

IN THE CIRCUIT COURT.

⁸⁸
BALTIMORE CITY

B 162
1927

ETTA RICHARDSON

VS.

THOMAS RICHARDSON

1430 E. Monument St

BILL FOR DIVORCE.

B 31677

Mr. Clerk:

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

Ad 31 Mch 1927

ETTA RICHARDSON

:

IN THE CIRCUIT COURT ~~1409~~

VS.

:

OF

THOMAS RICHARDSON

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully says:

1. That she was married to her husband, Thomas Richardson on or about the 17th day of January, 1923 and with whom she resided until about the 5th day of January 1927 when the defendant deserted her.
2. That your Oratrix has always conducted herself as a faithful, chaste and affectionate wife toward the said Thomas Richardson.
3. That the defendant on or about the 5th day of January, 1927 drove your Oratrix from the home 1430 E. Monument St., and refused to give her shelter or support, without cause or provocation.
4. That prior to the happening on the 5th day of January, 1927 your Oratrix says that the defendant stopped all of her credit, refused to give her money for her support and did on divers times beat her and do her bodily harm.
5. Your Oratrix is sick, destitute and without means to support herself but the defendant is employed and earns about fifty dollars per week. She is advised by Counsel that she may petition this Honorable Court that she may be granted alimony pendente lite, permanent alimony and a reasonable sum to compensate her Solicitors.

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

TO THE END, THEREFORE, YOUR ORATRIX PRAYS:

- (a) That she may be divorced a mensa et thoro from the said Thomas Richardson.
- (b) Alimony pendente lite.
- (c) Permanent alimony.
- (d) Counsel fee.
- (e) Such other and further relief as her case may require.

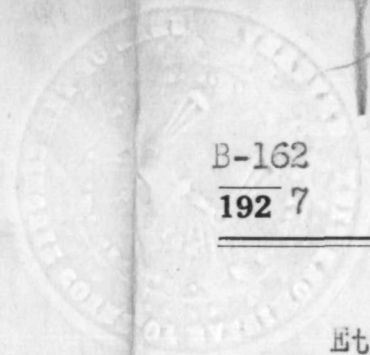
May it please your Honor to grant unto your Oratrix the Writ of Subpoena directed against the said Thomas Richardson, commanding and requiring him to be and appear in this Court on some day certain to be named therein to answer the premises and abide by and perform such decree or order as may be passed therein.

AND as in duty bound, etc.

Davis & Evans
SOLICITORS FOR PLAINTIFF.

RECEIVED AT
THE SHERIFFS OFFICE

APR 1 1927 1 37 PM



P105

Ct. Ct.

B-162
192 7

Docket No.

Etta Richardson

vs.

Thomas Richardson

1430 E. Monument St

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Pro

B-31677

(2)

Filed

7 April

1927

Davis & Evans

SOLICITOR

B-3

*Summoned and a copy of the process
left with the defendant.*

*John E. Fotee
Sheriff*

*(Bachmann)
4/4/27*

New P.O. 8

EQUITY SUBPOENA

The State of Maryland

To Thomas Richardson

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

Etta Richardson

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 14th day of March 1927. Issued the 31st day of March, in the year 1927.

Handwritten signature of Clerk and the word 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)

B Docket 162
1927

CIRCUIT COURT.

ETTA RICHARDSON

vs.

THOMAS RICHARDSON

4/4/27

Order for Alimony

Pendente Lite

ORDER

B No. 31677
(3)

Fd:

1st April 1927

B-3

Copy of the within Order of Court served on Thomas Richardson on the 4th day of April 1927 in the presence of Albert J. Bachmann

Deco \$0.50

John E. Ptee
Sheriff

IN THE
CIRCUIT COURT

OF
BALTIMORE CITY

March TERM, 1927

ETTA RICHARDSON

vs.

