

IN THE CIRCUIT COURT  
NO. 2  
BALTIMORE CITY-

GENEVA TAYLOR

VS.

WILLIAM M. TAYLOR

*2007 Eddy St.*

Bill for Divorce

- A VINCULO MATRIMONII-

*No 25,850 B*

Mr: Clerk:

Please file &c-

*Roy S. Bond*  
Sol. for Complainant-

ROY S. BOND  
ATTORNEY AT LAW  
220 ST. PAUL PLACE  
BALTIMORE, MD.

FILED

*6<sup>th</sup> October 1925*

THE DAILY RECORD COMPANY  
Baltimore, Md.

GENEVA TAYLOR  
  
VS.  
  
WILLIAM M. TAYLOR

IN THE  
  
CIRCUIT COURT NO. 2  
  
BALTIMORE CITY.

TO THE HONORABLE-THE JUDGE OF SAID COURT:

Your Oratrix, Geneva Taylor complaining, respectfully says:

(1) That she was married to her husband, William M. Taylor, in Baltimore City, State of Maryland, on or about the 21st day of May, 1918, with whom she resided until on or about the 15th day of September, 1925.

(2) That both parties are residents of Baltimore City, State of Maryland, and have been for more than two years prior to the filing of this, her Bill of Complaint.

(3) That though the conduct of your Oratrix, Geneva Taylor, towards her said husband, William M. Taylor, has always been kind, affectionate, and above reproach, he without just cause or reason, has declared his intentions to live with her no more; that without provocation, he has been excessively cruel in his treatment towards her and excessively abusive and vile in his conduct and by his vicious and vile conduct cause her to desert him; that his acts were deliberate and final and committed without her procurement, connivance, or consent, and that she has not lived with the defendant, nor condoned the offense since the day of separation, and there is no reasonable hope or expectation of a reconciliation.

(4) That the defendant, William M. Taylor, has on divers days and times since the said marriage, committed the crime of adultery with divers lewd women, whose names will be dis-

closed on the day of trial, and that the said acts were committed without her procurement, connivance or consent and she has never lived with him nor condoned the offense since she discovered the same.

(5) That your oratrix has been a good, faithful, chaste and affectionate wife to the said defendant.

(6) That your oratrix is without means to defray the expenses of this litigation and that the defendant, William M. Taylor, is a man of means employed as a laborer and earns so far as she can ascertain about THIRTY(\$30:00) DOLLARS, per week, and that she is advised by Counsel that she is entitled to have an order passed by this Honorable Court, awarding her a certain sum as alimony during the progress of this suit, and a further sum to compensate her Solicitor for his services in this case.

(7) That there are two minor children as issue of said marriage, Melvin M, aged four(4) years, and Ralph E, aged three years respectively.

WHEREFORE YOUR ORATRIX PRAYS:

- a- That a decree be passed divorcing your Oratrix, A Vinculo Matrimonii, from the defendant- William M. Taylor-
- b- The care and custody of their minor children, Melvin and Ralph Taylor,
- c- Permanent alimony for the support of herself and minor children,
- d- Such other and further relief as the case may require.

AS IN DUTY BOUND, etc.,

Geneva Taylor  
Complainant-

Ray L. B. [Signature]  
Sole for-Complainant-

STATE OF MARYLAND

BALTIMORE CITY - to wit-

I HEREBY CERTIFY THAT ON THIS <sup>6<sup>th</sup></sup> day of  
October, 1925, before me, the subscriber, a Notary Public  
of the State of Maryland, in and for Baltimore City, per-  
sonally appeared- GENEVA TAYLOR- Complainant- and made oath  
in due form of law, that the matter and facts set forth, in  
this her Bill of Complaint, are true to the best of her  
knowledge and belief.

AS WITNESS MY HAND AND NOTARIAL SEAL-

*Eleanna S. Wright*  
-NOTARY PUBLIC-



prv

Ct. Ct. No. 2

572  
1925

B

Docket No. 34

Taylor  
vs.

Taylor

Subpoena to Answer Bill of Complaint

Pro

No. 215850 B  
2

Copy - copied

Filed 23<sup>rd</sup> October, 1925

Woy S. Bond  
Solicitor.

11

Summored and a copy of Process left with  
the Defendant  
John C. Potter  
Shuff

Recd \$0.80

By att  
(10/7/25)

EQUITY SUBPOENA

The State of Maryland

To

*William M. Taylor*  
*11007 Etting 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 *October*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

*Geneva Taylor*

against you exhibited in the CIRCUIT COURT NO. 2 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 *14<sup>th</sup>* day of *September*, 192 *5*  
Issued the *6<sup>th</sup>* day of *October*, in the year 192 *5*

*John Keasants*  
Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

SERVE ON

*William M Taylor*

*2007 E. King St*

B  $\frac{572}{1925}$  Docket *34*

# Circuit Court No. 2

*Taylor*

vs

*Taylor*

**Order Counsel Fee and Alimony**

Pendente Lite

**ORDER**

No. *715850* B.

