

IN THE CIRCUIT COURT OF

BALTIMORE CITY

*B 496*  
*1926*

CHARLES THOMAS

VS.

EDNA THOMAS

*807 N. Calhoun St.*

BILL FOR DIVORCE

*B31200*

Mr. Clerk:-

Please file.

*Davis & Evans*

ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS  
ATTORNEYS AT LAW

*Filed 8 Nov 1926*

CHARLES THOMAS

:

IN THE CIRCUIT COURT

VS.

:

OF

EDNA THOMAS

:

BALTIMORE CITY

---

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

1. That he was married to his wife, Edna Thomas on the 15th day of April, 1912 and with whom he resided until the 24th day of October, 1926.
2. That though the conduct of your Orator toward the said defendant has always been kind, affectionate and above reproach, she has, without any just cause or reason, abandoned and deserted him and has declared her intentions to live with him no longer, and that such abandonment has continued uninterruptedly and is deliberate and final and the separation of the parties is beyond any reasonable expectation of reconciliation.
3. That your Orator has not lived or co-habited with the said defendant since said desertion.
4. That there are four children born as result of said marriage; Thelma, age thirteen years, Charles, age twelve years, John, age ten years and Doris, age seven months.
5. That both your Orator and the defendant are citizens of the State of Maryland having resided in Baltimore City for more than three years prior to the filing of this Bill of Complaint.

6. That both parties to this suit are owners by the entirety of 807 N. Calhoun Street and that because of the aforementioned differences which are irreconcilable and because the nature of the property does not permit of partition without injury to the interests of the parties to this suit,

TO THE END, THEREFORE YOUR ORATOR PRAYS:

- (a) That a receiver be appointed by this Honorable Court to take charge of all the assets held by your Orator and the defendant as tenants by the entireties in order to properly preserve the same during the pendency of this suit.
- (b) That a Trustee may be appointed with power and authority to sell same property and out of the proceeds realized less the legal charges and costs, pay to your Orator the amount that represents his interest in said property.
- (c) Custody of his son Charles.
- (d) A divorce A Mensa et Thora.
- (e) Such other and further relief as his case may require.

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

AND as in duty bound, etc.

*Oliver Evans*

---

SOLICITORS FOR PLAINTIFF.

P790

Ct. Ct.

B 496  
1926

Docket No.

Charles Thomas

vs

12-8-26 #15  
Edna Thomas.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Pw  
B 31200

2

Filed

13 Dec 1926  
Davis and Evans

SOLICITOR 'S

13

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

(Keene  
12-8-26)

Yes \$0.80

John E. Patee  
Sheriff

EQUITY SUBPOENA

The State of Maryland

On

*Edna Thomas*

*# 807 N. Calhoun 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 *December* next cause an appearance to be entered for you and your answer to be filed to the complaint of

*Charles Thomas.*

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

*8<sup>th</sup>* day of *November* 192 *6*

Issued the

*8<sup>th</sup>* day of *November*, in the year 192 *6*

*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.

496  
1926

66B.

In the  
Circuit Court No. 2  
of  
Baltimore City.

Charles Thomas

vs.

Edna Thomas.

B31200

(3)  
Answer

Mr. Clerk;  
Please file,

*N. Archie Hawkins*  
Solicitor for Defendant.

HAWKINS & McMECHEN  
ATTORNEYS AT LAW  
BANNEKER BUILDING  
14 E. PLEASANT STREET  
BALTIMORE, MD.

FILED

13 Dec 1926.

THE DAILY RECORD COMPANY  
Baltimore, Md.

Charles Thomas : In the  
: :  
: :  
vs. : Circuit Court ~~No. 2~~  
: :  
: of  
Edna Thomas : Baltimore City.

To the Honorable the Judge of said Court:

The Answer of Edna Thomas, the defendant, to the Bill of Complaint exhibited against her in this Honorable Court:

Your oratrix, answering says:-

-First-

That she admits the allegations set out in paragraph No. 1 of said Bill of Complaint.