THOMAS RICHARDSON

ORDERED BY THE COURT this ^{10th} day of ~~March~~ ^{April} 1927

that the defendant Thomas Richardson

pay to the plaintiff Etta Richardson

the sum of Sixteen

Dollars per week, during the continuance of this suit, accounting from the ^{10th}

day of April 1927 to the said plaintiff Etta Richardson

as alimony, *pendente lite* unless cause to the contrary be shown on or before the ^{16th}

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

Thomas Richardson on or before the ^{9th}

day of April 1927

H. Arthur Stump

TRUE COPY—TEST:

CLERK

67B-112

IN THE CIRCUIT COURT
OF
BALTIMORE CITY

B 162
1927

ETTA RICHARDSON

VS

THOMAS RICHARDSON

B 31677

(4)

ANSWER

Mr. Clerk:

Please file.

James L. Daugh
Attorney for Defendant.

JAMES L. DAUGH
ATTORNEY AT LAW
103 E. PLEASANT ST.
BALTO., MD.

FILED

14 April 1927

ETTA RICHARDSON
VS
THOMAS RICHARDSON

IN THE
CIRCUIT COURT
OF BALTIMORE CITY

TO THE HONORABLE

THE JUDGE OF SAID COURT

The answer of Thomas Richardson to the Bill of Complaint of Etta Richardson respectfully represents unto Your Honor:

FIRST: That he admits the allegations contained in paragraph ONE, referring to their marriage on January 17, 1923, but denies that he deserted her on January 25, 1927.

SECOND: That he denies the allegations contained in paragraphs TWO, THREE, FOUR and FIVE and demands strict proof thereof.

And having fully answered said Bill of Complaint, he prays that the same may be dismissed with his costs.

AND AS IN DUTY BOUND ETC.

Thomas Richardson
Defendant

James A. Blough
Solicitor for Defendant

STATE OF MARYLAND

CITY OF BALTIMORE

TO WIT:

I HEREBY CERTIFY that on this 14th day of April, 1927, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared Thomas Richardson and made oath in due form of law that the matters and facts contained in the foregoing answer are true to the best of his knowledge and belief.

WITNESS my hand and Notarial Seal.

Charles H. Doran
Notary Public.

Davis and Lewis

162 Ct. Ct.
1927 No. 867 Docket

Etta Richardson

vs.

Thomas Richardson

MOTION FOR HEARING

1331677
[57]

No.

Filed 16 day of April 1927

Geo F. Chaugh

Etta Richardson

vs.

Thomas Richardson

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The *Plaintiff*

by *Davis Evans*

her

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

for hearing *on alimony pendente lite*

in conformity with the First Equity Rule.

Solicitor for *Davis Evans*

Serve on

J.L.Ebaugh

James L. Ebaugh
4/19/27

109
E Present

REC'D
THE SHERIFF
APR 19 1927 11

CIRCUIT COURT

Ct. Ct.

162
1927 No. B-67 Docket

Richardson
vs.
Richardson

NOTICE OF HEARING

(1)

B- No. 31677
(6)

No.
Filed 16 day of April 1927

H

*Copy of the within Notice served on J.L. Ebaugh
Solator on the 19th day of April 1927, in the
presence of Louis Hubl.
John E. Peter
Steff
Dues \$0.50*

Etta Richardson

vs.

Thomas Richardson

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 pendente lite

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

67 B-162

IN THE CIRCUIT COURT
OF
B 162
1927 BALTIMORE CITY

THOMAS RICHARDSON
Plaintiff

VS

ETTA RICHARDSON
Defendant

Bond of Monument Sto.

CROSS BILL OF COMPLAINT

B 31677

MR. CLERK:

(7)

Please file,

James H. Baugh
Sol. for Plaintiff

FILED *22 April 1927*

THOMAS RICHARDSON
Plaintiff

VS

ETTA RICHARDSON
Defendant

*
*
*
*
*

IN THE
CIRCUIT COURT
OF BALTIMORE CITY

CROSS BILL OF COMPLAINT.