*Copies - kept*

Filed *7<sup>th</sup> October* 19*25*

*11*

*Copy of the within Order of Court served on  
William M Taylor on the 7<sup>th</sup> day of October 1925  
in presence of Joseph C Lyett*

*John C Potes  
Shirley*

*Dec \$0.50*

IN THE  
**CIRCUIT COURT No. 2**  
OF  
**BALTIMORE CITY**

*Geneva Taylor*

*William M. Taylor*

*September* TERM, 192*.5*

ORDERED BY THE COURT, this *7<sup>th</sup>* day of *October*, 192*.5*,

that the defendant *William M. Taylor*

pay to the plaintiff *Geneva Taylor*

the sum of *ten*

Dollars per week, during the continuance of this suit as Alimony, pendente lite, unless cause to the contrary be shown on or before the *23<sup>rd</sup>*

day of *October*, 192*.5*, provided a copy of this Order be served on the said defendant

*William M. Taylor* on or before the *13*

day of *October*, 192*.5*, the question of Counsel fee being reserved for the further determination of this court.

*James P. Gorton*

TRUE COPY—TEST:

*\$30. per week*  
*2. children*

Clerk.



*James on*  
William M. Taylor  
2007 E. King St.

*B 572/1925*

IN THE  
CIRCUIT COURT NO. 2  
Baltimore City.

GENEVA TAYLOR

VS.

WILLIAM M TAYLOR

*2007 E King Street*

-PETITION- + *Order*

*No 2585013*  
+  
Mr: Clerk:

Please file &c-

*Roy S. Bond*

Sol. for Petitioner-

*Copy order = kept*

ROY S. BOND  
ATTORNEY AT LAW  
220 ST. PAUL PLACE  
BALTIMORE, MD.

FILED *7<sup>th</sup>* October 1925

THE DAILY RECORD COMPANY  
Baltimore, Md.

*Copy of the within Petition and Order of Court  
Served on William M Taylor on the 7<sup>th</sup> day of October  
1925 at 5:45<sup>o'clock</sup> Pm in Presence of Joseph E. Lyett*

*John E. Potes  
Sherriff*

*Fee \$0.50*

*545 Pm*

GENEVA TAYLOR  
  
VS.  
  
WILLIAM M. TAYLOR

IN THE  
CIRCUIT COURT NO. 2  
BALTIMORE CITY.

TO THE HONORABLE-THE JUDGE OF SAID COURT:

Your Petitioner, Geneva Taylor complaining, respectfully says:

(1) That heretofore, your petitioner, Geneva Taylor, has filed a bill for divorce, A Vinculo Matrimonii, in this Honorable Court, on the grounds of cruelty and and adultery.

(2) That at divers times and places before the filing of this, her Bill of Complaint, her husband, the said William M. Larkins, has molested and abused your petitioner ~~Geneva Taylor~~ on several occasions having drawn a knife and threatened to end her life.

(3) That although he has deserted and abandoned your petitioner, Geneva Taylor, without provocation and has in nowise properly contributed to her support since his desertion, he follows your petitioner around and abuses her, threatening to do her bodily harm and terminate her life in keeping with his threat. That she is afraid of her husband and believes that he intends to inflict serious bodily harm or kill her.

WHEREFORE YOUR PETITIONER PRAYS

-a- That this Honorable Court pass an order restraining and enjoining the defendant, William M. Taylor, in this case, from in anywise interfering with, molesting or attacking your petitioner, Geneva Taylor, both during the

pendency of this suit, and pending the further order of this Honorable Court,

-b- Such other and further relief as the case may require.

AS IN DUTY BOUND-etc-

Geneva Taylor  
Petitioner

Raymond  
Sbl. for Petitioner-

STATE OF MARYLAND  
BALTIMORE CITY - to wit-

I. HEREBY CERTIFY THAT ON THIS 6<sup>th</sup> day of October, 1925, before me, the subscriber, a Notary Public, of the State of Maryland, in and for Baltimore City, personally appeared Geneva Taylor petitioner, and made oath in due form of law, that the matter and facts set forth, in this, her petition, are true to the best of her knowledge and belief.

AS WITNESS MY HAND AND NOTARIAL SEAL-

Edward S. Wright  
-NOTARY PUBLIC-

UPON THE AFOREGOING BILL OF COMPLAINT, Petition  
and Affidavit, it is this *7<sup>th</sup>* day of October, 1925,  
ordered by the Circuit Court, No. 2 of Baltimore City, that  
the defendant, William M. Taylor, in the above entitled  
cause, be and he is hereby enjoined and restrained during  
the pendency of these proceedings or until the further  
Order of this Court, from in anywise interfering with, mo-  
lesting or attacking the said Complainant, Geneva Taylor,  
and that a copy of this order be served on the said defendant,  
William M. Taylor.

*James P. Lorter*

IN THE CIRCUIT COURT NO.2

OF

BALTIMORE CITY.

*13572*  
*1925*

GENEVA TAYLOR

VS.

WILLIAM M. TAYLOR.

RESPONDENT'S ANSWER.

Mr. Clerk:-

Please file.

*No 25850 B.*  
*5*

*Davis & Evans*

ATTORNEYS FOR RESPONDENT.

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

*By 23<sup>rd</sup> Oct 1925*

GENEVA TAYLOR : IN THE CIRCUIT COURT NO.2

VS. : OF

WILLIAM M. TAYLOR : BALTIMORE CITY.

---

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the petition in the above entitled cause, respectfully represents:

- I. That he admits the allegations contained in the first paragraph of the petition.
2. That he denies with great emphasis the allegations contained in the second paragraph of the petition.
3. That he denies with great emphasis the allegations contained in the third paragraph of the petition.

WHEREFORE your respondent prays that the petition be dismissed with costs to the plaintiff.

*Javis Evans*  
ATTORNEYS FOR RESPONDENT.

IN THE CIRCUIT COURT NO. 2

OF *B 572*  
*1925*  
BALTIMORE CITY.

