

IN THE CIRCUIT COURT
OF
BALTIMORE CITY

396
1922

JOHN C. WELLING

VS.

CORNELIA G. WELLING

BILL OF COMPLAINT

Mr. Clerk:

Please file, etc.

R. E. Kanode
ATTORNEY FOR COMPLAINANT

24052

R. E. KANODE

ATTORNEY-AT-LAW

543 Calver
INCORPORATED BUILDING
BALTIMORE, MD
1922

JOHN C. WELLINGS * IN THE CIRCUIT COURT
VS. * OF
CORNELIA G. WELLINGS * BALTIMORE CITY
* * *

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator, complaining, says:

FIRST: That he was married to the defendant, Cornelia G. Wellings on or about the 24th day of June, 1910, at Baltimore County, State of Maryland, by Reverend Porter, a Minister of the Gospel.

SECOND: That your Orator and the said defendant, Cornelia G. Wellings, have been since their marriage aforesaid, and are now both residents of the State of Maryland.

THIRD: That although the conduct of your Orator towards the said Cornelia G. Wellings has always been kind, affectionate and above reproach, and although your Orator has always provided a suitable and proper home for his said wife, the said Cornelia G. Wellings has at various times, prior to the filing of this Bill of Complaint, committed the crime of adultery in Baltimore City with one Henry Roades.

FOURTH: That on or about the 29th day of April, 1922, your Orator discovered the adulteries of the said Cornelia G. Wellings and the said Henry Roades and your Orator shows that since his discovery of said adulteries he has not lived nor co-habited with the said Cornelia G. Wellings nor in any manner condoned her said adulteries.

FIFTH: That there have been two chil-

dren born of the marriage between your Orator and Cornelia G. Wellings, to wit: John C. Wellings, Jr., who is now nine years of age, and James Henry Wellings, who is now seven years of age. Said children are now in the custody of one Lillian Snowden, mother of the said Cornelia G. Wellings.

SIXTH: That the said Cornelia G. Wellings has since on or about the 21st day of ~~May~~^{June}, 1922, been residing in Baltimore City, in open adultery, with the said Henry Roades.

TO THE END THEREFORE:

(a) That your Orator may be divorced a vinculo matrimonii from the said Cornelia G. Wellings.

(b) That he may be decreed to have the custody and care of the said John C. Wellings, Jr. and James Henry Wellings, infant children of the parties to this cause.

And that he may have such other and further relief as his case may require, and to your Honor may seem proper.

And as in duty bound, etc.

R. E. Hanode
SOLICITOR FOR COMPLAINANT

John C. Wellings
COMPLAINANT

STATE OF MARYLAND }
BALTIMORE CITY } SS.

I hereby certify that on this ¹⁴ day of July, 1922, before me the subscriber, a Notary Public of the State of Maryland, in and for Baltimore City, aforesaid, personally appeared John C. Wellings, and made oath in due form of law, that the matters and facts set forth in the foregoing Bill of Complaint are true to the best of his knowledge, information and belief.

Witness my hand and notarial seal.

Lillian S. Sauer
NOTARY PUBLIC

May it please your Honor to grant unto your Orator the writ of subpoena, directed to the defendant, Cornelia G. Wellings, 1110 McCulloch Street, Baltimore, Md., commanding her to be and appear in this Court on some certain date, to be named in said writ, to show cause, if any she has, why the relief prayed for should not be granted.

R. E. Hanode
ATTORNEY FOR COMPLAINANT

538

396 B6 N Ct. Ct.

192 2

Docket No.

Helling
Helling Es
Prof B

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. 1110 McCallah
B 24052

Filed *Henry [Signature]* 192 2

R E / Kanode SOLICITOR

Summoned and a copy of the Process left with the defendant

Thomas F. McCallah Sheriff

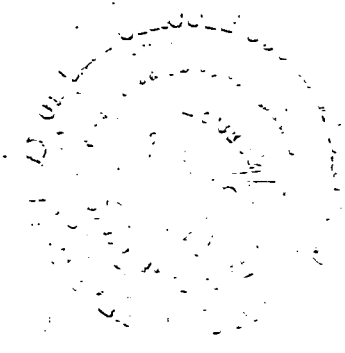
(Kelly) 7/20/22
Free \$0.80

EQUITY SUBPOENA

The State of Maryland

To

Cornelia G. Helling



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 **AUGUST** next cause an appearance to be entered for you and your answer to be filed to the complaint of

John C. Helling

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 **10th** day of **July** 192 **2**.

