

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

*B 288  
1927*

SARAH SARAH LOUISE WILSON

VS.

JAMES P. WILSON

*1120 Etting St.*

BILL FOR DIVORCE.

*B 31917*

Mr. Clerk:-

Please file.

ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS  
ATTORNEYS AT LAW

*Filed June 14 1927*

SARAH LOUISA WILSON

:

IN THE CIRCUIT COURT

VS.

:

OF

JAMES P. WILSON

:

BALTIMORE CITY

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully says:

1. That she was married to her husband, James P. Wilson on the 15th day of October, 1925 and with whom she resided until the 9th day of June, 1927.
2. That for some years past the said James P. Wilson, her husband, has treated her with great cruelty, harshness and brutality, at times striking and beating her and that his conduct has now become so intolerable that she can endure it no longer.
3. That ever since said marriage your Oratrix has behaved herself as a faithful, affectionate and chaste wife towards the said James P. Wilson and her entire conduct has always been above reproach.
4. That there are no children born as result of said marriage.
5. That her husband, the said James P. Wilson, is seized and possessed of a large amount of real and personal estate in this State, <sup>and also a salary of \$452 per week</sup> while your Oratrix is without means of support, except from her own labor and the charity of her friends.
6. That your Oratrix is wholly destitute of means of supporting herself during the pendency of this suit, or of defraying the costs and expenses attending the prosecution of the same.

TO THE END, THEREFORE, YOUR ORATRIX PRAYS:

- (a) That she may be divorced a mensa et thoro from the said James P. Wilson, her husband.
- (b) That she may be declared to be entitled to receive, by way of alimony, such an allowance out of her said husband's estate as may be proportioned to the means and station in life of her said husband.
- (c) That, in the meantime, the said James P. Wilson may be required to pay unto your Oratrix a reasonable sum for her support and maintenance during the pendency of this suit, and such sum or sums of money as may enable your Oratrix to employ counsel to prosecute this suit and to defray the necessary costs and expenses thereof.
- (d) That your Oratrix may have 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 James P. Wilson, 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.

\_\_\_\_\_:         Hain & Evans          
PLAINTIFF                                  ATTORNEYS FOR PLAINTIFF

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this        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 the City aforesaid, personally appeared Sarah Louisa Wilson and made oath in due form of law that the matters and facts in the foregoing bill are true as therein stated.

AS WITNESS my hand and Notarial Seal.

\_\_\_\_\_  
NOTARY PUBLIC

P224

Ct. Ct.

B-288  
192 7 Docket No.

Sarah Louise Wilson

vs.

James P. Wilson

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B-31917  
(2)

Filed 28 June, 1927  
Davis & Evans  
SOLICITOR

10

RECEIVED AT  
THE SHERIFFS OFFICE OF

JUN 15 1927 9 33 AM

*Summoned and a copy of the Process left with  
the defendant  
Bieby  
6/15/27  
New \$0.95  
John C. Potee  
Sheriff*

EQUITY SUBPOENA

The State of Maryland

On James P. Wilson

1120 Etting Street

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

Sarah Louise Wilson

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 14th day of June, in the year 1927.

Charles 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.



RECEIVED AT  
THE SHERIFFS OFFICE OF

JUN 15 1927 9 34 AM

B Docket *288*  
*1927.*

**CIRCUIT COURT.**

SARAH L. WILSON

vs.

JAMES P. WILSON  
1120 Etting St.

**Order for Alimony**

Pendente Lite

ORDER

B No. *31917*  
*(3) (4)*

Fd: *14 June 1927*  
*27 Feb 1928*

*Copy of the within Order of Court served on  
James P. Wilson on the 15<sup>th</sup> day of June 1927  
in the presence of August J. Bishop*

*John E. Potter  
Sheriff*

*Dec \$0.75*

IN THE  
**CIRCUIT COURT**

OF  
BALTIMORE CITY

May TERM, 1927

SARAH LOUISA WILSON

vs.

JAMES P. WILSON

ORDERED BY THE COURT this 14<sup>th</sup> day of June 1927

that the defendant James P. Wilson

pay to the plaintiff Sarah L. Wilson

the sum of Fifteen -----

Dollars per week, during the continuance of this suit, accounting from the 14<sup>th</sup>

day of June 1927 to the said plaintiff Sarah L. Wilson

as alimony, *pendente lite* unless cause to the contrary be shown on or before the 29<sup>th</sup>

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

James P. Wilson on or before the 21<sup>st</sup>

day of June 1927

*H. Arthur Stump*

TRUE COPY—TEST:

CLERK

A copy of the foregoing order having been served upon the defendant as is shown by the Sheriff's return hereon, and no cause to the contrary having been shown, it is this *27* day of *February* 19 *28*, ordered by the Circuit Court of Baltimore City that the same be, and it is hereby made absolute and final.