GENEVA TAYLOR

VS.

WILLIAM M. TAYLOR

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

*Davis & Evans*

ATTORNEYS FOR RESPONDENT.

*No 25850 B*  
*6*

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

*By 24<sup>th</sup> October 1925*

BAUMGARTEN & CO., INC.

GENEVA TAYLOR : IN THE CIRCUIT COURT NO.2

VS. : OF

WILLIAM M. TAYLOR : BALTIMORE CITY.

---

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your respondent to the Bill of Complaint in the above entitled cause respectfully says:

1. That he admits the allegations contained in the first paragraph of the bill of complaint.
2. That he admits the allegations contained in the second paragraph of the bill of complaint.
3. That he denies with great emphasis the third paragraph of the bill of complaint.
4. That he denies with great emphasis the fourth paragraph of the bill of complaint.
5. That he denies the fifth paragraph of the bill of complaint.
6. That he denies the sixth paragraph of the bill of complaint.
7. That he admits the seventh paragraph of the bill of complaint.

Wherefore your respondent prays that the bill of complaint be dismissed with costs to the plaintiff.

*Daves Evans*

Attorneys for Respondent.



Proy. S. Bond

42

15

Cir. Ct. No. 2

572-  
192 3-

Docket No. 343-

GENEVA TAYLOR

vs.

WILLIAM M. TAYLOR

**MOTION FOR HEARING**

No. 25850 B  
7

Filed 27 November 1925

Davis and Evans

CIRCUIT COURT NO. 2  
IN THE  
OF  
BALTIMORE CITY

GENEVA TAYLOR

vs.

WILLIAM M. TAYLOR


IN THE  
**Circuit Court No. 2**

OF  
BALTIMORE CITY

The Plaintiff, Geneva Taylor, by - Roy S. Bond-

her Solicitor, applies to have the above entitled cause placed in the  
Trial Calendar for hearing on the question of alimony

In conformity with the First Equity Rule.

  
Solicitor for Plaintiff--

Serve on

Davis & Evans

Parents

Davis & Evans Nov 3<sup>rd</sup> 1925

1642

Cir. Ct. No. 2

572  
1925

B

Docket No. 34

Taylor

vs.

Taylor

NOTICE AS TO HEARING

1 copy

No. 25850 B

8  
Copy Keaped

Filed Paul Stuecken, 1925

H

Copy of the within notice served on Davis and Evans,  
Solicitors on the 3<sup>rd</sup> day of November, 1925, in the  
presence of Louis Hecht.

John E. Polce  
Sheriff

Fee \$0.50

216  
St Paul

STONEWALL  
LINEN LEAD

*Geneva Taylor*  
vs.  
*William M. Taylor*

IN THE  
**CIRCUIT COURT, No. 2**  
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 *Monday*

when reached in due course on the said calendar.

JOHN PLEASANTS,  
Clerk Circuit Court No. 2.

343 -  
Ct. Ct. No. 2

B. 572  
1925

---

GENEVA TAYLOR

---

vs.

WILLIAM M. TAYLOR

---

---

Final Order, Counsel Fee and Alimony  
*Pendente Lite,*

---

No. 25850 B.  
9

Filed 13<sup>th</sup> November 1925

GENEVA TAYLOR

vs.

WILLIAM M. TAYLOR

IN THE  
CIRCUIT COURT No. 2  
OF  
BALTIMORE CITY.

The petition for Alimony pendente lite and Counsel fee and the answer thereto in the above entitled cause coming on for final hearing and the respective parties having been heard;

It is Ordered by the Circuit Court No. 2 of Baltimore City this 13<sup>th</sup> day of November ----- 192 5, that the ---defendant, William M. Taylor

pay to the -----plaintiff, Geneva Taylor,

the sum of ----- Dollars, as Counsel Fee

for the Solicitor of the ----- and that he

further pay the sum of nine ----- Dollars per week,

during the continuance of this suit, to the said plaintiff, Geneva Taylor--

as Alimony pendente lite accounting from the 6<sup>th</sup> day of November ----- 1925.

Payments to be made through The Prisoners Aid Association.

*Robert J. Gault*

SERVE ON

Roy S Bond - atty  
220 St. Paul Place

Service Admitted  
July 8 1927  
R.S. Bond



99

40

Circuit Court No. 2

572  
1926

DOCKET No. 34B

Geneva Taylor

vs.

William Taylor

PETITION AND ORDER TO TAKE  
TESTIMONY UNDER 30TH RULE

(1)

No. 25850 B.  
(10)

copy - bond

Filed 6th July 1927

17

Copy of the within Petition and Order of Court served  
on Roy S. Bond, Solicitor on the 8th day of July, 1927,  
in the presence of Lawrence A. Norah.  
John P. Pate Sheriff  
Jee 1075

*Geneva Taylor*

vs.

*William Taylor*

IN THE  
Circuit Court No. 2  
—OF—  
BALTIMORE CITY

To the Honorable, the Judge of the  
Circuit Court No. 2 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 therefore prays your Honor to pass an order, according to the Statutes for such cases made and provided.

And as in duty bound will ever pray.

*Davis & Evans*

Solicitor for Plaintiff

Upon the foregoing Petition and Application it is this *6th* day of *July*  
A. D. 192*7*, 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 *Defendant*

or his Solicitor, on or before the *11th* day of *July*, 192*7*

*Robert F. Stanton*



B572/1925

IN THE  
CIRCUIT COURT NO. 2  
BALTIMORE CITY.

-- GENEVA TAYLOR

VS.

