite and a certain sum to compensate her Solicitor. The defendant is employed and earns twenty-seven dollars and fifty cents per week.
7. That your Oratrix and the respondent are owners of 525 Robert St. this City, as tenants by the entireties. That by virtue of the above and other irreconcilable differences, the parties to this suit are unable to arrive to any reasonable

common understanding as to the use, enjoyment or disposition of the aforementioned joint property.

8. That both your Oratrix and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this Bill of Complaint.

TO THE END, THEREFORE, YOUR ORATRIX PRAYS:

(a) That she may be divorced A Vinculo Matrimonii from the said Thomas Parker.

(b) That a receiver or receivers may be appointed by this Honorable Court to take charge of all the joint property, 525 Robert St. in order to properly preserve same during the pendency of this suit.

(c) That a Trustee may be appointed with power and authority to sell same property and to divide the proceeds realized, after payment of legal charges and costs, between your Oratrix and the defendant.

(d) Alimony in such sum as the Court may decree during the pendency of this suit and a sum to compensate her Solicitor.

(e) 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 Thomas Parker, 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.

Davis & Evans

SOLICITORS FOR PLAINTIFF

P225

Ct. Ct.

B-291

1927

Docket No.

Clementine Parker

vs.

Thomas Parker

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B-31923

(2)

Filed

28 July

1927

Davis & Evans

SOLICITOR

14

Sampsoned and a copy of the Process left with the defendant John E. Potter Sheriff

(Kyzlosky) (6/22/27)

of gas \$0.95

JUN 16 1927 11 46 AM

RECEIVED THE SHERIFF'S OFFICE

EQUITY SUBPOENA

The State of Maryland

To Thomas Parker

1614 N. Gilmor St.

of Baltimore City, Greeting:

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

Clementine 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 JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the 9th day of May 1927 Issued the 15th day of June, in the year 1927.

Chas R. Whelpley 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.

P225

Ct. Ct.

B-291

1927

Docket No.

Clementine Parker

vs.

Thomas Parker

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B-31923

(2)

Filed

28 July

1927

Davis & Evans

SOLICITOR

14

Sampsoned and a copy of the process left with the defendant John E. Potter Sheriff

(Kyzlosky) 6/22/27

of gas \$0.95

JUN 16 1927 11 46 AM

RECEIVED THE SHERIFF

EQUITY SUBPOENA

The State of Maryland

To Thomas Parker
1614 N. Gilmor St.

of Baltimore City, Greeting:

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

Clementine 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 JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the 9th day of May 1927 Issued the 15th day of June, in the year 1927.

Chas R. Whelpley 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.

B Docket 291
1927

CIRCUIT COURT.

CLEMENTINE PARKER

vs.

THOMAS PARKER
1614 N. Gilmore St.

Order for Alimony

Pendente Lite

ORDER

B No. 31923
(3)

Fd:

16 June 1927
14

copy of this within Order of Court served on
Thomas Parker on the 22nd day of June - 1927
in presence of Joseph H. G. G. G. G. G.

John E. Potter
Jes \$10.75
Sheriffs

RECEIVED
THE SHERIFF

JUN 16 1927 11 46

IN THE
CIRCUIT COURT

OF
BALTIMORE CITY

May TERM, 1927

Clementine Parker

vs.

Thomas Parker

ORDERED BY THE COURT this 16th day of June 1927

that the defendant Thomas Parker

pay to the plaintiff Clementine Parker

the sum of Nine -----

Dollars per week, during the continuance of this suit, accounting from the 16th

day of June 1927 to the said plaintiff Clementine Parker

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

day of June 1927, provided a copy of this Order be served on the said defendant

Thomas Parker on or before the 23rd

day of June 1927

H. Arthur Plump

TRUE COPY—TEST:

CLERK

IN THE CIRCUIT COURT OF
BALTIMORE CITY

B 291/27
CLEMENTINE PARKER 291
1927

VS.

THOMAS PARKER

ANSWER TO NISI ORDER FOR
ALIMONY PENDENTE LITE

Mr. Clerk:

Please file & etc.

B 31923
(4)

J. Howard Payne
Solicitor for Respondent

J. HOWARD PAYNE
ATTORNEY AND COUNSELLOR AT LAW
BALTIMORE, MD.

220 ST. PAUL PLACE

Filed July 11 1927

CLEMENTINE PARKER

VS.