-Second-

That she denies most emphatically any desertion or abandonment by her of the complainant, but she alleges that quite to the contrary if there has been any desertion or abandonment, your respondent and her four infant children are the victims of it, and the cause of it all is the complainant, Charles Thomas, who left their joint home because he prefers the society of other women.

-Third-

That your oratrix admits that since the 24th day of October 1926 when the complainant deserted her and her infant children, the parties hereto have not lived nor cohabited together, as alleged in paragraph No. 3 of said Bill of Complaint.

-Fourth-

That your oratrix admits the facts alleged in paragraph No. 4 of said Bill of Complaint concerning the existence, names and ages of their infant children.

-Fifth-

That your oratrix admits the residence of the parties hereto.

-Sixth-

That your oratrix admits that the property 807 N. Calhoun Street is held jointly by the parties hereto, but she denies that there are any irreconcilable differences between the complainant and your oratrix which would justify the sacrifice of it as a home for your respondent and her said infant children, but as to this and all other matters involved herein she submits humbly to what ever decree to the Court seems meet and proper.

Having answered said Bill of Complaint she respectfully asks to be hence dismissed with her bill of costs.

And as in duty bound, etc.

Edna Thomas

W. Aubrey Harrison  
Solicitor for Defendant.

State of Maryland, Baltimore City, to wit:

I hereby certify, that on this 13<sup>th</sup> day of December, 1926, before me, the subscriber, a Notary Public, of the State of Maryland, in and for Baltimore City aforesaid, personally appeared Edna Thomas, the defendant in the above cause, and made oath in due form of law that the matters and facts are true to the best of her knowledge and belief.

Charles J. J. J.  
Notary Public.



496  
1926

668

In the  
Circuit Court No. 2  
of  
Baltimore City.

Charles Thomas

vs.

Edna Thomas

Petition for Alimony penden-  
ti lite

Mr. Clerk;  
please file.

*W. Asaie Hawkins*  
Solicitor for Petitioner.

B31200  
47

HAWKINS & McMECHEN  
ATTORNEYS AT LAW  
BANNEKER BUILDING  
14 E. PLEASANT STREET  
BALTIMORE, MD.

FILED

THE DAILY RECORD COMPANY  
Baltimore, Md.

Charles Thomas	:	In the
	:	
	:	
vs.	:	Circuit Court No. <del>2</del>
	:	of
	:	
Edna Thomas	:	Baltimore City.

To the Honorable the Judge of said Court:

The Petition of Edna Thomas, the defendant in the above entitled cause, respectfully shows:

-First-

That the plaintiff has filed his bill in this Court for a divorce "a mensa et thoro" from your petitioner on the ground of desertion and abandonment, as will appear by reference to said bill of complaint in this cause.

-Second-

That your petitioner altogether denies said charge, and affirms that when said cause comes on to be heard, it will be seen by the Court that said charge is entirely destitute of foundation.

-Third-

That while denying that she has deserted or abandoned her husband, as alleged in his said bill of complaint, your petitioner admits it to be true that said plaintiff has not since October 24th, 1926, lived with her, although she has always been and is now willing and anxious for him to do.

-Fourth-

That your petitioner is advised that she is entitled to have an order passed by this Court requiring the plaintiff to pay her a reasonable and proper sum for alimony pendent lite for her personal support, and also a reasonable and proper sum to enable her to defray the necessary expenses of her defence to said bill, and to compensate the counsel whom she has employed to defend the said suit.

-Fifth-

That the plaintiff is a man of some means with a good bank account, a profitable occupation from which he receives not less and

often more than \$30 per week, and with an equity in the property 807 N. Calhoun Street, and that in view of the means of the plaintiff and of the serious charge against your petitioner, she is entitled to a liberal allowance to be made to her for her defence; and the amount of her alimony pendent lite should also be fixed according to the plaintiff's means and ability.

Your petitioner therefore prays your Honor to pass an order requiring the said Charles Thomas to pay her for alimony pendent lite such a sum, and at such intervals, as to the Court shall seem proper, to enable your petitioner to defray the expenses to which she will be put in defending said suit, including therein a reasonable fee to her counsel.

And as in duty bound, etc.

Edna Thomas.