WILLIAM H. TAYLOR.

PETITION TO AMEND.

MR: CLERK:

No 25850 B.

L117

PLEASE FILE &c.,

*Roy S. Bond*

SOL. FOR COMPLAINANT.

ROY S. BOND

ATTORNEY AT LAW

220 ST. PAUL PLACE

BALTIMORE, MD.

FILED

7th October 1924

GENEVA TAYLOR

IN THE

VS.

--CIRCUIT COURT NO. 2--

WILLIAM H. TAYLOR

BALTIMORE CITY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

The Petitioner- GENEVA TAYLOR- Plaintiff in the above entitled cause respectfully represents unto your Honor:

FIRST: THAT HERETOFORE, to wit: on or about the -6th- day of October, 1925, your petitioner, filed in this Honorable Court, her Bill of Complaint, against WILLIAM H. TAYLOR, the abovenamed defendant, praying for a divorce, A Vinculo Matrimonii.

SECOND: THAT YOUR PETITIONER, desires to file an amended bill of complaint, on the ground of adultery, on the part of the defendant, and praying a divorce, A Vinculo Matrimonii.

THIRD: WHEREFORE YOUR PETITIONER prays that leave may be granted her to file an Amended Bill of Complaint against the said WILLIAM M. TAYLOR, for the purpose of praying a divorce, A Vinculo Matrimonii.

AS IN DUTY BOUND, etc.,

*Paul Bond*  
-----  
Sol. for Plaintiff.

*the* ORDERED BY THE Circuit Court, No. 2 of Baltimore City this *7th* day of October, 1927, on the foregoing petition, that leave be granted, and it is hereby granted Geneva Taylor, the Plaintiff, to file an amended bill of complaint as prayed.

*Robert J. ...*

Geneva Taylor  
Petitioner.

STATE OF MARYLAND  
BALTIMORE CITY -- to wit--

I HEREBY CERTIFY that on this <sup>6<sup>th</sup></sup> day of October, 1927, before me, the subscriber, a Notary Public of the State of Maryland, in and for Baltimore City, personally appeared- GENEVA TAYLOR, Complainant, and made oath in due form of law, that the matter and facts set forth in this her petition are true to the best of her knowledge and belief.

AS WITNESS MY HAND AND NOTARIAL SEAL.

Eleanor S. Wright  
NOTARY PUBLIC.

IN THE CIRCUIT  
COURT NO. 2  
BALTIMORE CITY.

*B542/1925*

GENEVA TAYLOR

VS.

WILLIAM H. TAYLOR

AMENDED BILL OF  
COMPLAINT.  
A VINCULO MATRIMONII.

MR: CLERK:

*No 25850 B.*  
*L125*

PLEASE FILE &c.,

*Roy S. Bond*  
-----  
Sol. for Complainant.

ROY S. BOND  
ATTORNEY AT LAW  
220 ST. PAUL PLACE  
BALTIMORE, MD.

FILED

*7th October 1927*

-- GENEVA TAYLOR

IN THE

VS.

-- CIRCUIT COURT NO. 2--

WILLIAM M. TAYLOR

BALTIMORE CITY.

---

TO THE HONORABLE- THE JUDGE OF SAID COURT:

The Amended Bill of Complaint of GENEVA TAYLOR, leave of Court having been first had and obtained to file the same, respectfully says:

FIRST:

THAT on or about the- 21st- day of May, 1918, your Oratrix, and William M. Taylor, the abovenamed defendant were intermarried in Baltimore City, State of Maryland, and the parties hereto thereafter resided together as man and wife until on or about the- 15th- day of September, 1925.

SECOND:

THAT THE DEFENDANT, WILLIAM M. TAYLOR, has on divers days and times since the said marriage, committed the crime of adultery with divers lewd women, whose names will be disclosed on the day of trial, and that the said acts were committed without her procurement, connivance or consent, and that she has not lived with the said defendant nor cohabited with him since she discovered the same.

THIRD:

THAT THE CONDUCT of your Oratrix during and since the said marriage, has been above reproach in all respects, having always been a kind, affectionate and good wife, to the said defendant, her husband.

FOURTH:

THAT THERE ARE TWO MINOR children as issue of said marriage.

TO THE END THEREFORE YOUR ORATRIX PRAYS:

- a- THAT A DECREE BE passed divorcing  
your Oratrix, A VINCULO MATRIMONII--
- b- THE CARE AND CUSTODY OF THEIR MINOR  
CHILDREN-- AND MAINTENACE FOR THEIR SUPPORT--
- c- SUCH other and further relief as the  
case may require.

MAY IT PLEASE YOUR HONOR, to grant unto your Oratrix- GENEVA TAYLOR, the writ of subpoena, directed unto the said defendant- WILLIAM M. TAYLOR, residing I3I3 North Mount Street, commanding him to be and appear in this court, in person or by Solicitor, on some day certain to be therein named, and perform such decree as may be passed in the premises.

AS IN DUTY BOUND, etc.,

  
SOL. FOR COMPLAINANT.

P 67  
Circuit Court No. 2

572 34B  
1926 DOCKET No.

Taylor

vs.

Taylor

1313 N. Monroe St.  
Anniston

SUBPOENA TO ANSWER BILL OF COMPLAINT

PW

No. 25850 B.  
1137

Copy Conical

Filed 10 day of Oct 1927

Roy & Bond

Solicitor.

