

IN THE CIRCUIT COURT OF

BALTIMORE CITY

*B 512  
1927*

NATHANIEL QUILL

VS,

SUMINA B. QUILL

*710 Lafayette St*

*B 31459*

BILL FOR DIVORCE.

Mr. Clerk:-

Please file.

*Davis & Evans*

Attorneys for Plaintiff

DAVIS & EVANS  
ATTORNEYS AT LAW

*Filed 2 Feb 1927*

NATHANIEL QUILL : IN THE CIRCUIT COURT

VS. : OF

SUMINA B,QUILL : BALTIMORE CITY

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

1. That he was married to his wife, Sumina B. Quill on the 8th day of August, 1907 and with whom he resided until the 6th day of April, 1919 when the defendant deserted the plaintiff.
2. That though the conduct of your Orator toward the said Sumina B. Quill has always been kind, affectionate and above reproach, she has, without any just cause or reason, abandoned and deserted him and has declared her intentions to live with him no longer, and that such abandonment has continued uninterruptedly for more than three years and is deliberate and final and the separation of the parties is beyond any reasonable expectation of reconciliation.
3. That your Orator has not lived or co-habited with the said defendant since said desertion.
4. That there are no children born as result of said marriage.
5. That both your Orator 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:

- (a) That your Orator may be divorced A Vinculo Matrimonii from the said Sumina B. Quill.
- (b) That he may have such other and further relief as his case may require.

May it please your Honor to grant unto your Orator the Writ of Subpoena directed against the said Sumina B. Quill, commanding and requiring her 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.

  
\_\_\_\_\_  
ATTORNEYS FOR PLAINTIFF.

P13

Ct. Ct.

B-52

1927

Docket No.

Nathaniel Quill

vs.

Sumina B. Quill

710 Lafayette

SUBPOENA TO ANSWER BILL OF COMPLAINT

PW

No.

B-31459

(2)

Filed

14 Feb

1927

Davis & Evans

SOLICITOR

14

Summoned and a copy of the process left with the defendant (K. Woodbury) 2/12/27  
John C. Pate Sheriff  
Fee \$0.80

3/13/27

FEB 2 1927 3 18 PM

RECEIVED AT THE SHERIFFS OFFICE

EQUITY SUBPOENA

The State of Maryland

On Sumina B. Quill

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

Nathaniel Quill

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 10th day of January 1927 Issued the 2nd day of February, in the year 1927.

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.



52  
IN THE CIRCUIT COURT

OF

B 52  
BALTIMORE CITY. 1927

NATHANIEL QUILL,  
Complainant,

vs.

SUMINA QUILL,  
Respondent.

ANSWER TO BILL OF COMPLAINT.

Mr. Clerk: Please file.

B 31459

{3}

*Charles W. Main*  
Solicitor for Respondent.

CHARLES W. MAIN  
Attorney at Law  
2 E. Lexington St.  
Baltimore, Md.

FILED

24<sup>th</sup> Feb. 1927

NATHANIEL QUILL, : IN THE  
Complainant, :  
vs. : CIRCUIT COURT  
SUMINA QUILL, : OF  
Respondent. : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of Sumina Quill, Respondent, to the Bill of Complaint heretofore filed against her in this Honorable Court exhibited, this Respondent answering says:

FIRST: That she admits that she was married to the Complainant on the 8th day of August, 1907, as set forth in the first paragraph of said Bill of Complaint.

SECOND: Answering the second paragraph of said Bill of Complaint, this Respondent says that she denies most emphatically all and singular the material allegations alleged therein.

THIRD: Answering the third paragraph of said Bill of Complaint, this Respondent says that she denies most emphatically that she deserted the Complainant, the said Nathaniel Quill. And further answering said paragraph three, this Respondent says that on or about the 21st day of September, 1922, she filed a Bill of Complaint in the Circuit Court No. 2 of Baltimore City, praying for alimony pendente lite and permanent, for the reason that this Respondent is in bad health, and unable to work and support and maintain herself; that the Complainant in this Bill, the said Nathaniel Quill, evaded service of the Sheriff for a period of more than sixty days, and was finally summoned some time during the latter part of November or the early part of December, 1922, and that he was then placed under an order to pay Six (\$6.00) Dollars per week as alimony pendente lite; that the Complainant in this Bill, the said Nathaniel Quill, is now and has been almost continuously in contempt of Court under said order; that there are now more than One Hundred (\$100.00) Dollars due this Respondent

under said order, and, as the Sheriff was unable to get service on the said Nathaniel Quill, this Respondent was obliged to go to the Northwestern Police Station and swear out a warrant for his arrest, and he was indicted by the Grand Jury of Baltimore City and tried in the Criminal Court Part II on the 17th day of February, 1927, and paroled to pay Four Dollars (\$4.00) per week through the Prisoners Aid Society for the support and maintenance of this Respondent, Sumina Quill.