TO THE HONORABLE

THE JUDGE OF SAID COURT

Cross

The Bill of Complaint of THOMAS RICHARDSON, Plaintiff, respectfully represents unto Your Honor:

ONE

That on or about the 17th day of January, 1923, he was married to the Defendant, ETTA RICHARDSON, in the City of Baltimore, State of Maryland.

TWO

That there were no children born as a result of said marriage.

THREE

That Your Orator has been a resident of the City of Baltimore, State of Maryland for more than two years prior to the filing of this Bill of Complaint.

FOUR

That Your Orator has always behaved himself as a faithful, chaste, and affectionate husband to the said Etta Richardson.

FIVE

That the said Etta Richardson, Defendant, has been guilty of the crime of adultery with divers men in the City of Baltimore and elsewhere, the names of whom are unknown to your Orator; that since the discovery of said adulteries, Your Orator has not lived nor cohabited with the said Defendant nor has he in any way condoned any of the offenses herein alleged.

THEREFORE YOUR ORATOR PRAYS

(a) That he be divorced a vinculo matrimonii from the said Defendant, Etta Richardson, his wife.

(b) That Your Orator 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 to the said Etta Richardson, Defendant, who is a resident of the City of Baltimore, commanding her to be and appear in this Honorable Court in person or by solicitors on some certain day to be named to show cause, if any she may have, why decree should not be passed as prayed.

And as in duty bound etc.,

Thomas Richardson
PLAINTIFF

James P. Blough
Solicitor for Plaintiff

STATE OF MARYLAND

CITY OF BALTIMORE

TO WIT:

I hereby certify, that on this 20th day of April, 1927, before me, the subscriber, a Notary Public, of the State of Maryland, in and for the City of Baltimore, aforesaid, personally appeared Thomas Richardson, the Plaintiff, and made oath in due form of law that the matters and facts contained in the above Bill of Complaint are true to the best of his knowledge, belief and information.

WITNESS my hand and Notarial Seal.

Charles H. Long
Notary Public.

Circuit Court

162
1927 B

No. 67 Docket

Etta Richardson

VS.

Thomas Richardson

Final Order, Counsel Fee and Alimony
Pendente Lite.

No. 31677 B
1927

Filed 25 April 1927

Etta Richardson

vs.

Thomas Richardson

IN THE
Circuit Court
OF
BALTIMORE CITY.

March 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 25th day of April 1927, that the defendant, Thomas Richardson pay to the plaintiff, Etta Richardson the sum of _____ Dollars, as counsel fee for the Solicitor of the _____ and that he further pay the sum of Twelve (\$12⁰⁰/₁₀₀) Dollars per week, to the said Etta Richardson as Alimony **pendente lite** accounting from the 25th day of April 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 prisoners aid association

W. Arthur Stump

P 156

Ct. Ct.

B-162
1927 Docket No.

Thomas Richardson

vs.

Etta Richardson

Bond and promissory note
SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B-31677
(8) (10)

Filed 9 May, 1927
11 24 May 1927
James L. Ebaugh
SOLICITOR

13

hon Est
Buck

John E. Potter
Sherry

5/9 1927

REISSUED TO June Return Day, 1927

Chas R Whiteford
Client
Summoned and a copy of the Process left
with the Defendant

John E. Potter
Sherry

Buck
5/23/27

Rec \$0.80

RECEIVED
THE SHERIFF

APR 24 1927 4 5

EQUITY SUBPOENA

The State of Maryland

To Etta Richardson

Bond & Monumnet Sts.

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

Thomas Richardson

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 14th day of March 1927 Issued the 22nd day of April, in the year 1927

Chas. R. Whitford 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.

162-1927

IN THE CIRCUIT COURT OF

BALTIMORE CITY

*B 162
1927*

ETNA RICHARDSON

VS.

