

3/12/1940

On the line below
AZ 338
Baltimore City 1921

Suzie Brown

5

Wm A Brown

1405 Borne

June A V ^{Alley} _{uncle}

W. B. K. pleace

~~CO~~

B 226 54
(1)

DAVIS & BISHOP
ATTORNEYS AT LAW
BANNER BUILDING
12 E. PLEASANT STREET
BALTIMORE, MD.
Feb 1941

Susie Brown

In The Circuit Court

vs

of

William Addison Brown

Baltimore City.

To The Honorable, The Judge of Said Court:

Your oratrix complaining respectfully states:-

FIRST, that the parties hereto were married on or about November 23rd. 1915 by Rev. Sharpe, a Baptist minister in Baltimore City Maryland and lived together as man and wife until on or about October 3rd. 1921.

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 and deserted your oratrix to live in adultery with lewd and abandoned women whose names are unknown to your oratrix. That the said desertion and adultery has continued uninterruptedly for more than three years prior to the filing of this bill of complaint. That the said defendant has declared his intentions to live no longer with your oratrix. That the said separation of the parties are beyond any reasonable hope or expectation of reconciliation.

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

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

SIXTH, that your oratrix is without means with which to defray the expenses of this litigation; that she is advised by counsel that she is entitled to have an order passed by this Honorable Court awarding her a sum certain as alimony during the progress of this suit and a further sum to compensate her solicitor for his services in the cause.

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.

c-c Counsel fee, alimony Pendite Lite.

e-e To resume her maiden name.

Susie Brown



Attorney For Complainant.

State of Maryland)
) To Wit
Baltimore City)

I hereby certify that on this 1st day of July
1921, before me the subscriber, a Notary Public in and for
Baltimore City, State of Maryland, personally appeared Susie
Brown, 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 her knowledge and belief.

Caroline Murray

Notary Public.

125-133

338 B61

Ct. Ct.

192

Docket No.

Brown

Does not live at the address

Brown

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

1405 (Boring alley)
22654

(2) (5)

Filed

12 July

192

J S Davis

SOLICITOR

13

Now East.

Thomas F. McTully
(Brooks) Sheriff

July 13-1921

Subpoena returned to August return day

Chas R. Oldenford Clerk

Now East
Thomas F. McTully
(Brooks) Sheriff

EQUITY SUBPOENA

The State of Maryland

To

William A Brown

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

Susie Brown

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 **9th** day of **May** 192 **1**

Issued the *J* day of **July**, in the year 192 **1**

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.

(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

William Brown



Subpoena served to August return day

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

Susie Brown

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 **9th** day of **May** 192 **1**

Issued the *J* day of **July**, in the year 192 **1**

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.)

61 **B** Docket 338
1921

CIRCUIT COURT.

Brown

vs.

Brown

1405 (same as)

Order for Alimony

Pendente Lite

ORDER

B No.

22654

(3)

\$250 Weeks

1 child

Fd.:

9 July 1921

3

Non Est. Thomas J. Brooker
Sheriff

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

Lusie Brown

vs.

William A. Brown

May TERM, 1921

ORDERED BY THE COURT this *9th* day of *July* 1921

that the defendant *William A. Brown*

pay to the plaintiff *Lusie Brown*

the sum of *Eight*

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

day of *July* 1921 to the said plaintiff *Lusie Brown*

as alimony, *pendente lite* unless cause to the contrary be shown on or before the *25*

day of *July* 1921, provided a copy of this Order be served on the said defendant

William A. Brown on or before the *20*

day of *July* 1921

Charles H. Hinkley

TRUE COPY—TEST:

CLERK

B Docket.....

CIRCUIT COURT.

vs.

Order for Alimony

Pendente Lite

ORDER

B No......

()

Copy

Fd.:

Susie Brown

vs.