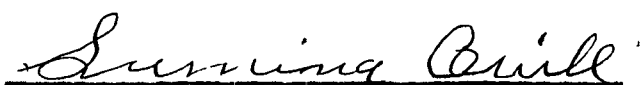
FOURTH: Answering the fourth and fifth paragraphs of said Bill of Complaint, this Respondent admits that no children were born as the result of her marriage with the said Nathaniel Quill, and also that both the Complainant and the Respondent are citizens of the State of Maryland and have resided in Baltimore City for more than three years last past.

FIFTH: That the Complainant, the said Nathaniel Quill, is employed by the Baltimore & Ohio Railroad, and receives a salary of between three and four dollars per day.

SIXTH: That this Respondent is advised, and therefore avers, that she is entitled to have an order passed by this Honorable Court directing the Complainant, Nathaniel Quill, to pay her counsel a reasonable fee for his services.

And having answered said Bill of Complaint and each paragraph thereof, in so far as she is advised it is material so to do, this Respondent prays to be hence dismissed.

  
Solicitor for Respondent.

  
Respondent.



Assess on  
Nathaniel Quill  
1303. Division St

B 52  
1927  
B Docket

CIRCUIT COURT No. 2

Nathaniel Quill

vs.

Sumina Quill

Order Counsel Fee and Alimony  
Pendente Lite  
Husband Plaintiff

ORDER

No. 31459 B.  
(4) (7)  
8

" 23 Sept 1927  
24 Feb.  
Filed Chas W. Main Coe 1927  
FD 2 April 1927

Non Est John E. Potee Sheriff  
Non Est John E. Potee Sheriff

(2nd Return)

(2nd Return)

Copy of the within Order of Court served  
on Nathaniel Quill on the 26th day  
of September 1927 in presence of August J. Riebig

Deco No. 75

John E. Potee  
Sheriff

RECEIVED  
THE SHERIFF

FEB 24 1927

Nathaniel Quill

IN THE

CIRCUIT COURT No. 2

vs.

OF

Sumina Quill

BALTIMORE CITY

January , TERM, 192 7.

ORDERED BY THE COURT, this 24" day of February 192 7

that the Plaintiff Nathaniel Quill

pay to the Defendant Sumina Quill

the sum of Twenty five Dollars as Counsel Fee for the

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

~~Dollars per week, during the continuance of this suit, to the said Defendant.~~

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 11" day of March 1927, provided a copy of this Order be served on the said Plaintiff

Nathaniel Quill on or before the 4"

day of ~~March~~ <sup>February</sup> 192 7.

James P. Gorter

TRUE COPY—TEST:

Clerk.

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this *2* day of *April* 192*7*, that the time for showing cause under said Order be extended to the *18* day of ~~May~~ *April* 192*7*, and the time for service of a copy of the same be extended to the *9* day of *April* 192*7*.

*H. Arthur Stump*

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this 23 day of September 1927, that the time for showing cause under said Order be extended to the 8 day of October 1927, and the time for service of a copy of the same be extended to the 30 day of September 1927.

H. Arthur Stump

*Served on*  
*Davis & Evans*

*215 St Paul St*

*Served admitted 2 apr*

*5 1927*

*Davis & Evans*

**CIRCUIT COURT**

*57*  
*1927*

Docket No. *B. 67*

*Nathaniel Quill*  
VS.

*Sumina Quill*

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

No. *B 31459*  
*67*

Fd. *2 April* 1927  
*16*

*Copy of the within Petition and Order of Court served on Davis and Evans, Solicitors on the 5th day of April, 1927, in the presence of Robert M. Wyatt.*

*John E. Patee*  
*Sherriff*

*Dec \$0.50*

APR 4 1927 2 29 PM

RECEIVED AT  
THE SHERIFFS OFFICE OF

*Chas W Main*



Nathaniel Guill  
VS.  
Ismina Guill

IN THE  
Circuit Court  
OF  
BALTIMORE CITY

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

*Defendant*  
The ~~plaintiff~~ *the* in this case respectfully shows unto your Honor:

THAT ~~he~~ *she* desires to examine orally, in open Court and in the presence of your Honor, certain *answers to the* 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.

*Charles N. Mann*

Solicitor for ~~Plaintiff~~ *Defendant*

Upon the foregoing Petition and Application it is this *2nd* day of *April* A. D., 19*27*, 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 *Plaintiff* or his Solicitor, on or before the *12th* day of *April* 19*27*

*H. Arthur Stamp*

**CIRCUIT COURT**

352  
197

Docket No.

Nathaniel Quill

vs.

Summa Quill

Order

19

Morfit

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

B No. 31459

< 5 >

Fd 18<sup>th</sup> March 1927

*Mathaniel Quill*

*vs.*

*Summa Quill*

IN THE  
Circuit Court  
OF  
BALTIMORE CITY

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

THE PETITION OF *plaintiff*

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

*Stevenson + Evans*  
Solicitor for *plaintiff*

ORDERED, this *18* day of *March* 19*27* 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.

*James P. Gorter*