W. Archie Hawkins  
Solicitor for Petitioner.

State of Maryland, Baltimore City, to wit:

I hereby certify, that on this 13<sup>th</sup> day of December, 1926, before me, the subscriber, a Notary Public, of the State of Maryland, in and for Baltimore City aforesaid, personally appeared Edna Thomas, the Petitioner, and made oath in due form of law that the foregoing Petition is true to the best of her knowledge and belief.

Charles Jennings  
Notary Public.

RECEIVED AT  
THE SHERIFF'S OFFICE ON

DEC 14 1926 11 32 AM

Docket 496  
1926

# Circuit Court

Charles Thomas.

VS.

Edna Thomas.

Order Counsel Fee and Alimony

Pendente Lite

No. B 31200  
(5)

W Ashbee Hawkins  
Sol.

Fd 13 Dec 1926

Now Est  
John E. Potee  
Shuff

Charles Thomas

vs.

Edna Thomas

—IN THE—

CIRCUIT COURT

—OF—

BALTIMORE CITY

November

TERM

ORDERED BY THE COURT this 13<sup>th</sup> day of December 1926

that the Plaintiff Charles Thomas

pay to the Defendant Edna Thomas

the sum of Fifty Dollars as Counsel Fee for the

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

Dollars per week, during the continuance of this suit, to the said Defendant Edna Thomas

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 28<sup>th</sup>

day of December 1926, provided a copy of this Order be served on the said Plaintiff

Charles Thomas on or before the 21<sup>st</sup>

day of December 1926

Critchman

TRUE COPY—TEST:

CLERK

*Copy*

Docket

**Circuit Court**

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*Thomas,*

VS.

---

---

**Order Counsel Fee and Alimony**

Pendente Lite

---

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No.

Charles Thomas.

vs.

Edna Thomas.

—IN THE—

CIRCUIT COURT

—OF—

BALTIMORE CITY

November

TERM

ORDERED BY THE COURT this 13<sup>th</sup> day of December 1926

that the Plaintiff Charles Thomas.

pay to the Defendant Edna Thomas.

the sum of Fifty Dollars as Counsel Fee for the

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

Dollars per week, during the continuance of this suit, to the said Defendant Edna Thomas

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 28<sup>th</sup>

day of December 1926, provided a copy of this Order be served on the said Plaintiff

Charles Thomas on or before the 21<sup>st</sup>

day of December 1926.

Eli Frank.

TRUE COPY—TEST:

Chas. R. Whiteford  
CLERK

496-1926

B 496  
1926

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

Charles Thomas

vs.

Edna Thomas

Edna Thomas

vs.

Charles Thomas

1704 N. Carey St

Cross-Bill of Complaint.

Mr. Clerk;  
Please file.

*W. Annie Hawkins*  
Solicitor for Defendant.

B 31200  
(6)

HAWKINS & McMECHEN  
ATTORNEYS AT LAW  
BANNEKER BUILDING  
14 E. PLEASANT STREET  
BALTIMORE, MD.

FILED *21 Dec 1926*



Charles Thomas	:	In the
	:	
vs.	:	
	:	
Edna Thomas	:	Circuit Court No. 2
	:	
	:	
Edna Thomas	:	of
	:	
vs.	:	
	:	
Charles Thomas	:	Baltimore City.

To the Honorable, the Judge of said Court:

Your oratrix, complaining, says:

-First-

That heretofore Charles Thomas, the husband of your oratrix, filed his bill of complaint against her in this Court, alleging among other things, that your oratrix had without just cause abandoned the said Charles Thomas, and that such abandonment has continued uninterruptedly since October 24th, 1926, and was deliberate and final, and the separation of the parties beyond any reasonable expectation of reconciliation, and thereupon the said Charles Thomas, prayed that he might be divorced "a mensa et thoro" from your oratrix.

-Second-

That your oratrix has answered said bill of complaint, and in her answer has shown that the said Charles Thomas is not entitled to any relief in this Honorable Court, but on the contrary thereof, your oratrix, of right and by the rules and practice of equity, ought to have relief in the premises; all of which matters will more fully appear by reference to said bill and answer.