14

Summoned and a copy of the process left  
with the defendant John E. Potts  
(11/28/27)  
(10/8/27)

Recd \$0.95

OCT 7 1927 3 37 PM

RECEIVED AT  
THE SHERIFF'S OFFICE ON

EQUITY SUBPOENA

The State of Maryland

To

*William M. Taylor*  
*1313 North Mount 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 *October*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

*Geneva Taylor*

against you exhibited in the CIRCUIT COURT NO. 2 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 *13* day of *September*, 192*7*  
Issued the *7* day of *October*, in the year 192*7*

*John Seecasaut*

Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)



IN THE CIRCUIT COURT OF

#2

BALTIMORE CITY.

34 B 572/1925

GENEVA TAYLOR

VS.

WILLIAM TAYLOR.

RESPONDENT'S ANSWER.

Mr. Clerk:-

Please file.

*Davis & Evans*

ATTORNEYS FOR RESPONDENT

*No 25850 B.*

*L147*

DAVIS & EVANS  
ATTORNEYS AT LAW

*Filed 18 - October 1927*

GENEVA TAYLOR

:

IN THE CIRCUIT COURT #2

VS.

:

OF

WILLIAM TAYLOR

:

BALTIMORE CITY.

---

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the amended bill of complaint in this cause exhibited, respectfully says:

- (1) That he admits the allegations contained in the first paragraph of the amended bill.
- (2) That he denies the allegations contained in the second paragraph of the amended bill.
- (3) That he neither admits nor denies the allegations contained in the third paragraph of the amended bill.
- (4) That he admits the allegations contained in the fourth paragraph of the amended bill.

WHEREFORE your respondent prays that the bill be dismissed with his proper costs.

AND as in duty bound, etc.

*Davis Evans*  
ATTORNEYS FOR RESPONDENT

Circuit Court No. 2

572  
192 5 B DOCKET 34 No. ....

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GENEVA TAYLOR

---

vs.

WILLIAM M. TAYLOR--

---

---

---

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

---

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*Sub*

No. 25850 B.  
L157

Filed 19 - October 192 7

GENEVA TAYLOR

IN THE

Circuit Court No. 2

vs.

-OF-

WILLIAM M. TAYLOR.

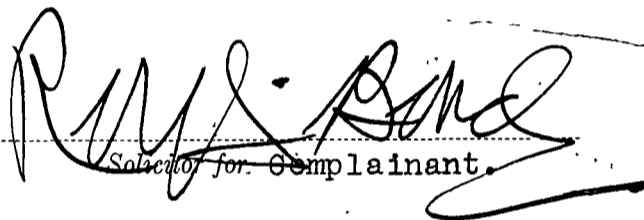
BALTIMORE CITY

To the Honorable the Judge of the  
Circuit Court No. 2 of Baltimore City:

THE PETITION OF -- Geneva Taylor----

Complainant-----

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.

  
Subscribed for Complainant.

ORDERED, this 19th day of October 1927, 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. Forten

Cir. Ct. No. 2.

572  
1925 B

D. No. 34

General  
William Taylor

vs

William  
General Taylor

Attachment in Equity.

Nov 19 1927  
Washed away  
meat of costs  
Robert Stanton

No. 25850 B  
4167

Filed 19 day of Nov 1927  
7-14

"Attached" 11/19/1927 Washed on costs Judge Stanton.  
John C. Foster  
Sheriff.

Exp. of costs - \$1.00  
Sheriff's costs - \$2.00  
W. J. Jaid - \$3.00

11/19/27  
J.C.

RECEIVED AT  
THE SHERIFF'S OFFICE ON

NOV 14 1927 10 14 AM

(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 William Taylor living at 1313 N. Mount St. Working at the Baltimore Copper Works, Canton. Work No. is 1254.

FILED

if he shall be found in your bailiwick, and him in safe keep, so that you have him before the Judge of the Circuit Court No. 2 of Baltimore City, at the Court House in the same city, on the day in 19 , to answer as well touching a certain contempt by

him committed in not complying with the order of Circuit Court No. 2, passed on the 13th day of November, 1925 to the effect that he pay \$9.00 per week for the support of his family, payments to account from the 6th day of November, 1925. Arrears to Nov. 10, 1927 -- \$1,97.00

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Balti-

more City, the 14th day of November 1927

Issued the 14th day of November 1927

John Pleasant Clerk.

Let the attachments issue Robert F. Stanton

IN THE CIRCUIT COURT NO.2

OF

579 BALTIMORE CITY. 34B  
1925

GENEVA TAYLOR

VS.

WILLIAM TAYLOR.

P E T I T I O N

Mr. Clerk:

Please file.

*Davis & Evans*

ATTORNEYS FOR PETITIONER

No 25850 B.

L177

DAVIS & EVANS  
ATTORNEYS AT LAW

*Filed 13 - January 1928*

*Service of copy  
admitted this  
12<sup>th</sup> day of Jan  
1928*

*R.M. Bond  
atty for plaintiff  
↓*

GENEVA TAYLOR

:

IN THE CIRCUIT COURT NO.2

VS.

:

OF

WILLIAM TAYLOR

:

BALTIMORE CITY.

---

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The petition of William Taylor, the defendant, respectfully represents to your Honor:

1. That on or about the 6th day of October, 1925 a Bill for divorce was instituted in the above entitled cause, against him.
2. That on or about the 13th day of November, 1925 an order was passed by this Honorable Court awarding the plaintiff nine dollars per week as alimony pendente lite accounting from the 6th day of November, 1925.
3. That at the time of the passing of this order your petitioner was regularly employed, but that recently your petitioner's work has been irregular and his weekly salary has been substantially reduced.
4. That your petitioner cannot under his present wage, meet the payments of alimony pendente lite and have sufficient money to maintain himself.