*Theresa A. Dunning*



Serve on

Ct. Ct.

B 288  
1927

James P. Wilson

Sarah Louisa Wilson

9% Hoffberger's Ice & Coal Co

vs.

~~Low St. Bunk Md~~

James P. Wilson

# 1507 N Gay St.

ORDER OF COURT

No. 31917 B. 5

Filed

27 Feb  
7 April 1928

1928

non est

Recd  
copy of the within Order of Court served on  
James P. Wilson on Feb 10<sup>th</sup> day of March 1928  
in presence of Joseph H. Hazlony John E. Porter  
John E. Porter Sheriff

Dec 10-75

RECEIVED  
MAR 27 1928 3 45 PM  
DEPT. OF JUSTICE  
RECORDS OFFICE

*Sam Louna Wilson*

vs.

*James P. Wilson*

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this *February* day of *1928*  
that the *defendant* appear before this Court in person,  
on the *5<sup>th</sup>* day of *March*, 1928, 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 *27* day of *February*, 1928 directing th  
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 *3* day of *March* 1928

*Raymond B. ...*

*Davis + Evans.*

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 7 day of March 1928, that the time for showing cause under said Order be extended to the 12 day of March 1928, and the time for service of a copy of the same be extended to the 10 day of March 1928.

*Thyges Dunning*



Serve on

James Wilson  
of Hoffberger Ice Co  
Gay + Oliver St,

Ct. Ct.

288-1927

B 288

1927

Sarah Wilson

vs.

James P. Wilson

ORDER OF COURT

B 31917  
(7)

No. B.

Filed 19 March 1928

6

copy of the within order of Court served on  
James P. Wilson on the 24<sup>th</sup> day of  
March 1928 in presence of Joseph H. Glosky  
John E. Pattee  
Sheriff

fees \$0.75

MAR 19 1928 4 13 PM

THE SHERRIFF'S OFFICE

COURT

RECEIVED

*Sarah Wilson*

*James P. Wilson*

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this *19<sup>th</sup>* day of *March* 192*8*  
that the *defendant* appear before this Court in person,  
on the *27<sup>th</sup>* day of *March*, 192*8*, 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 *27* day of *February*, 192*8*, 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 *24* day of *March* 192*8*

*Davis + Evans.*

*Wm M. O'Rourke*



B-288  
1927  
IN THE CIRCUIT COURT  
OF BALTIMORE CITY B288

1928

SARAH LOUISE WILSON  
VS.  
JAMES P. WILSON.

B 31917

ANSWER. (8)

MR. CLERK:  
PLEASE FILE, ETC.,

*Joseph C. Santry*  
Solicitor for Respondent.

JOSEPH C. SANTRY  
ATTORNEY AT LAW  
2 EAST LEXINGTON STREET  
BALTIMORE, MD.

FILED 28 Meh 1928

SARAH LOUISE WILSON

IN THE CIRCUIT COURT

VS.

OF

JAMES P. WILSON

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF THE SAID COURT:

The Answer herewith of James P. Wilson by his solicitor Joseph C. Santry respectfully shows:

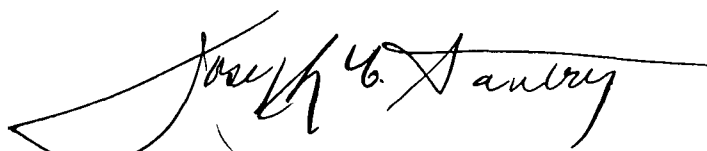
FIRST: Your Respondent answering the first paragraph of the said Bill of Complaint admits the marriage of the parties hereto.

SECOND: Your Respondent answering the second paragraph of the said Bill of Complaint denies the matters and facts therein contained and alleges that the said plaintiff's conduct was brutal and vicious and upon one occasion she cut the said defendant with a knife.

THIRD: Your Respondent answering the fourth paragraph of the said Bill of Complaint admits the matters and facts therein contained.