THOMAS PARKER

"

"

"

"

"

IN THE

CIRCUIT COURT OF

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of Thomas Parker to the Petition of filed
Clementine Parker dated June 16th., 1927, and filed in the a-
bove entitled cause respectfully shows:

That he ^{is} financially un-
able to comply with the Order of said Court to pay to the said
Clementine Parker the sum of nine dollars per week because his
salary or wages, which is his sole income is not twenty-seven
dollars and fifty cents per week.

That he has not been able
to accumulate any money and is at present without funds and is
therefore unable to pay any money at present.

That if he is obliged to
pay to the said Petitioner the amount set out in said Order he
will not have sufficient left to maintain and support himself.

He therefore prays that the prayer of said Petition be
refused.

AND as in duty bound, etc.

Solicitor for Respondent

Thomas Parker

Respondent

STATE OF MARYLAND, CITY OF BALTIMORE, to wit:

I HEREBY CERTIFY, that on this 24th. day of June, in the year one thousand nine hundred and twenty-seven, before me, the subscriber, a Notary Public of the State of Maryland, in and for Baltimore City, aforesaid, personally appeared THOMAS PARKER and he acknowledged the foregoing statement, this his answer to be true to the best of his knowledge and belief.

AS WITNESS my hand and Notarial Seal.

Linwood Frazier
.....
Notary Public.

Davis Evans

291

1927

Ct. Ct.

No.

Docket

B

Clementine Parker

vs.

Thomas Parker

MOTION FOR HEARING

B 31923.
15

No.

Filed 1 day of July 1927

J Howard Payne

Clementine Parker

vs.

Thomas Parker

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The *plaintiff* by *Davis T Evans*

her

Solicitor, applies to have the above entitled cause placed on the Trial Calendar

for hearing *on alimony*

in conformity with the First Equity Rule.

Davis T Evans

Solicitor for *plaintiff*

Serve on

J.H. Payne

220 St Paul St.

Served admitted this
5th day of July 1927.

J. ~~Howard~~ ~~Reynolds~~



Ct. Ct.

291

1927

No. B-67 Docket

Parker

vs.

Parker

NOTICE OF HEARING

B-No. 31923

(6)

No.

Filed 1 day of July 1927

18

Copy of the within notice served on J. H. Payne
Solicitor on the 5th day of July, 1927, in the
presence of George G. Boderick,
John E. Fotee
Jesse #0.75 Sheriff

Clementine Parker

vs.

Thomas Parker

IN THE

CIRCUIT COURT

OF BALTIMORE CITY

Upon application made by the Solicitor for the

Plaintiff

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

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

TESTIMONY taken at the office of George Arnold Frick Examiner on Tuesday January 31st, 1928, at one o'clock in the afternoon.

Present: George Evans, Counsel for Plaintiff.

J.Howard Payne, Counsel for Defendant.

Thereupon:

CLEMENTINE PARKER, the plaintiff, produced on her behalf, being first duly sworn, deposeth and saith as follows, that is to say-

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Clementine Parker, 1507 McCulloch Street, I work in a laundry now.

2 Q- You are the plaintiff in this proceeding?

A- Yes, sir.

3 Q- How long have you known your husband, the defendant?

A- I guess about eleven years.

BY MR.EVANS:

4 Q- Mrs.Parker when were you married?

A- I was married October 7th, 1917.

Clementine Parker.

5 Q- Where?

A- On Stricker Street in Baltimore City.

6 Q- By a minister of the Gospel?

A- Yes, sir.

7 Q- And you lived with your husband as husband and wife?

A- Yes, sir.

8 Q- Are you now living together?

A- No, we are not living together now.

9 Q- When did you separate?

A- February 12th.

10 Q- What year?

A- 1927.

11 Q- Who left who - did you leave him or did he leave you?

A- I left him.

12 Q- Where were you living then?

A- At 525 Roberts Street.

13 Q- Were you always a faithful, chaste and affectionate wife?

A- I were.

14 Q- Always kind to your husband?

A- I were.

15 Q- Prepared his meals and looked after his clothes and so forth as a wife should do?

A- I did.

Clementine Parker.

16 Q- Did you ever give your husband any cause to complain to you about not being faithful?

A- No.

17 Q- You state that you left your husband in February, 1927. Tell us under what conditions?

A- Well, I left him because he run after other woemn and he used to whip me - didn't treat me as a husband should.

18 Q- Was there anybody living in your house at the time you left your husband?

A- Yes, Thomas Johnson and Marie Thompson.