THOMAS RICHARDSON
(IN CROSS BILL)

THOMAS RICHARDSON

VS.

ETNA RICHARDSON

RESPONDENT'S ANSWER.

B 31677

Mr. Clerk:-

Please file.

Davis & Evans

ATTORNEYS FOR RESPONDENT IN
CROSS BILL.

DAVIS & EVANS
ATTORNEYS AT LAW

Ad 15 June 1927

ETTA RICHARDSON : IN THE CIRCUIT COURT

VS. : OF

THOMAS RICHARDSON : BALTIMORE CITY
(IN CROSS BILL)

THOMAS RICHARDSON : IN THE CIRCUIT COURT

VS. : OF

ETTA RICHARDSON : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the Cross Bill of Complaint, respectfully says:

1. That she admits the allegations contained in the first paragraph of the Cross Bill.
2. That she admits the allegations contained in the second paragraph of the Cross Bill.
3. That she admits the allegations contained in the third paragraph of the Cross Bill.
4. That she denies the allegations contained in the fourth paragraph of the Cross Bill.
5. That she denies the allegations contained in the fifth paragraph of the Cross Bill.

WHEREFORE your respondent prays that the Cross Bill be dismissed with cost.

Davis Evans

ATTORNEYS FOR RESPONDENT IN
CROSS BILL.

Leaves P. O.
between 3rd and 3³⁰ P.M

162-1927

B 162
1927. Cir. Ct. No.....

Etta Richardson
vs.

Thomas Richardson

Attachment in Equity.

B No. 31677

Filed 10 day of Nov 1927

3

"Attached" "Crashed on Coats" Judge - Lump.
11/6/1927 - John E. Jotcey
Sheriff
Coats - \$1.00
Coats - \$2.00
Sheriff - \$3.00
Paid
6261/91/11
1927

NOV 10 1927 1 13 PM

RECEIVED AT
THE SHERIFF'S OFFICE CIV

(ATTACHMENT IN EQUITY)

MARYLAND, Sc.

The State of Maryland.

To the Sheriff of Baltimore City, Greeting:

You are Hereby Commanded, that you attach the body of *Thomas Richardson, Baltimore Post Office, Wagon No. 7.*

if he shall be found in your bailiwick, and *him* sake keep, so that you have *him* before the Judge of the Circuit Court, of Baltimore City, at the Court house in the same city, on the _____ day of _____ 19____, to answer as well touching a certain contempt by *him* committed in not

complying with the order of Circuit Court, passed April 25, 1927 to the effect that he pay \$12.00 per week for the support of his family, payments to account from the 25th of April, 1927.

as well as to such other matters and things as shall be then and there alleged against *him*,

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 *12* day of *September* 19*27*

Issued the *10* day of *November* 19*27*

Chas R Whiteford Clerk.

Let attachment issue

H. Arthur Stump

Circuit Court

162
1927 B No. 67 Docket

Thomas Richardson

in Cross Bill

vs.

Etta Richardson

Final Order, Counsel Fee and Alimony
Pendente Lite.

No. 31677 B
(13)

Filed 19 Nov 1927

Thomas Richardson
vs.

Etta Richardson

IN THE
Circuit Court
OF
BALTIMORE CITY.

Term, 19

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 15th day of November 1927, that the Plaintiff, Thomas Richardson pay to the Defendant, Etta Richardson the sum of _____ Dollars, as counsel fee

for the Solicitor of the _____ and that he further pay the sum of Ten (\$10.00) Dollars per week to the said Etta Richardson

as Alimony pendente lite accounting from the 15th day of November 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

Prisoners Aid Association And it is hereby further ordered that the order in the above entitled cause passed on 25th day of April, 1927 by this Honorable Court be ~~by~~ is hereby rescinded ~~and revoked by all payments thereunder extinguished.~~

H. Arthur Trump

Rev on
Ebaugh

RECEIVED AT
THE SHERIFF'S OFFICE ON

DEC 24 1927 11 35 AM

Service admitted
James L. Ebaugh
12/24/27

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

67 B

ETTA RICHARDSON

VS.