WHEREFORE, YOUR PETITIONER PRAYS:

- (a) That the order of Court passed on the 13th day of November, 1925 be re-considered and that the alimony awarded thereunder be reduced in accordance with his ability to pay.
- (b) Such other and further relief as his case may require.

  
ATTORNEYS FOR PETITIONER



17

Ordered by the Circuit Court No.2 of Baltimore City  
this 13<sup>th</sup>- day of January, 1928 that the plaintiff, Geneva Taylor,  
show cause on or before the 28<sup>th</sup>- day of *January* 1928, why the  
order passed on the 13<sup>th</sup> day of November, 1925 should not be re-  
considered and alimony therein awarded ~~be~~ reduced, provided a copy  
of this order be served on the plaintiff or her Counsel of record  
on or before the 18<sup>th</sup>- day of January, 1928.

James P. Gortler

~~B 34/1928~~

IN THE <sup>34 B 572</sup>  
CIRCUIT COURT NO. <sup>1925</sup>  
- BALTIMORE CITY.

GENEVA TAYLOR

VS.

WILLIAM TAYLOR.

( Answer to Petition )

Mr: Clerk:  
*No 25850 B.*

*<187*

Please file &c.,

*Roy S. Bond*  
Sole for Respondent.

Roy S. Bond  
14 East Pleasant St  
Baltimore Maryland.

FILED *19- January 1927*

GENEVA TAYLOR

IN THE

VS.

CIRCUIT COURT NO. 2

WILLIAM TAYLOR

BALTIMORE CITY.

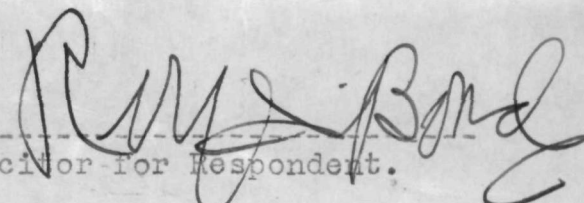
TO THE HONORABLE- THE JUDGE OF SAID COURT:

Your Respondent- GENEVA TAYLOR- to the petition for the reduction of alimony respectfully says:

- (1). THAT SHE ADMITS THE ALLEGATIONS contained in paragraph ONE.
- (2). THAT SHE ADMITS the allegations contained in paragraph TWO.
- (3). THAT SHE DOES NOT KNOW whether he husband,'s work has been irregular and his salary substantially reduced or not, but if the same be material to her rights in the premises, she requires strict and legal proof of same.
- (4). IN ANSWER TO PARAGRAPH FOUR, your petitioner says, her husband- William Taylor, is supporting and maintaining another woman, and considerable behind in his alimony, and seems to be inclined not to support his own children.

WHEREFORE YOUR PETITIONER PRAYS:

THAT THE PETITION heretofore be dismissed and the order thereon vacated.

  
-----  
Solicitor for Respondent.

*Geneva Taylor*  
Respondent.

STATE OF MARYLAND  
BALTIMORE CITY - to wit--

I HEREBY CERTIFY that on this <sup>17th</sup> day of  
January, 1928, before me, the subscriber, a Notary Public,  
of the State of Maryland, in and for Baltimore City, person-  
ally appeared *Geneva Taylor*, Respondent,  
and made oath in due form of law, that the matter and facts  
set forth, in this, her answer to petition, are true to the  
best of her knowledge and belief.

AS WITNESS my hand and Notarial Seal.

-----  
NOTARY PUBLIC.



Doc. 34 B <sup>572</sup> 1925

In the Circuit Court, <sup>Nov 2</sup>  
OF BALTIMORE CITY

DEPOSITIONS

*Geneva Taylor*  
vs.  
*William M. Taylor*

No. 75850 B  
197

**PLAINTIFF'S COSTS**

Examiners ..... \$.....  
Copies .....  
Sheriff .....  
Stenographer .....  
\$ \_\_\_\_\_

**DEFENDANT'S COSTS**

Examiners ..... \$.....  
Copies .....  
Sheriff .....  
Stenographer .....  
\$ \_\_\_\_\_

*Ed 7 - December 1928*

3/19/2/12

Geneva Taylor  
vs.  
William M. Taylor

In the Circuit Court No. 2  
OF BALTIMORE CITY.

The above cause being at issue,

and notice having been given me by the Solicitor for the plaintiff  
of a desire to take testimony in the same, I, A. de RUSSY SAPPINGTON, one  
of the Standing Examiners of the Circuit Courts of Baltimore City, under and by  
virtue of an order of the above named Circuit Court, passed in said cause on the  
nineteenth day of October 1927, met on  
the twenty-first day of October in the year nineteen  
hundred and twenty-seven at my office, in the city of Baltimore, in the State  
of Maryland, and assigned the twenty-second day of October  
in the same year at 9.45 o'clock in the forenoon and the  
office of Roy S. Bond, Esq. in the City and State  
aforesaid, as the time and place for such examination of witnesses in said cause;  
at which last mentioned time and place I attended, due notice of such meeting  
having been given, and proceeded in the presence of the Solicitor of the  
plaintiff to take the following depositions, that  
is to say:—

GENEVA TAYLOR

VS.

WILLIAM M. TAYLOR

:

:

:

:

In the Circuit Court No. 2 of

Baltimore City.