19 Q- They each occupied a room in the house?

A- Yes, sir.

20 Q- What room did you and your husband occupy?

A- My room was the third floor front and my husband occupied the same room.

21 Q- What room did Thomas Johnson occupy?

A- Second flòor front.

22 Q- You say your husband beat you?

A- Yes, sir.

23 Q- Did you have any fight or anything with your husband just before you left?

A- The night I left he started to fight and I ran out and I haven't been back since.

24 Q- Of course, you hadn't had any sexual relations with your husband at that time for over a week - that is

Clementine Parker.

from the time he cut you over the eye, you just lived there and tried to straighten things out. Is that right?

A- Yes, sir.

25 Q- What was this fight about on the week before you left?

A- Well, I went to the movies and when I come back he had been out and I asked him where he had been and he told me it was none of my business where he had been, so then him and I tried to talk it over and he told me he was going out and have a good time any-time he wanted to.

26 Q- You accused him of running with women?

A- I did.

27 Q- What did he say?

A- He said I didn't have anything to do with it.

28 Q- Say anything else?

A- We talked on and then he struck me and when I got up he cut me across the head.

29 Q- Did you tell him you wouldn't stand for his running around with women?

A- Yes, I did.

30 Q- Was that the first occasion you had to discuss his running around with women?

A- No.

31 Q- You talked it over before?

Clementine Parker.

A- Yes, sir.

32 Q- Why did you talk it over before?

A- It was about the same thing - because he was running around with women.

33 Q- Had you ever seen him on the street with anybody?

A- Yes, I did.

34 Q- About this girl that lived in the house where you lived - what was her name?

A- Marie Thompson.

35 Q- Did you have any discussion with him about running with her?

A- Yes, I told him a number of times about her.

36 Q- The night he cut you over the eye, that was the discussion you were having, wasn't it? You accused him or running with her?

A- Yes, sir.

37 Q- What did he say?

A- He would suit himself.

38 Q- Did you tell him anything about that girl moving?

A- I told him she would have to move but afterwards he told me she didn't have to move - that she could stay there as long as he paid the rent.

39 Q- Then there was nothing for you to do but go?

A- No, sir, and I went.

40 Q- That was one week before you actually left that you had this discussion as to this woman and so forth.

Clementine Parker.

After that did you live or cohabit with him as man and wife after the fight in which you accused him of running with this woman?

A- No, sir, I left there.

41 Q- And he admitted that he was running with her?

A- Yes, sir.

42 Q- You didn't have anything else to do with him?

A- No, I didn't.

43 Q- Have you lived or cohabited with him since February 12th, 1927?

A- No, I haven't.

44 Q- Were any children born as a result of the marriage?

A- No.

45 Q- Do you think there is any reasonable expectation of you and your husband living together again as man and wife?

A- No, never.

46 Q- Have you seen your husband since the separation?

A- Yes, I saw him with this girl he stays with now.

47 Q- Does he stay with some girl now?

A- Yes, sir, on Gilmor Street in the 1400 Block, on the right hand side. I don't know the number but I know where it is. I have been there. No one knew who I was and I went to the house and asked the woman there if Mrs. Parker was in and she said Mrs. Parker wasn't in

Clementine Parker

and neither was Mr.Parker.

48 Q- Did you tell her why you came?

A- No.

49 Q- Did you ask how many rooms they occupied there?

A- She said one room.

50 Q- That Mr.Parker was your husband?

A- Yes, sir.

51 Q- That woman living there as Mrs.Parker- do you know her?

A- No. I know she is a light complected lady.

52 Q- You have seen your husband on the street with her?

A- Yes, I have.

53 Q- Did you discuss it with your husband?

A- Not about her.

54 Q- Did you say anything about any other women to him, about him running around?

A- Yes.

55 Q- What did he say?

A- He told me he was running with them and he didn't intend to come back to me and it was none of my business.

56 Q- He said he could run with whom he pleased?

A- Yes, sir.

57 Q- Are you a citizen of the City of Baltimore, State of Maryland?

A- Yes, sir.

58 Q- Have you been for more than two years prior to

Clementine Parker.

the filing of this suit?

A- Yes, sir, I was born and raised in Maryland.

59 Q- Is your husband a resident of the City and State?

A- Of Maryland, yes.

60 Q- Mrs. Parker, did you discuss with your husband the question of this girl who lived in the same house where you lived, going away from there - that she had to move - the one that was running with him?