THOMAS RICHARDSON

B 31677
(13)

PETITION & ORDER THEREON

— 11 —

Mr. Clerk:

Please file.

George W. Lawrence
ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

9d 24 Dec 1927

BAUMGARTEN & CO., INC.

Copy of the within Petition and Order of Court
served on James L. Ebaugh Solicitor on the
27th day of December 1927 in presence of
Adam S. Buck

Fees \$0.75

John E. Peter
Sheriff

ETTA RICHARDSON : IN THE CIRCUIT COURT
VS. : OF
THOMAS RICHARDSON : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The petition of Etta Richardson, respectfully says:

1. That on or about the 31st day of March, 1927 she filed in this Honorable Court a bill praying among other things, a divorce A Mensa et Thoro.
2. That an answer and Cross Bill was filed thereto and the Cross Bill properly answered as will appear from the papers.
3. That your Oratrix desires to amend her original Bill by supplementing the following:
 - (1) That she was married to her husband, Thomas Richardson on or about the 17th day of January, 1923 and with whom she resided until about the 5th day of January, 1927 when the defendant deserted her.
 - (2) That your Oratrix has always conducted herself as a faithful, chaste and affectionate wife toward the said Thomas Richardson.
 - (3) That the defendant, on or about the 5th day of January 1927 drove your Oratrix from the home 1430 E. Monument Street and refused to give her shelter or support, without cause or provocation.
 - (4) That prior to the happening on the 5th day of January 1927, your Oratrix says that the defendant stopped all of her credit, refused to give her money for her support and did on divers times beat her and do her bodily harm.

(5) That the defendant on the 26th day of November, 1927 committed the crime of adultery with a lewd and abandoned woman whose name to your Oratrix is unknown, at "The Wilson House," 609 N. Paca Street, Baltimore, Maryland.

(6) That the defendant has on divers other times and places committed the crime of adultery with lewd and abandoned women, whose names to your Oratrix are unknown.

(7) Your Oratrix is sick, destitute and without means to support herself but the defendant is employed and earns about fifty dollars per week. She is advised by Counsel that she may petition this Honorable Court that she may be granted alimony pendente lite, permanent alimony and a reasonable sum to compensate her Solicitors.

(8) That your Oratrix and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than their 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 Richardson.
- (b) Alimony pendente lite.
- (c) Permanent alimony.
- (d) Counsel fee.
- (e) Such other and further relief as her case may require.


ATTORNEY FOR PLAINTIFF

Upon the foregoing petition, it is ordered by the
Circuit Court of Baltimore City this 24th day of December, 1927
that leave be granted to file the supplementary bill provided
a copy be served on the defendant or his Counsel of record on
or before the 31st day of December, 1927.

H. Arthur Stump

661
67/1927 B
B 661
1927

IN THE
CIRCUIT COURT OF
BALTIMORE CITY

-----*****

~~Thomas~~ ETTA RICHARDSON
VS.
THOMAS RICHARDSON
and
THOMAS RICHARDSON

Jack

VS

ETTA RICHARDSON

Petition and Order to
Rescind and Order to take
Testimony before one of
the Standing EXAMINERS.

Mr. Clerk:
Please file etc.

U. Grant Tyler
Thomas
Solicitor for Richardson

B 31677
(18)

Ad 13 March 1928

ETTA RICHARDSON

VS

THOMAS RICHARDSON
and

THOMAS RICHARDSON

VS.

ETTA RICHARDSON

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IN THE

CIRCUIT COURT OF

BALTIMORE CITY

To the Honorable, the Judge of the aforesaid Court:

The petition of the Plaintiff in the Cross-Bill and defendant in the Original-Bill, respectively, represents unto this Honorable Court;

I.