Testimony taken before me, A. deRussy Sappington,  
Examiner, in the offices of Roy S. Bond, Esquire, in  
Baltimore, on October 22nd, 1927, at 9:45 A. M.

Mr. Roy S. Bond appeared for plaintiff.

- - -

Thereupon---

GENEVA TAYLOR,

the plaintiff, of lawful age, produced on her own behalf,  
being duly sworn, testified as follows:

By the Examiner:

Q State your name, residence and occupation?

A Geneva Taylor, 1910 McCulloh Street, domestic.

Q Do you know the parties to this suit?

A Yes, I am the plaintiff and my husband is the  
defendant.

By Mr. Bond:

Q When, where and by whom were you married?

A On May 21, 1918, by the Rev. Harvey Johnson, a Baptist Minister, in Baltimore City.

Q Are you living together now?

A No.

Q Which one left the other?

A He left me.

Q When did he leave you?

A About October 27th, 1925.

Q You said September 15th, 1925, in your Bill of Complaint?

A That is wrong. October 27th, 1925 is right.

Q What caused the separation?

A He wouldn't work and he took things out and told me to get out and the last time he ran me out with a knife and told me to get out.

Q Have you both been residents of the City of Baltimore, State of Maryland, for more than two years prior to the filing of this Bill?

A Yes.



Q How did you treat your husband?

A I always treated him kindly and faithful and loyal to him and always took care of him and did all I could to please him.

Q How did he treat you?

A In the first place he was cruel.

Q Since you became separated from your husband, has he been true to you?

A He has commenced living with another woman and has lived with her sometime.

Q You have filed an amended bill in this case. Why did you file that amended bill?

A Because this adultery I found out about was committed after I filed my original bill.

Q Then this adultery was committed after your original bill and before you filed your amended bill.

A Yes.

Q About when did you catch your husband in the act of adultery?

A It was about the first of October, this year.

Q Where?

A I went to the bedroom and found the woman in it. He was living with Edna Brown in Baltimore and I caught them in bed together.

Q What was the number of the house?

A 1313 Mount Street.

Q Did you have anyone with you when you found them in bed together?

A William Hall Harris was with me. He is here today.

Q Did they admit living there as husband and wife?

A Yes.

Q Have you ever forgiven or condoned your husband's offense since you learned of it?

A No, sir.

Q Were any children born as a result of your marriage?

A Three were born and two are living.

Q How much does your husband contribute for the support of those children?

A He was giving us nine dollars. The last two times he gave me six dollars.

Q He is perfectly willing to contribute six dollars a week for the children. Can you get along with that?

A I don't see how I can. They are older each day.

Q What does he make?

A Between twenty-five and twenty-eight dollars a week.

Q Do you ask the Court to grant you an order for him to pay you six dollars a week through the Prisoners Aid for the support of the children, pending the further Order of the Court?

A Yes.

Q Do you think you can get along with that at this time?

A I will try.

Q Do you want the care and custody of the children?

A Yes.

Q If given their care and custody, are you willing to care for them and do a mother's part by them?

A Yes, sir, I always have.

- - - -

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of 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.

A. -----

*Genevieve Taylor*

Thereupon---

ETHEL CARRINGTON,

a witness, of lawful age, produced on behalf of the plaintiff, being duly sworn, testified as follows:

By the Examiner:

Q State your name, residence and occupation?

A Ethel Carrington, 1923 Druid Hill Avenue, housewife.

Q Do you know the parties to this suit?

A Yes.

By Mr. Bond:

Q Do you remember when they were married and lived together as man and wife and held themselves out as such?

A Yes.

Q Which one left the other?

A He left her.

Q When was that?

A In October, 1925.

Q Have <sup>they</sup> you lived or cohabited together since?

A No.

Q Have both parties been residents of the City of Baltimore, State of Maryland, for more than two years prior to the filing of this Bill?

A Yes.

Q Has she lived or cohabited with him since he left her?

A No, sir.

Q Has she always conducted herself as a kind, faithful and affectionate wife?

A Yes, sir.

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

A Two living, one dead.

Q Do you think Mrs. Taylor is a fit and proper person to have the care and custody of the children?

A She certainly is.

- - - -

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of 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.

A. ---

*EW*  
Ethel Carrington

Thereupon---

WILLIAM HALL HARRIS,

a witness, of lawful age, produced on behalf of the plaintiff, being duly sworn, testified as follows:

By the Examiner:

Q State your name, residence and occupation?

A William Hall Harris, 1826 North Spring Street, porter.

Q Do you know the parties to this suit?

A Yes.

By Mr. Bond:

Q Mr. Harris, we summoned you here today to know what you know about the conduct of the husband of Geneva Taylor, William M. Taylor. Where did you see him and when and under what circumstances?

A At a house at 1313 Mount Street. I was with Mrs. Taylor and we found him in bed with a woman by the name of Edna Brown. They admitted living together as husband and wife.

Q About when was it you found them living in open adultery?

A About the first of October, 1927.



Q Was Mrs. Taylor with you and did she see the same thing?

A Yes, sir.

Q Were they in a bedroom?

A Yes.

Q Were they living together?

A Yes.

Q Has Mrs. Taylor forgiven or condoned her husband's offense since she learned of it?

A No, sir.

Q Has she lived or cohabited with him since she learned of his adultery?

A No, sir.

- - - -

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of 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.