A- Yes, sir.

61 Q- What did he say about that?

A- He told me as long as he paid the rent why she could stay there.

62 Q- How about you?

A- He didn't say whether I could stay or go. It was left to my own satisfaction.

63 Q- But as far as he was concerned this girl could stay there?

A- Yes, sir.

No Cross Examination.

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.
Clementine Parker

THOMAS JOHNSON, a witness of lawful age, produced on behalf of the plaintiff, being first duly sworn, deposeseth and saith as follows, that is to say -

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Thomas Johnson, 546 Gold Street, stevedore.

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

A- Yes, sir.

3 Q- How long have you known them?

A- I have known them since around February, 1927, when I lived at 525 Roberts Street. I had a room there.

BY MR. EVANS:

4 Q- Were Mr. and Mrs. Parker living together as man and wife on Roberts Street?

A- Yes, sir.

5 Q- Were they always recognized in the community in which they lived as man and wife?

A- Yes, sir.

6 Q- What room did they occupy as a bedroom?

A- Third floor front.

7 Q- What room did you occupy?

A- Second floor front.

8 Q- That was right under their room?

A- Yes, sir.

Thomas Johnson.

9 Q- Have you ever heard any trouble between Mr. and Mrs.Parker there in the house?

A- Yes,, sir, I sure have.

10 Q- What kind of trouble?

A- Fussing like. They would start fighting and then I would hear her holler.

11 Q- Did you hear them fuss more than once or twice?

A- Sure, I heard them fuss plenty times.

12 Q- What was their usual discussion, if you heard it?

A- They would argue about him running with different women. He was going out with them and she would talk to him about it and I guess he would get mad and go on and hit her.

13 Q- When she accused him of it did you hear him deny it?

A- No.

14 Q- Was your room door open?

A- Sometimes it was open and sometimes it was closed.

15 Q- But you could hear the argument?

A- Yes, sir.

16 Q- Do you remember the incident of Mrs.Parker getting her face cut?

A- Yes, sir.

17 Q- Who cut her?

A- He cut her.

Thomas Johnson.

18 Q- Over what?

A- Over a quarrel.

19 Q- What did it start about?

A- She accused him of running around with some woman.

20 Q- Did he deny it?

A- No.

21 Q- What did he say, if anything, that you heard?

A- I don't remember, just what he said. It was so quick when I heard her holler out. This other girl was standing there in the hall.

22 Q- Is that the girl Parker's wife accused him of going out with?

A- Yes.

23 Q- Did you have any talk with that girl about Parker that night?

A- Yes. I told her right then that I was going to get another room. I said he was always beating his wife and the police would come in sometime and lock everybody up. I didn't stay there.

24 Q- Did she^{say}/why he was beating her?

A- No. She said, "It's a dirty shame - she could go away to herself."

25 Q- How long was that before Mrs. Parker left the Roberts Street address?

A- That was during the week I left. I left on Tuesday. I got up the next day after the fight and went

Thomas Johnson.

to get the Doctor for her. Doctor Frey on Presstman Street. Then I taken my clothes and moved out.

26 Q- Did Mrs.Parker leave there after that?

A- She only lived there about two days or so after I left,then she moved out.

27 Q- Now, did this girl that was living there over whom Mr. and Mrs.Parker was fighting that night and Mrs. Parker got her head cut - the argument you heard upstairs about a woman - did that girl room at that house after Mrs.Parker left?

A- She stayed there about a couple of weeks.

28 Q- Have you seen Parker since then?

A- Oh, yes.

29 Q- When did you see Parker since?

A- I seen him New Year's Night down on Calhoun Street in a little pool room down there.

30 Q- Do you know where he was living then?

A- He said he was living on Gilmor Street.

31 Q- Was anything else said about him living on Gilmor Street?

A- While we were talking and taking some drinks Jim, one of the boys, said he was living on Gilmor Street with some girl.

32 Q- What did he say about that?

A- He just laughed it off.

33 Q- About living on Gilmor Street with some girl?

Thomas Johnson.

A- Yes.

34 Q- Did you say anything to him about it?

A- No.

35 Q- How many times have you heard Mr. and Mrs. Parker quarrel about Parker running around with women?

A- I couldn't tell you how many times. Plenty times.

36 Q- How many times have you heard him admit or deny it?

A- Neither time.

37 Q- Do you mean he has never denied it?

A- No, he never denied it.