William A Brown

IN THE
CIRCUIT COURT

OF

BALTIMORE CITY

May

TERM, 192

ORDERED BY THE COURT this 9th day of July 1921

that the defendant William A Brown

pay to the plaintiff Susie Brown

the sum of Eight

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

day of July 1921 to the said plaintiff Susie Brown

as alimony, *pendente lite* unless cause to the contrary be shown on or before the 25th

day of July 1921, provided a copy of this Order be served on the said defendant

William A Brown on or before the 20th

day of July 1921

Chas W Henwick

TRUE COPY—TEST:

Chas R Whiteford

CLERK

CIRCUIT COURT

339 B64
19 21 Docket No.

Suee Brown

vs.

William A. Brown

ORDER OF APPEARANCE

Mr. Clerk

Please File

Thomas J. Skarr

Sol. for Defendant

B 22654

No.

(4)

Filed 11 day of July 1921

Susie Brown

vs.

Wm A. Brown

IN THE
Circuit Court
OF
BALTIMORE CITY

Term, 19

Mr. WHITEFORD, Clerk.

Enter my appearance for Defendant

Thomas J. Skane
Solicitor

J. Stewart Davis

338 B Ct. Ct.
1921 No. 61 Docket.

Susie Brown

vs.

William Nelson Brown

MOTION FOR HEARING

No. 13 22654
L67

Thos. J. Skane

Filed 2 day of August 1921

Susie Brown

vs.

William A. Brown

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The Plaintiff

by J. Stewart Davis

her

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

Calendar for hearing on *summary*

in conformity with the First Equity Rule.

J. Stewart Davis

Solicitor for Plaintiff

Serve on
Thos. J. Skane

B-338
1921 No. Ct. Ct.
Docket

Susie Brown

vs.

William A. Brown

NOTICE OF HEARING

B No. 22654
(7)

No.

Filed 3 day of August 1921

Copy of the within Notice served on Thos J Skane
Solicitor with the 6th day of August 1921 in
presence of Mary B Evans
Fees \$ 0.50
Thomas G. M. Mully
Shenck

SUSIE BROWN

VS

WILLIAM A. BROWN

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

Circuit Court

33 P
19 21 B 61 No. Docket.

Brown

vs.

Brown

Final Order, Counsel Fee and Alimony
Pendente Lite.

B 22654

No. 8 B.

Filed 8 Aug 1921

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

Susie Brown
vs.

Wm. A. Brown

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 ^{8th}..... day
of August..... 1921, that the defendant
..... pay to the plaintiff
..... the sum of..... Dollars, as counsel fee
for the Solicitor of the..... and that he
further pay the sum of Five..... Dollars per week,
to the said Susie Brown
as Alimony *pendente lite* accounting from the 8th day of August..... 1921
and continuing until the..... day of..... 19....., (should this suit be
so long pending) or until the further order of this Court.

Walter P. Daniels

Serve on

140 S Borne Alley

Ct. Ct. 338 B61 B 338
1921

Susie Brown

vs.

William Addison Brown

ORDER OF COURT

B 22654

No. B.

9

Filed 31 Aug 1921
13

Copy of the within Order of Court served on
William Addison Brown on the 2nd day of
September 1921, in presence of Harry J Brooks
Thomas J. Mc Mully
Sheriff

Susie Brown

vs.

William Addison Brown

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this 31st day of August 1921
 that the defendant appear before this Court in person,
 on the 6 day of Sept 1921 at 10 o'clock A. M., and then and there show cause,
 if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying
 the Order of this Court passed on the 8th day of Aug. 1921 directing the
 payment of Alimony, pendente lite, by him to the plaintiff
 provided a copy of this Order be served on the said defendant
 on or before the 7 day of Sept 1921

John J. Doves

338

CIRCUIT COURT

338 B61

19 21 Docket No.

Susie Brown

vs.

William A Brown

Motion to strike out
~~ORDER OF APPEARANCE~~

Mr. Clerk

Please File

Sol. for

P

No. 22654

Filed 17th day of Sept 1911

Jessie Brown

vs.

William A. Brown

IN THE
Circuit Court
OF
BALTIMORE CITY

Term, 19

Mr. WHITEFORD, Clerk.

Strike out
Please ~~Enter~~ my appearance for Defendant

Thomas J. Skane
Solicitor

In the Circuit Court of Baltimore City.

B 338
- 1921

Susie Brown

VS

William Addison Brown

-

Mr. Clerk:-

Please file &c.