-Third-

That prior to the time when it is alleged in said plaintiff's bill that your oratrix had abandoned her husband, Charles Thomas, he had treated her with great cruelty, harshness and brutality, and had committed the crime of adultery with Nellit Heigh, Jennie Bagley and other lewd, and abandoned women in the city of Baltimore.

-Fourth-

That four children whose names and ages have heretofore been mentioned in these proceedings were born from this marriage.

-Fifth-

That the parties hereto are both residents of the City of Baltimore, where they have resided for many more than the two years last past.

-Sixth-

That your oratrix has not condoned the offenses set out in paragraph No. 3 of this Bill of Complaint.

To the end, therefore,

-First-

That your oratrix may be divorced a vinculo matrimonii from the said Charles Thomas, her husband.

-Second-

That your oratrix may have the guardianship and custody of the four infant children of said marriage.

-Third-

That your oratrix may be declared to be entitled to receive, by way of alimony, such an allowance out of her said husband's earnings as may be proportioned to the means and station in life of her said husband.

-Fourth-

That, in the meantime, the said Charles Thomas 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.

-Fifth-

That the said Charles Thomas may be further required to deliver up to your oratrix possession of her said property, upon which he now

resides, in order that she may occupy and hold the same as her separate property.

-Sixth<sup>1</sup>/<sub>2</sub>

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 to the said Charles Thomas, residing in Baltimore City, commanding him to be and appear in this Court at some certain day, to be named therein, and answer the premises and abide by and perform such decree as may be passed therein.

And as in duty bound, etc.

X Mrs Edna Thomas.

W. Archie Hawks  
Solicitor for Defendant.

P 876

Ct. Ct.

B-496  
1926 Docket No.

Charles Thomas  
vs.  
Edna Thomas  
  
Edna Thomas  
vs.  
Charles Thomas

*Moved*  
1704 N. Carey St.

**SUBPOENA TO ANSWER BILL OF COMPLAINT**

No. B-31200

(7) (8)

Filed 10 Jan 1927  
" 14 Feb 1927  
W. Ashbie Hawkins SOLICITOR

*Non Est*  
*(Kozlovsky)*

*John E. Pottee*  
*Sheriff*

*10 Jan 1927*

REISSUED TO *February* *Robert Day, 193*  
*Chad R. Whiteford*

*Non Est*  
*(Kozlovsky)*

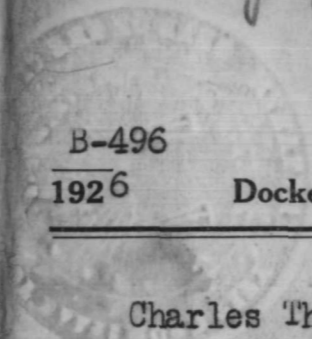
*John E. Pottee*  
*Sheriff*

RECEIVED AT THE SHERIFFS OFFICE ON JAN 25 1926

RECEIVED AT THE SHERIFFS OFFICE ON

SECURITY SUBPOENA  
The State of Maryland

Charles Thomas  
1704 N. Carey Street



of Baltimore City, Circuit Court

MEMORANDUM: For the Court of Chancery, Baltimore, Maryland, in the case of Charles Thomas vs. Edna Thomas, docketed in the Clerk's Office on the 10th day of January, 1927. The Court has reviewed the bill of complaint and the answer thereto and has concluded that the bill of complaint is sufficient to require the defendant to answer the same. It is the order of the Court that the defendant do answer the bill of complaint within the time specified in the subpoena hereto annexed. Witness my hand and the seal of the Court at Baltimore, Maryland, this 10th day of January, 1927.

EQUITY SUBPOENA

The State of Maryland

To Charles Thomas  
1704 N. Carey Street

*(copy)*

REISSUED TO February Return Day, 1927  
Chas R Whiteford  
Clerk

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 January next cause an appearance to be entered for you and your answer to be filed to the Cross-Bill of complaint of

Edna Thomas

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 8th day of November, 1926.  
Issued the 21st day of December, in the year 1926.

*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.

Davis and Evans.

66 B

Ct. Ct.

1926

No. 496 Docket

Charles Thomas

vs.  
Edna Thomas

MOTION FOR HEARING

B 31200  
(9)

No.