Issued the **18** day of **July**, in the year 192 **2**

CHAS R. WHITEFORD Clerk.

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11.)

B 394
IN THE CIRCUIT COURT
OF
BALTIMORE CITY

JOHN C. WELLING

VS.

CORNELIA G. WELLING

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

B 24052
(3)

J. Steward Davis
Solicitor for Respondent
215 St. Paul Place

DAVIS & BISHOP
ATTORNEYS AT LAW
BANNEKER BUILDING
14 E. PLEASANT STREET
BALTIMORE, MD.

Feb 24 July 1922

18/10/21/2

JOHN C. WELLING : IN THE CIRCUIT COURT
VS. : OF
CORNELIA G. WELLING : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Respondent answering the Bill of Complaint in the above case exhibited, says:-

FIRST: That she admits the allegations contained in the first paragraph of the Bill of Complaint.

SECOND: That she admits the allegations contained in the second paragraph of the Bill of Complaint.

THIRD: Your Respondentt denies with great emphasis the allegations as contained in the third paragraph of the Bill of Complaint.

FOURTH: Your respondent denies with great emphasis the allegations contained in the fourth paragraph of the Bill of Complaint.

FIFTH: Your respondent admits that John C. Welling and James Henry Welling are the children as result of the marriage between your respondent and John C. Welling. She denies however, that the children are in the custody of Lillian Snowden, the mother of your respondent.

SIXTH Your respodnent denies with great emphasis the allegations contained in the sixth paragraph of the Bill of Complaint.

SEVENTH: Your respondent further states that she is destitute and without funds to defray the expenses of this litigation; further that she is without the means of support for herself and children. She is advised by Counsel that she is permitted to petition this Honorable Court that the petitioner shall be compelled to contribute a reasonable amount as alimony pen dente lite towards the support of your respondent and her children and that she will also be awarded an amount in order to compensate her solicitor.

The Petitioner is employed as a chauffeur and received twenty-five (\$25.00) dollars weekly exclusive of his board and lodging.

() WHEREFORE your respondent prays:

(a) That the Bill of Complaint will be dismissed with costs to the petitioner.

(b) That she may retain the care and custody of John C. and James Henry Welling, infant children of the parties to this case.

(c) That this Honorable Court will decree that the petitioner pay a reasonable sum as alimony pen dente lite and an additional sum of counsel fee.

(d) Permanent alimony.



Solicitor for Respondent.

Miss Cornelia Welling
RESPONDENT.

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY that on this ²² day of July, in the year 1922, before me the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared Cornelia Welling and made oath in due form of law that the matters and facts set forth in the answer are true to the best of her knowledge and belief.

WITNESS my hand and Notarial Seal.

Helmer C. Fisher
Notary public

Docket B 396
1922

Circuit Court

John C. Welling
4201 Greenway, Guilford
vs.
Cornelia G. Welling

Order Counsel Fee and Alimony

Pendente Lite

No. B 24052

\$25-00 (4)
2 Children (5)

B
Fd 25" July 1922
" 21 19 Aug "

Now Est Thomas J. Mc Mulky

(2nd Return)
Copy of the within order of Court served on

John C. Welling on the 30th day of August 1922
in the presence of Harry W. Piley

4 w \$0.50

Thomas J. Mc Mulky.

Sheriff.

John C. Helling

vs.

Cornelia G. Helling

-IN THE-

CIRCUIT COURT

-OF-

BALTIMORE CITY

July

TERM

ORDERED BY THE COURT this 25th day of July 1922

that the Plaintiff

John C. Helling

pay to the Defendant

Cornelia G. Helling

the sum of

Twenty five

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

C. G. Helling

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

9th

day of August 1922, provided a copy of this Order be served on the said Plaintiff

John C. Helling on or before the

14th

day of August 1922

Charles F. Steen

TRUE COPY—TEST:

CLERK

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 21 day of August 192², that the time for showing cause under said Order be extended to the 6 day of September 192², and the time for service of a copy of the same be extended to the 31 day of August 192².

James M. Quibler

IN THE CIRCUIT COURT
OF
BALTIMORE CITY

B 396

1922

JOHN C. WELLING

vs.