That for more than eighteen months this cause has been pending into this Honorable Court and the plaintiff in the Cross-Bill and defendant in the Original was desirous of proceeding but was informed that he could not until the plaintiff in the Original-Bill has started which he believed because of his knowledge of court procedure.

2.


That at last he changed Solicitors, who attempted to reach the Solicitors for the plaintiff for at least a week without success in order to reach and agreement concerning the taking of testimony, rather the mode either by EXAMINER or in open Court, which efforts was futile, because of the futile efforts he had an order passed permitting and allowing testimony to be taken in open court.

3.

That after his futile efforts to reach the Solicitors for the plaintiff in the Original-Bill, notwithstanding he left word at their offices asking them to get in touch with him by phone, after they received the notice that said cause was to be taken in open court in due course they have now agreed to have the same taken by one of the standing EXAMINERS of this Honorable Court.

To the end therefore, YOUR PETITIONER, prays this Honorable Court to RESCIND the Order of March, 1928, permitting and allowing testimony to be taken in open Court; AND FURTHER that this Honorable pass an Order directing and permitting this cause to be referred to one of the STANDING EXAMINERS of this Honorable Court to take testimony to establish their allegations.


AND AS IN DUTY BOUND AND SO FORTH.



Solicitor for Thomas Richardson

STATE OF MARYLAND, BALTIMORE CITY, TO WIT:

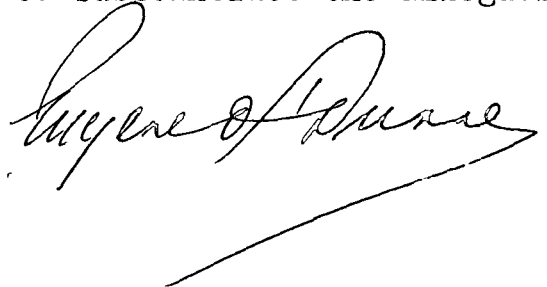
This is to certify that personally appeared before me the subscriber, a Notary Public, of the State of Maryland, in and for Baltimore City, this 13th., day of March, 1928, U. Grant Tyler, Solicitor for Thomas Richardson, herein named and did on behalf of the said Thomas Richardson make oath in due form of law that the matters and facts stated are true to the best of his knowledge and belief.



Notary- Public.

UPON ON THE FORGOING PETITION AND AFFADAVIT, IT IS ORDERED by the Circuit Court, Baltimore City, this 13 day of March, 1928, the the Order of March, 5th 1928, permitting and allowing testimony to be taken under the 30th., Equity Rule, be and the same is RESCINDED;

IT IS FURTHER ORDERED? ADJUDGED AND DECREED that the cause be referred to one of the standing EXAMINERS of this Honorable Court to take testimony to substantiate the allegations of the "BILL" in this cause.



Davis and Evans

3/6/28 215-8400
Davis & Evans

J. L. Ebaugh
Serrano Minister - J. L. Ebaugh - 3/6/28

W. Grant Taylor
Jas L Ebaugh

RECEIVED AT THE SHERIFF'S OFFICE ON MAR 6 1928 10 56 AM

CIRCUIT COURT

1316267
1927 Docket No.

Etta Richardson vs

Thomas Richardson

vs
Thomas Richardson

vs
Etta Richardson

(21)

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

No. B 31677
1177

FD. 5 Mch 1928

Copy of the within Petition and Order of Court served on Davis and Evans and J. L. Ebaugh, Solicitors on the 6th day of March, 1928, in the presence of William D. Bayar.

Dec 1/50

John E. Votaw Sheriff

Etta Richardson
vs
Thomas Richardson
and
Thomas Richardson
vs
Etta Richardson

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.