A. *No*  
-----

*William Hall Harris.*

No other witnesses being named or produced before me, I then, at the request of the Solicitor..... of the Plaintiff closed the depositions taken in said cause and now return them closed under my hand and seal, on this seventh day of December in the year of Our Lord nineteen hundred and twenty-eight at the City of Baltimore, in the State of Maryland.

A. de Russy Sappington (SEAL)  
Examiner.

There are No Exhibits with these depositions, to wit:  
Plaintiff's Exhibit.....

Defendant's Exhibit .....

A. de Russy Sappington  
Examiner.

I, A. de RUSSY SAPPINGTON, the Examiner before whom the foregoing depositions were taken, do hereby certify that I was employed in assigning a day, and taking the said depositions upon two days, on both of which I was employed by the Plaintiff....., and on None by the Defendant.....

A. de Russy Sappington  
Examiner.

Circuit Court No. 2

<sup>592</sup>  
192 ~~37~~ DOCKET B No. 37

GENEVA TAYLOR

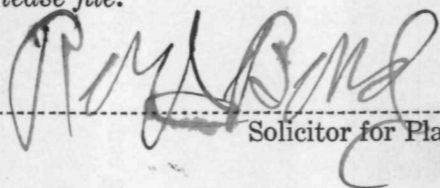
vs.

WILLIAM TAYLOR.

**SUBMISSION FOR DECREE.**

Mr. Clerk,

Please file:



Solicitor for Plaintiff.

No. 25850 B.  
< 20 >

Filed 7- December 1928

GENEVA TAYLOR

vs.

WILLIAM TAYLOR

IN THE

Circuit Court No. 2

-OF-

BALTIMORE CITY

November----- TERM, 192 8-

To the Honorable

The

Judge of the said Court:

The above cause is respectfully submitted for decree and the 41st General Equity Rule is hereby waived.

*Raymond*

Solicitor for Plaintiff,

*Davis*

Solicitor for Defendant.

Circuit Court

572  
1928-

Docket No. 34B

GENEVA TAYLOR

vs.

WILLIAM TAYLOR.

Order of Reference  
and Report

LYONS

No. 25850B.  
(21-22)

Order Filed 8- day of Dec 1928

Report Filed 18- day of Dec 1928

GENEVA TAYLOR

vs.

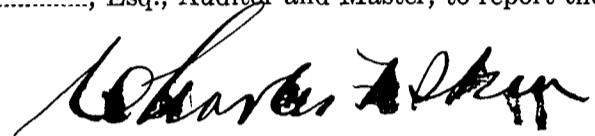
WILLIAM TAYLOR.

IN THE  
**Circuit Court**

OF  
BALTIMORE CITY

November----- Term, 192 8-

This case being submitted, without argument, it is ordered by the Court, this 8-  
day of December, 1928, that the same be and it is hereby referred to  
Wm. P. Lyons, Esq., Auditor and Master, to report the  
pleadings and the facts, and his opinion thereon.



**Report of Auditor and Master**

Bill for divorce a vinculo matrimonii, filed by the wife against  
her husband on the ground of adultery. Code Art. 16; Sec. 37-42.

Amended bill for divorce a vinculo matrimonii, filed by the wife  
against her husband on the ground of adultery. Code Art. 16; Sec. 37-42.

Defendant summoned and answered.

Plaintiff's residence in Baltimore City for more than two years  
prior to the filing of the bill proved.

The marriage proved.

Adultery proved.

Case made for awarding the guardianship and custody of the minor  
children of the parties to the plaintiff and charging the defendant  
with the maintenance and support of said children.

Thirty days have elapsed since the filing of the bill.

Case submitted for decree and 41st General-Equity Rule waived.

Case ready for decree.

William P. Lyons  
Auditor and Master.

December 17, 1928.

The within is a proper decree to  
be passed in this case.

*William P. Lyons*  
Auditor and Master.

Circuit Court No. 2

B<sup>-572</sup> 192 5 No. Docket

GENEVA TAYLOR

vs.

WILLIAM M. TAYLOR

DECREE OF DIVORCE

R

No. 25850 B.  
<237

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Filed 19 - December, 1928

✓



DECREE OF DIVORCE.

GENEVA TAYLOR

vs.

WILLIAM M. TAYLOR

IN THE

Circuit Court No. 2,

OF

BALTIMORE CITY

November

Term, 1928

This cause standing ready for hearing and being duly submitted, the proceedings were by the Court read and considered.

It is thereupon, this 19- day of December, Anno Domini, one thousand nine hundred and twenty-eight by the CIRCUIT COURT No. 2 OF BALTIMORE CITY, Adjudged, Ordered and Decreed, that the said GENEVA TAYLOR,

the above named complainant be, and she is hereby DIVORCED A VINCULO MATRIMONII, from the defendant, WILLIAM M. TAYLOR.

AND it is further ordered that the guardianship and custody of MELVIN M. TAYLOR and RALPH E. TAYLOR, minor children of the parties, be and they are hereby awarded to the Complainant, GENEVA TAYLOR, and the Defendant, WILLIAM M. TAYLOR, be and he is hereby charged with the maintenance and support of said children and shall pay therefor to the Complainant, through the Probation Department of the Supreme Bench, the sum of six dollars per week, all subject to the further order of this Court.

And it is further Ordered, that the said Defendant, WILLIAM M. TAYLOR, pay the cost of this proceeding.

Joseph N. Williams  
I, JOHN PLEASANTS, Clerk of the Circuit

Court No. 2 of Baltimore City, do hereby certify that the above is a true copy of the decree taken from the record of proceedings in said cause.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of the said Court, this day of 1928