H. Ashbie Hawkins

Filed 14 day of Jan 1927

Charles Thomas

vs.

Edua Thomas

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

The *plaintiff* by *Davis Evans*

Solicitor *Sapplies* to have the above entitled cause placed on the Trial Calendar

for hearing *Bill & Auneal*

in conformity with the First Equity Rule.

*Davis + Evans*  
Solicitor for *complaint*

Serve on  
W.A.Hawkins

Acknowledged  
Jan. 17 - 1927  
Hawkins M. M. M. M.

<sup>14</sup>  
Present



Ct. Ct.

496  
1926 No. B-66 Docket

Charles Thomas

vs.

Edna Thomas

**NOTICE OF HEARING**

B-No. 31200  
(10)

No.

Filed 14 day of Jan. 1927

H

Copy of the within Notice served on W.A. Hawkins,  
Solicitor on the 17th day of January, 1927, in  
the presence of Louis Hecht.

Geo. P. O. O. Sheriff  
John E. Potee



Charles Thomas

vs.

Edna Thomas

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 **Bill & Answer**

when reached in due course on said calendar.

CHARLES R. WHITEFORD

*Clerk Circuit Court.*

Davis & Evans,

Ct. Ct.

496  
1926

No. B. 66 Docket

Charles Thomas

vs.

Edua Thomas

MOTION FOR HEARING

B 31200  
(11)

No.

Filed 14 day of Feb 1927

W. Ashlie Hawkins

*Charles Thomas*

vs.

*Edna Thomas*

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

The *defendant* by *H. Forbis Hawkins*

*Res* Solicitor, applies to have the above entitled cause placed on the Trial Calendar  
for hearing *on Petition for Alimony, Counsel fees etc.*

in conformity with the First Equity Rule.

*H. Forbis Hawkins*  
Solicitor for *Defendant*

Serve on  
Davis & Evans

*Davis & Evans*  
*Feb. 16/27.*

496  
1926 No. B-66 Docket

Ct. Ct.

Charles Thomas

vs.

Edna Thomas

**NOTICE OF HEARING**

B-No. 31200  
(12)

No.

Filed 14 day of Feb. 1927

*Copy of the within Notice served on Davis and Evans,  
Solicitors on the 16th day of February, 1927, in the  
presence of Louis Hecht. John E. Potter Sheriff  
Fees \$0.50*

*2.15  
St Paul*

RECEIVED AT  
THE SHERIFFS OFFICE ON  
FEB 15 1927 2 13 PM

CIRCUIT COURT

*H*

Charles Thomas

vs.

Edna Thomas

IN THE  
**CIRCUIT COURT**  
OF BALTIMORE CITY

Upon application made by the Solicitor for the

**Defendant**

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, Counsel fee, etc.

when reached in due course on said calendar.

CHARLES R. WHITEFORD

*Clerk Circuit Court.*

P 234

Ct. Ct.

B-496

19 26 Docket No.

Charles Thomas

vs.

Edna Thomas

**SUBPOENA TO ANSWER BILL OF COMPLAINT**

No. B-31200

(17)

Filed 14 Oct, 1929

G. L. Pendleton

SOLICITOR

13

Summons and a copy of the Process left  
with the defendant.

John E. Patee  
Sheriff

Des \$0.95

Keene

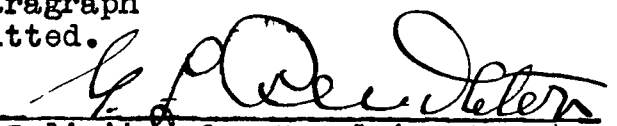
EP 11 1929 3 49 PM

Charles Thomas, \*  
\* In the Circuit Court of Baltimore City.  
vs \*  
\*  
Edna Thomas, \*  
\* To the Honorable, the Judge of said Court;

Charles Thomas, plaintiff in the above entitled case respectfully prays leave to amend his Bill of Complaint in the following manner and words.

1. That the defendant on divers time and on different occasions, committed the crime of adultery with divers different men their particulars names and places thereof are unknown to him except one Murry Roberts whose address is Baltimore City, but that since the discovery thereof he has not in anyway condoned same, of which took place since the filing of the original Bill of Complaint was filed hereof.