38 Q- What did he say?

A- Sometimes he would tell her he had to do this and he had to do that and it would lead into a fight.

39 Q- Did you ever hear him say he would do as he pleased?

A- Yes, sir.

40 Q- Is Mrs. Parker a resident of Baltimore City, State of Maryland?

A- Yes, sir.

41 Q- Has she been for more than two years prior to the filing of this suit?

A- Yes, sir.

42 Q- She has lived in Baltimore all her life hasn't she?

Thomas Johnson.

A- Yes, sir.

43 Q- And how about him?

A- Him too.

44 Q- Has Mrs.Parker lived or cohabited with him since she left in February, 1927?

A- No.

45 Q- Was Mrs.Parker always a faithful, chaste and affectionate wife?

A- Yes, sir.

46 Q- Did she always have Mr.Parker's meals ready?

A- Yes, sir.

47 Q- Always take care of his clothes and so forth?

A- Yes, sir.

48 Q- Did you ever hear him make any complaint to her about her not doing all that a wife should do?

A- No.

49 Q- Did you ever hear her complain to him about what a husband should do?

A- Yes, sir.

50 Q- Do you think there is any reasonable hope of them living together as man and wife again?

A- No.

No Cross Examination.

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:

W.
Thomas Johnson

Circuit Court

291
1927 B

No. 67 Docket

Clementine Parker

vs.

Thomas Parker

Final Order, Counsel Fee and Alimony
Pendente Lite.

No. 31923 B

(7)

Filed 11 July 1927

Clementine Parker
vs.
Thomas Parker

IN THE
Circuit Court
OF
BALTIMORE CITY.

July

Term, 19²⁷

This cause coming on to be heard upon the petition for Alimony **pendente lite** and Counsel fee, and the answer thereto, and testimony taken, and having been submitted by the solicitors for the respective parties;

Ordered by the Circuit Court of Baltimore City this Eleventh day
of July 19²⁷, that the Defendant, Thomas
Parker pay to the Plaintiff, Clementine
Parker the sum of _____ Dollars, as counsel fee
for the Solicitor of the _____ and that he
further pay the sum of Five (\$5⁰⁰) _____ Dollars per week,
to the said Clementine Parker
as Alimony **pendente lite** accounting from the Eleventh day of July 19²⁷
and continuing until the _____ day of _____ 19^{_____} (should this suit be
~~so long pending~~) or until the further order of this Court.

Payable through the Probation Department
of the Supreme Bench

Albert J. [Signature]

Circuit Court

29
1927 B Docket 67

Clementine Parker

vs.

Thomas Parker

Trick 4

Petition for leave to take
Testimony and Order of
Court thereon

B No. 31923

Filed 27 Aug 1927

Clementine Parker

vs.

Thomas Parker

IN THE
Circuit Court
OF
BALTIMORE CITY

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

THE PETITION OF

Clementine 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.

Davist Evans
Solicitor for Plaintiff

ORDERED, this *27th* day of *August* 192*7*, 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.

Lucius D. Dunne

Placed on
Davis and Evans
Cpls.

3d 28, 1927
Same admitted
Davis & Evans

OCT 25 1927 3 50 PM
RECEIVED AT
THE SHERIFF'S OFFICE ON

291-1927

Circuit Court.

B291
1907

Docket No.

CLEMENTINE PARKER

vs.

THOMAS PARKER

Petition and Order to Close Testimony.

(1)
B 31923
No. (19)

Filed 25 day of Oct 1927

18

Copy of the within Petition and Order of Court
served on Davis and Evans, ^{SOLICITORS,} on the 25th day
of October 1927 in the presence of George G. Braden
John G. Pate
Sheriff
New 10.75.

CLEMENTINE PARKER

vs.

THOMAS PARKER

IN THE
Circuit Court

OF

BALTIMORE CITY.

September

Term, 1927

To The Honorable,

The Judge of the said Court:

The Petition of **Thomas Parker**

in the above entitled cause, respectfully represents that on the **27th** day of **August**, 19**27**, the **plaintiff** obtained leave of Court to take testimony before one of the Standing Examiners of this Court.

That though a sufficient time has elapsed the **plaintiff** has not **taken** testimony, wherefore your petitioner prays that a Rule may be laid upon the **plaintiff** to close the taking of h^{ER} testimony, within such reasonable time after notice of such Rule as may be deemed proper.