ISIDOR GOLDSTROM

Solicitor for Respondent.

B 22654
(11)

ISIDOR GOLDSTROM
ATTORNEY AT LAW
1057 CALVERT BUILDING
BALTIMORE

fd 13 Sept 1921

IN THE CIRCUIT COURT OF BALTIMORE CITY

SUSIE BROWN

VS

WILLIAM ADDISON BROWN

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Respondent for answer to the Bill of Complaint and Petition for alimony and counsel fee heretofore filed against him in this Honorable Court, by Isidor Goldstrom, his attorney, respectfully represents:-

First. Your respondent admits that he was married to the complainant on or about November twenty-third, 1915, in the City of Baltimore and State of Maryland.

Second. He admits that he has been a resident of the City of Baltimore and State of Maryland for more then two years immediately prior to the filing of the Bill of Complaint against him.

Third. For answer to the allegations contained in paragraph three and four of the Complainant's Bill of Complaint your respondent says that he denies having committed adultery and that he deserted or abandoned the complainant or that he ever declared his intention to live no longer with the complainant but on the contrary says that it came to your respondent's attention that the complainant was committing adultery with one Thomas Carroll and upon your respondent charging the complainant with so doing on or about October third, 1920, he was ordered and forced to leave his place of abode, 1626 Pearce Street, Baltimore, and that the abandonment and desertion of him was committed by the complainant and was unjust and unwarranted and has continued until this time; and your respondent further says that the said Susie Brown is at this

time living in adultery with the said Thomas Carroll.

Fourth. Your respondent admits that there are no children born as the result of said marriage.

Fifth. Your respondent says that the allegations of adultery and abandonment against him contained in the complainant's Bill of Complaint are so general vague, indefinite and impossible that your respondent ought not be compelled to pay alimony to the complainant until such time as this cause will come on for hearing upon its merits especially since your respondent earns the average weekly wage of Nine dollars which is not sufficient for him to provide himself with the necessities of life.

To the end therefore.

Your respondent having fully answered the Bill of Complaint and Petition for alimony and counsel fee herein filed against him respectfully prays to be hence dismissed with his reasonable costs.

As in duty bound &c.

Wm Addison Brown *Richard Goldstrom*

Solicitor for Respondent.

STATE OF MARYLAND, CITY OF BALTIMORE, to wit:

I HEREBY CERTIFY, that on this twelfth day of September, 1921, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore, personally appeared William Addison Brown and made oath in due form of law that the matters and facts set forth in the foregoing Answer to the Bill of Complaint and Petition for counsel fee and alimony heretofore filed against him are true to the best of his knowledge, information and belief.

WITNESS my hand and Notarial Seal.

Anna Sklar
Notary Public.

J. Steward Davis

Entered

338 B61
1921 No.

Ct. Ct.
Docket.

Brown

vs.

Brown

MOTION FOR HEARING

B

No.

22654

(12)

Filed

13

day of

Sept 19 21

Freda Goldstein

Susie Brown

vs.

William A Brown

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The Plaintiff by J Steward Davis

Solicitor 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 J Steward Davis

Serve on

Isidor Goldstrom

B338

1921

No.

Ct. Ct.

Docket

Brown

vs.

Brown

NOTICE OF HEARING

B No. 22654
13

No.

Filed 15 day of Sept 1921

Copy of the within Notice served on Isidor Goldstrom
Solicitor on the 17th day of September 1921 in
presence of Atany B Fram
Fees \$ 0.50
Thomas J. M. Maulty
Sheriff

Susie Brown

vs

William A Brown

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

Balto Sep 23/23

BINDER WEIGHTS

OLD MATERIAL HAULED

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To the Hon Judge							
This is the amount drawn							
weekly from Sep 3 rd to Present							
Time		Sep 3 rd	10 20				
		10 th	9.90				
		16 th	11 40				
		23 rd	1 00				

His Pay is 30[¢] Per Hr 9
Hr constitute a Day work
and he has always reported
for work but owing to the
weather at times he has to
lose wet weather and also
the days that the ^{concrete} mixer stop
I can recommend him as one
of my best workers C. W. Van Dambur

Circuit Court

338
19 21 B 61 No. Docket.