2. That he has filed no grounds in his original Bill of Complaint other than for a decree a mensa et thoro whereof he is advised he is entitled to a decree a vinculo matrimonii upon the ground stated in the foregoing paragraph  
Respectfully submitted.

  
Solicitor for Complainant.

Upon the foregoing petition of the Complainant, this 4<sup>th</sup> day of September 1929, by the Circuit Court of Baltimore City, that leave be and the same is granted as prayed to amend the Bill of Complaint in these proceedings.



In the Circuit Court  
of  
Baltimore City

*B 496*  
*1926*

Charles Thomas  
vs  
Edna Thomas

Answer to Cross-Bill of  
complaint.

*B 31200*  
*(14)*

Mr. Clerk, -  
Please file,

*G. L. Pendleton*

Solicitor for Charles  
Thomas.

G. L. PENDLETON  
ATTORNEY-AT-LAW  
14 E. PLEASANT STREET  
BALTIMORE, MD

FILED

*9 Sept 1929*



Charles Thomas, \*  
\*  
vs \* In the Circuit Court of Baltimore City.  
\*  
Edna Thomas, \*

To the Honoravle, the Judge of said Court.

The Answer to the Corss-Bill of Complaint by Charles Thomas, the defendant respectfully says:

1. That he admits the marriage, the number and names of the children, the place of residence of the the defendant mentioned in the cross-Bill of Complaint, but denjes all other alegation in said bill meterially effecting the alleged rights of the said defendant; that when this comes on for hearing it will be seen the defendant has no right to relief prayed for against him.
2. That having been granted leave to amend his Bill of Complaint, it will be there shown that the relief prayed for against this defendant will be granted absolute decree of a vinculo matri-  
monii from this defendant upon proper proof when reaxhed.

Having answered the said Corss-Bill of Complaint he prays to be dismissed with his costs.

And as in duty bound etc,

*G. P. Ruddle*  
-----  
Solicitor for complainant.

In the circuit Court

of  
Baltimore City

*B-496*  
*1924*  
*1926*

Charles Rhomas

vs

Edna Thomas

*B 31200*

*457*  
Answer to Petition for  
Alimony etc

Mr. Clerk, -  
Please file,

*G. L. Pendleton*  
Solicitor for Complainant

G. L. PENDLETON  
ATTORNEY-AT-LAW  
~~14 E. PLEASANT STREET~~  
BALTIMORE, MD.

*1227 Pennsylvania Ave*  
FILED *9 Sept 1929*

Charles Thomas, \*  
vs \*  
Edna Thomas, \*

In the Circuit Court of Baltimore City.

To the Honorable, the Judge of said Court:

The Answer to the petition for alimony etc respectfully says:

1. That he has been supporting his family at all times proper to have been done according to his station in life and further say, that he is not making any such money as stated in said petition, therefore he is discharging his full duty, according to his best ability and more than she deserves from him as will be seen and heard when this case comes for hearing.

Having answered said petition he prays to be dismissed with his costs.

And as in duty bound etc,

  
-----  
Solicitor for Respondent.

Serve on

Edna Thomas  
# 807 N. Calhoun  
St.

496-1926

in the Circuit Court

of

Baltimore City

Charles Thomas

vs

Edna Thomas

*(Order)*

Amended Bill of Complaint

B 31200

(18) (#) (16)

Mr. Clerk, Please file, and  
issue for the defendant and  
make writ returnable to next  
rule Day.

*G. L. Pendleton*  
Solicitor for Complainant.

G. L. PENDLETON  
ATTORNEY-AT-LAW  
14 E. PLEASANT STREET  
BALTIMORE, MD.

FILED

THE DAILY RECORD CO., BALTIMORE, MD.