J. Howard Payne
Solicitor for defendant



ORDERED BY THE COURT, this **25** day of **October** 19**27** that the **plaintiff** close the taking of h^{ER} testimony in the above entitled cause on or before the **9th** day of **November** 19**27**, provided a copy of the foregoing petition and this order be served on the **plaintiff** or her Solicitor, and on the Examiner on or before the **2nd** day of **November** 19**27**

TRUE COPY, TEST:

Clerk.

H. Arthur Stamp

291
IN THE CIRCUIT COURT
OF

BALTIMORE CITY

B 291/1927

CLEMENTINE PARKER

VS.

THOMAS PARKER

PETITION & ORDER THEREON.

B 31923,

Mr. Clerk:- *(10)*

Please file.

Davis & Evans
ATTORNEYS FOR PETITIONER

DAVIS & EVANS
ATTORNEYS AT LAW

4d 9 Nov 1927

CLEMENTINE PARKER

:

IN THE CIRCUIT COURT

VS.

:

OF

THOMAS PARKER

: :

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your petitioner respectfully says:

(1) That on or about the 26th day of October, 1927 the solicitors for your petitioner were served with an order to close testimony on or before the 9th day of November, 1927.

(2) That your petitioner is absent from the City with her employe and will be until about the 20th day of December, 1927.

WHEREFORE YOUR PETITIONER PRAYS:

That the time to close testimony be extended to the 22nd day of December, 1927.



ATTORNEYS FOR PETITIONER

Ordered by the Court this 9th day of November, 1927
that the time to close testimony be and the same is hereby ex-
tended to the 22nd day of December, 1927. and
that payment of alimony pendente
lite in the intervening time be suspended.

H. Arthur Stamp

291-1427
IN THE
CIRCUIT COURT OF BAL-
TIMORE CITY

B 291
1927
CLEMENTINE PARKER

VS

THOMAS PARKER

ORDER and PETITION

Mr. Clerk:

Please File.

B 31923
(117427)

J. Howard Payne
Solicitor for Defendant
J. HOWARD PAYNE
ATTORNEY AND COUNSELLOR AT LAW
BALTIMORE, MD.

220 ST. PAUL PLACE

Feb 13th Feb 1928

3/13/3/45

CLEMENTINE PARKER

vs

THOMAS PARKER

:
:
:
:
:
:

IN THE
CIRCUIT COURT OF
BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Defendant in this case respectfully shows unto your Honor:

FIRST: That the Petition of Clementine Parker dated June 14, 1927 was filed in this Court asking for a divorce A Vinculo Matrimonii.

SECOND: That the answer of Thomas Parker to the said Petition of Clementine ^{Parker} was filed *1st day July 1928*: that this answer was only to the part of the bill that had to do with alimony Pendente Lite.

Therefore, the Defendant through J. Howard Payne, his Attorney, respectfully asks leave of the Court to supplement answer, heretofore made in so far as may be necessary to properly protect his interest in the premises.

J. Howard Payne
Solicitor for Defendant

Upon the foregoing Petition an application to supplement answer it is thi *15* day of February, 1928, ordered that the Petitioner have and he is hereby granted leave to make further answer in the above titled matter.

Howard Payne

CLEMENTINE PARKER

vs

THOMAS PARKER

&
&
&
&
&

-----&-----

IN THE
CIRCUIT COURT OF
BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of Thomas Parker to the Petition of Clementine Parker dated June 16th, 1927, and filed in the above titled cause respectfully shows;

FIRST: That he admits the allegations contained in paragraph one.

SECOND: That he neither admits nor denies the allegations contained in paragraphs two, three and four, but asks for strict proof thereof.

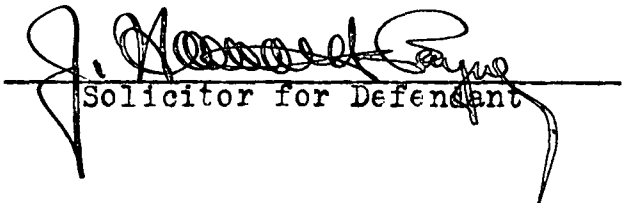
THIRD: That he admits the allegations contained in paragraph five.

FOURTH: That he denies the allegations contained in paragraph seven.

FIFTH: That he admits the allegations contained in paragraph eight.

Having answered all and material, the allegations contained in this ~~and all the material in~~ the Petitioner's Bill of Complaint, he therefore prays that the same be dismissed with his costs.

AND, as in duty bound, etc.


Solicitor for Defendant