FOURTH: Your Respondent answering the fifth and sixth paragraphs of the said Bill of Complaint admits that he owns two pieces of property on which he pays weekly dues of Thirty-five Dollars and Fifty-seven Cents and is now receiving therefrom the weekly rental of Eleven Dollars per week; one of his houses being vacant by reason of the damage done by the said plaintiff and that the said defendant's salary is Thirty Dollars per week.

Wherefore your Respondent having fully answered each and every paragraph of the said Bill of Complaint prays to be hence dismissed with his usual costs.

  
Solicitor for the Defendant.

STATE OF MARYLAND, CITY OF BALTIMORE , TO WIT:

I HEREBY CERTIFY that on this *22<sup>nd</sup>* day of March before me the  
subscriber a Notary Public of the State of Maryland in and for  
the City of Baltimore aforesaid personally appeared James P.  
Wilson the Respondent in the above-entitled case and he made oath  
in due form of law that the matters and facts herein recited  
are true to the best of his knowledge and belief.

*Katherine Sinnott*  
Notary Public.

288-1927

IN THE CIRCUIT COURT  
OF  
BALTIMORE CITY

B 288  
B 1927

SARAH LOUISE WILSON

VS.

JAMES P. WILSON

PETITION

B 31917

(9)

MR. CLERK:

PLEASE FILE, ETC.,

*Joseph C. Santry*

Solicitor for the petitioner.

JOSEPH C. SANTRY

ATTORNEY AT LAW

2 EAST LEXINGTON STREET

BALTIMORE, MD.

FILED

24 April 1928

3/13/3/43

SARAH LOUISE WILSON

VS.

JAMES J. WILSON

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IN THE CIRCUIT COURT

OF

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT;

The Petition herewith of James P. Wilson by his solicitor Joseph C. Santry respectfully shows:

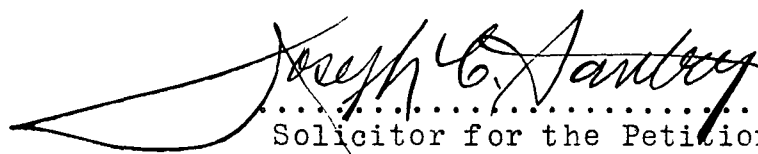
FIRST: That on June 14th, 1927 the said Sarah Louise Wilson filed a Bill of Complaint for a divorce a mensa et thoro and alimony against the said defendant and that on June 15, 1927 this Honorable Court passed an order allowing the said plaintiff the sum of Fifteen Dollars per week and on February 27th, 1928 the said order was made final.

SECOND: That the said defendant was not represented by counsel and unable to pay the said amount, but has recently been paying the sum of Five Dollars per week to his said wife.

THIRD: That on March 19th, 1928 the said defendant was ordered to appear in this Honorable Court on the 27th, of March 1928 to show cause why he should not be punished by this Honorable Court for not obeying the order passed on February 27th, 1928.

Your said Petitioner therefore prays this Honorable Court to modify this order of June 19th, 1927 whereby the said defendant was ordered to pay the sum of Fifteen Dollars per week until further orders of this Honorable Court, that the order of March 19th, 1928 whereby the said defendant was ordered to appear in this Honorable Court on March 27th, 1928 be quashed and dismissed.

AND AS IN DUTY BOUND, ETC.,

  
.....  
Solicitor for the Petitioner.



The plaintiff Sarah Louise Wilson by her solicitors Davis and Evans hereby assent to the modification of the decree of June 14th, 1927 from Fifteen Dollars per week to the sum of Five Dollars per week to be paid to the Probation Departement of the Supreme Bench of Baltimore City and also assent to the quashing and dismissal of the order of March 19th, 1928 whereby the said defendant was cited in this Honorable Court for not obeying the order of February 27th, 1928.

*Davis & Evans*

.....  
Solicitor for the Plaintiff.

ORDERED by the Circuit Court of Baltimore City this 24<sup>th</sup> day of April, 1928, that upon the foregoing Petition of James P. Wilson that the Order of June 14th, 1927, allowing the said Sarah Louise Wilson the sum of Fifteen Dollars per week, be and the same is hereby modified, that the said Sarah Louise Wilson be and she is hereby allowed the sum of Five Dollars per week, and it is further ORDERED that the said Order of February 27th, 1928 commanding the said James P. Wilson to be in this Honorable Court to show cause why he should not be punished for contempt in not obeying the said Order, be and the same is hereby quashed and dismissed.

*Raymond D. ...*  
.....