Bram

vs.

Bram

Final Order, Counsel Fee and Alimony
Pendente Lite.

B 22654

No. B.

14

Filed *26 Sept* 19 *21*

Essie Brown
vs.

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

William Brown

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 26th day of Sept 1921, that the defendant pay to the plaintiff the sum of Three Dollars, as counsel fee for the Solicitor of the _____ and that he further pay the sum of _____ Dollars per week, to the said _____ as Alimony *pendente lite* accounting from the 26 day of Sept 1921 and continuing until the _____ day of _____ 19____, (should this suit be so long pending) or until the further order of this Court.

Three probate department of the Supreme Bench.

Charles W. Hensler

Serve on

Ct. Ct. 538 B. 338
1921

Brown

vs.

Brown

1405- Born Allie

ORDER OF COURT

B
22654
No. B.

15
17 Nov 1921
13'

*Thomas J. M. Mully
Sheriff*

*Non Est
(Brooks)*

Susie Brown

IN THE

CIRCUIT COURT

vs.

OF

BALTIMORE CITY

Wm Addison Brown

~~1705 Borne alley~~
1405 Borne alley

Ordered by the Circuit Court of Baltimore City this 17th day of November 1921 that the defendant appear before this Court in person, on the 28th day of November 1921, at 10 o'clock A. M., and then and there show cause, if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying the Order of this Court passed on the 26th day of September 1921, directing the payment of Alimony, pendente lite, by him to the plaintiff. provided a copy of this Order be served on the said on or before the 25th day of November 1921

[Handwritten Signature]

[Faint handwritten notes]

Serve on

Ct. Ct.

B 191

vs.

ORDER OF COURT

No. B.

COPY.

Filed191

61' B 436

Susie Brown

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY

vs.

Wm Addison Brown

~~1705 Bevine Alley~~

Ordered by the Circuit Court of Baltimore City this 17th day of November 1921

that the defendant appear before this Court in person,

on the 28th day of November 1921 at 10 o'clock A. M., and then and there show cause,

if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying

the Order of this Court passed on the 26th day of September 1921, directing the

payment of Alimony, pendente lite, by him to the plaintiff

provided a copy of this Order be served on the said

on or before the 25th day of November 1921

Chas W. Heuisler

True Copy

Test Chas R. Whiteford
Clerk.

Serve on

Wm Addison Brown

1405 Borne Alley

Ct. Ct.

61 B 338
191

Susie Brown

vs.

Wm Addison Brown

ORDER OF COURT

B 22654

No. B.

(16)

9 Jan

Filed 1912

13

Thomas F. M. Mully
Sheriff

Non Est
(Brooks)

Suse Brown

IN THE

CIRCUIT COURT

vs.

OF

BALTIMORE CITY

Wm Addison Brown
1405 Borne Alley

Ordered by the Circuit Court of Baltimore City this 9th day of January 1922 that the Defendant appear before this Court in person, on the 16th day of January 1922 at 10 o'clock A. M., and then and there show cause, if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying the Order of this Court passed on the 26th day of Sept 1921, directing the payment of Alimony, pendente lite, by him to the plaintiff provided a copy of this Order be served on the said defendant on or before the 13th day of January 1922

Carroll J. Bond

Serve on

Ct. Ct.

B. 191

Susie Brown

vs.

Wm. Addison Brown

ORDER OF COURT

No. B.

COPY.

Filed 191

SUSIE BROWN

vs.

Wm. ADDISON BROWN

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this 9th . . . day of . January 1922
 that the defendant appear before this Court in person,
 on the 16th . . . day of . . . January 1922 at 10 o'clock A. M., and then and there show cause,
 if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying
 the Order of this Court passed on the 26th . . . day of . . . September 1921¹ , directing the
 payment of Alimony, pendente lite, by him to the . . . plaintiff
 provided a copy of this Order be served on the said . . . defendant
 on or before the 13th . . . day of January 1922⁹¹ .

CARROLL T. BOND

TRUE COPY

TEST,

Chas R Whiteford

 CLERK