U. Grant Tyler
Cross-Bill
~~Solicitor~~ for Plaintiff.

Upon the foregoing Petition and Application it is this 5 day of March
A. D., 1928, 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 J. Steward Dawson and Evans or her Solicitor, on or before the 15 day of March 1928

Wm. M. D. Dwyer

Ct. Ct. ~~1927~~

67 162 13
1927

DOCKET No.

ETTA RICHARDSON
VS. Original- Bill
THOMAS RICHARDSON
and, Cross- Bill

THOMAS RICHARDSON
VS.
ETTA RICHARDSON

ORDER FOR APPEARANCE

B No. 31677
(16)

Filed 5 day of Me, 1928.

ETTA RICHARDSON

VS.

THOMAS RICHARDSON

and-----

Thomas Richardson

VS.

Etta Richardson

In the Circuit Court ~~No. 2~~
of Baltimore City

JANUARY

TERM, 1928.

MR. CLERK:

PLEASE ENTER MY APPEARANCE FOR DEFENDANT *etc.*

U. Grant Tyler

Solicitor for THOMAS RICHARDSON

I, the undersigned, authorize and empower, U. Grant Tyler, to
enter his appearance for me in both cases herein filed and to
act for me and on my behalf for and as my Solicitor, in said
cases, hereby discharging and dismissing all others by me
heretofore employed in this cause.

Thomas Richardson

Plaintiff in the Cross Bill and Defendant in
the Original Bill.

Solicitor.

67B-162

IN THE CIRCUIT COURT
OF
BALTIMORE CITY.

B 162
1928

ETTA RICHARDSON

VS.

THOMAS RICHARDSON

B 31677

(15)

ANSWER

Mr. Clerk
Please file

James E. Blough
Atty for Defendant.

FILED *12 Jan 1928*

ETTA RICHARDSON

IN THE CIRCUIT COURT

VS.

OF

THOMAS RICHARDSON

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:


The answer of Thomas Richardson to the Supplementary Bill of Complaint respectfully represents unto Your Honor:-

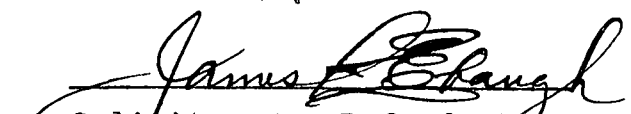
First: That he admits the allegations contained in paragraph ONE, referring to their marriage on January 17, 1923, but denies that he deserted her on January 5, 1927.

Second: That he denies the allegations contained in paragraphs TWO, THREE, FOUR, FIVE, SIX and SEVEN and demands strict proof thereof.

And having fully answered said Supplementary Bill of Complaint, he prays that the same may be dismissed with his costs.

AND AS IN DUTY BOUND ETC.


Defendant


Solicitor for Defendant

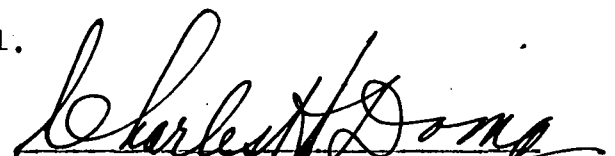
STATE OF MARYLAND

CITY OF BALTIMORE

TO WIT:

I HEREBY CERTIFY that on this 10 day of January, 1928, before me the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared Thomas Richardson and made oath in due form of law that the matters and facts contained in the foregoing answer are true to the best of his knowledge and belief.

WITNESS my hand and Notarial Seal.


Notary Public.

Circuit Court

162
192 7

Docket 67B

Etta Richardson

vs.

Thomas Richardson
and cross Bill

"Frick"

Petition for leave to take
Testimony and Order of
Court thereon

B No. 31677
[19]

Filed 15 March 1928

3/12/3/35

Circuit Court

Richardson

vs.

Etta Richardson

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 *Etta Richardson*

plaintiff,

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.

George Evans
Solicitor for *plaintiff in regard
bill*

ORDERED, this *15th* day of *March* 192*8*, 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.

Rayne D. Durr