Copy of the within Order of Court served  
on Edna Thomas on the 16<sup>th</sup> day of September 1929 in

Presence of James E. Keene  
of us  
John E. Potee  
Sheriff

16/9/29  
THE DAILY RECORD CO.  
EP 11 1829 3 1929

Charles Thomas, \*  
\*  
vs \* In the Circuit Court of Baltimore City.  
\*  
Edna Thomas, \*

To the Honorable, the Judge of said Court:

The Amended Bill of Complaint by an order of Court first had and obtained respectfully says:

1. That the parties to this cause were lawfully married about twelve years ago and lived together as husband and wife until on or about the 8th day of November 1926 when the separation took place as will be explained hereinafter.

2. That four children were born to the parties by reason of said marriage; that both parties are living in Baltimore City for a long time and residence of said city for more than two years next before this suit was filed.

3. That defendant Edna Thomas, his wife, is guilty of the crime of adultery with divers different men and places in Baltimore City, the particular names and places, are unknown to him, except one Murry Roberts, but that since the discovery thereof he has not condoned in anyway, which took place prior to the filing of this amended bill of complaint.

4. That the amended section of prayed to be made part of these proceedings as per amandment stated as follows:

That the defendant on divers times and different occasions, committed the crime of adultery with divers different men, their particular names and places thereof are unknown to him, except one Murry Roberts whose address is Baltimore City, but that since the discovery thereof he has not in anyway & condoned same, which took place since the filing of the original Bill of Complaint was filed hereof.

That he has filed no grounds in his original Bill of Complaint other than for a decree a mensa et thoro whereof he is advised entitled to a decree a vinculo matrimonii upon the grpund stated in the foregoing paragraph.

5. That the plaintiff owns a well furnished home at 807 N. Calhoun Street, Baltimore City, Maryland, on the first floor, a parlor set, on the second floor, bed room sets, and on the third floor, bed room sets which belongs to the plaintiff and other goods and chattles on each of said floors numerous in kind and pieces, the defendant his wife has made timely threats, to take and remove said furnature from the home No. 807 N. Calhoun Street to a different house and deprive him of same and place same in the possession of her friend, Murby Roberts, who has been fed by the defendant, such as meals from time to time which meals were required to be taken by his son whenever the defendant directed it, (meals) to be taken to him.

6. That plaintiff firmly believes and shows that the defendant has made up her mind to remove each piece of the furnature on the first, second and third floors of the home at No. 807 N. Calhoun Street Baltimore City, if not restrained by this Court and deprive him of the use of the said furnature in said house, for her comfort and to live with the said Murry Roberts; that the said four children are now attending school on Baltimore City, with the use of said furnature with the plaintiff, that he cannot purchase and provide other furnature to place same for the comforts of his said home with other and additional expense such as re-furnishing his home.

6. That there are irreconcilable differences exists between the parties as husband and wife that living together in the same house, but separately in said home the the occupancy is impossible at this time owing to the existance of the manner of living of the parties, while the plaintiff feels that he should not now fully disclose his domestice troubles, he is willing to do so if required to do so by the Court, he witholds same because of the four children whose tender years should be marked with respect by the plaintiff and not put such conditions exists in his home.

To the end, therefore the plaintiff will ever pray:

1. That the plaintiff will be divorced from the defendant, a vinculo matrimonii, the said Edna Thomas.
  2. That the custody of the said four minor children be given the plaintiff during the minority, of each.
  3. That the household goods now on the premises, on the first floor, second and third floors be given to plaintiff for the use of himself and said four children.
  4. That the defendant, Edna Thomas be restrained from removing any of the household goods now on the 1st, 2nd and 3rd floors in the house No. 897 N. Calhoun Street, Baltimore City, Maryland, by an order of this Court.
- AND such other and further relief as his case and equity shall require.

And may it please your Honor to grant unto him the writ of subpoena, directed to the said Edna Thomas, at No. 807 N. Calhoun Street, Baltimore City, Maryland, commanding her to be and appear in this Court on some certain day to be named therein and to appear and answer the Bill of Complaint in person, or by Solicitor, the said bill and to show good and sufficient cause, if any, she may have why the prayers of said bill should not be granted as therein prayed.

And as in duty bound etc,

  
G. P. Reed  
Solicitor for Complainant.

State of Maryland

SS : -

City of Baltimore

I hereby certify that on this <sup>the</sup> 4 day of September 1929, before me the subscriber a Notary Public of the State of Maryland in and for said city, personally appeared Charles Thomas and made oath in due form of law that the matters and things set out in the aforesaid are true to the best of his knowledge and belief.

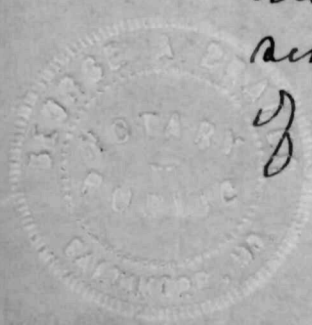
Witness my hand and Notarial Seal.

Caroline Murray  
Notary Public.

State of Maryland }  
City of Baltimore. } Sd.

I hereby certify that on this 11<sup>th</sup> day of  
September 1929 before me the subscriber a  
Notary Public of the State of Maryland  
in for said city personally appeared  
Charles Thomas and made oath in  
due form of law that the matters and things  
set out in the foregoing are true to the best  
of his knowledge and belief -  
Witness my hand and notarial Seal

George A. Hayes  
Notary Public





CHARLES THOMAS , \*  
\*  
VS \* IN THE CIRCUIT COURT OF BALTIMORE CITY.  
\*  
EDNA THOMAS, \*

Upon the foregoing Bill of Complaint and affidavit this 11<sup>th</sup> day of Sept., 1929, by the Circuit Court of Baltimore City, ordered and adjudged that Edna Thomas, her agents, and servants, be and each of them are hereby restrained and enjoined from any manner removing any of the household goods and chattles on either of the first floor, consisting parlor set, dining room, kitchen, on the second floor, consisting of a bed room set, library or other household goods and chattles, third floor, consisting of bed room furniture of any description pending these proceedings, provided a copy of this order be served upon Edna Thomas on or before the 16<sup>th</sup> day of Sept., 1929, unless cause to the contrary be shown on or before the 20<sup>th</sup> day of September, 1929,

*for her copy*

P 234

Ct. Ct.

B-496

19 26 Docket No.

Charles Thomas

vs.

Edna Thomas

**SUBPOENA TO ANSWER BILL OF COMPLAINT**

No. B-31200

(17)

Filed 14 Oct, 1929

G. L. Pendleton

SOLICITOR

13

Summonsed and a copy of the Process left  
with the dependant.

John E. Patee  
Sherriff

Des \$0.95

Keene

EP 11 1929 3 49 PM

EQUITY SUBPOENA

The State of Maryland

On Edna Thomas,  
807 N. Calhoun 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 October next cause an appearance to be entered for you and your answer to be filed to the amended bill of complaint of

Charles Thomas

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 SAMUEL K. DENNIS, Chief Judge of the Supreme Bench of Baltimore City, the 9th day of September 19 29  
Issued the 11th day of September, in the year 19 29

*Clark 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.

496  
1926

66 B

In the Circuit Court

-of-

Baltimore City

B 496  
1926

Charles Thomas

-vs-

Edna Thomas

Defendant's Answer to  
Amended Bill of Complaint.

B 31200

Mr. Clerk;  
Please file,

49

~~W. Asbie Hawkins~~  
Solicitor for Defendant.

HAWKINS & McMECHEN  
ATTORNEYS AND COUNSELLORS AT LAW  
14 E. PLEASANT STREET  
BALTIMORE, MD.

FILED 3 Oct 1929

Charles Thomas

: In the Circuit Court

:

:

-vs-

:

-of-

:

Edna Thomas

:

Baltimore City.

To the Honorable, the Judge of said Court:

The Answer of Edna Thomas, the defendant to the plaintiff's amended Bill of Complaint exhibited in this Court against her, respectfully says:

-First-

That she denies the allegation of her adultery with one Murray Roberts as alleged in the first paragraph thereof, and with divers other men mentioned therein, and that she has always borne herself as a faithful and devoted wife to her husband, Charles Thomas.

Having answered said amended Bill of Complaint as fully as she is advised is necessary, she asks to be hence dismissed with her bill of costs.

Edna Thomas  
Defendant.

N. Ashbie Hawkins  
Solicitor for Defendant.