CORNELIA G. WELLING

"ANSWER TO ORDER NISI"

B 24052

Mr. Clerk:

L

Please file, etc.,

R. E. Kanode

Attorney

R. E. KANODE

ATTORNEY-AT-LAW

543 Calvert Building

1120 FIDELITY BUILDING

BALTIMORE MD

1 Sept 1922

JOHN C. WELLING

-VS-

CORNELIA G. WELLING

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of John C. Welling to the Order Nisi for counsel fee and alimony, pendente lite, heretofore passed in this cause respectfully shows;

1st. He admits that he is employed as a chauffeur, and that he receives twenty-five dollars (\$25.00) a week in addition to his board and lodging.

This respondent further shows that he is unable to pay the sum of ten dollars (\$10.00) per week for the maintenance and support of his wife, and in addition to that sum, sufficient amount weekly to support and maintain his two children.

2nd. This respondent further shows that the said Cornelia G. Welling has deserted her children and is living apart from them, and your respondent was advised that the said Cornelia G. Welling is employed, and receives sufficient income to support and maintain herself.

WHEREFORE your respondent prays judgment of the Court whether he shall be required to comply with the said Order Nisi.

AND AS IN DUTY BOUND, etc.

John C. Welling
Respondent

W. E. Jarnde
Solicitor for Respondent

State of Maryland)
City of Baltimore) To Wit:

I HEREBY CERTIFY than on this...*31st*...day of
August... in the year One thousand nine hundred and
twenty-two, before the subscriber and Notary Public of
the State of Maryland, in and for Baltimore City, per-
sonally appeared John C. Welling, and made oath in due
form of law that the matters and facts set forth in the
foregoing answer are true to the best of his knowledge,
information and belief.

WITNESS my hand and Notarial Seal

Rebecca Cohen
Notary Public

R. E. Kanode

396 B62
19 22 No.

Ct. Ct.
Docket.

Wedding

vs.

Cornelia Wedding

MOTION FOR HEARING

R

No. 240525

7

J. S. Davis

Filed 6 day of Sept 1922

Welling

vs.

Cornelia Welling

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The defendant

by

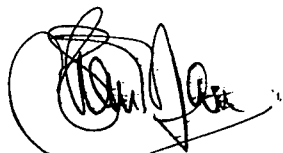
J. Stewart Davis

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

Calendar for hearing

alimony & counsel fee

in conformity with the First Equity Rule.



Solicitor for

defendant

Serve on
R.E.Kanode

396 Ct. Ct.
1922 B No. 62 Docket

Welling

vs.

Welling

NOTICE OF HEARING

B No. 24012

Filed No. 7 day of Sept 1922

Copy of the within Notice served on R.E. Kanode
Solicitor on the 8th day of September 1922 in
presence of Harry B. Brown Thomas F. M. Maulty
Fees \$0.50 Sheriff

Welling

vs.

Cornelia Welling

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

when reached in due course on said Calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court

IN THE CIRCUIT COURT
OF
BALTIMORE CITY

396
R. E. Kanode

JOHN C. WELLING

vs.

CORNELIA G. WELLING

"ORDER TO ENTER CASE
DISMISSED"

MR. CLERK:
PLEASE FILE, etc.,

B 24052
R. E. Kanode
Attorney for Complainant

R. E. KANODE

ATTORNEY-AT-LAW
543 Calvert Bldg.
- 12th FIDELITY BUILDING -
BALTIMORE, MD.

Ed 11 Sept 1922

JOHN C. WELLING

vs.

CORNELIA G. WELLING

IN THE CIRCUIT COURT

of

BALTIMORE CITY

Mr. Clerk:-

Please enter the above entitled case dismissed.



Attorney for Complainant

IN THE CIRCUIT COURT

OF

BALTIMORE CITY

602 B 396
JOHN C. WELLING

1922

vs.

CORNELIA G. WELLING,

"PETITION & ORDER FOR
DISMISSAL"

Mr. Clerk:

Please file, etc.,

B 24052
R. E. Kanode

Solicitor for Petitioner.

R. E. KANODE

ATTORNEY AND COUNSELLOR AT LAW
SUITE 543-553 CALVERT BUILDING
BALTIMORE, MD.

FILED

10 Jan 1923.

JOHN C. WELLING; : IN THE CIRCUIT COURT
:
vs. : of
:
CORNELIA G. WELLING : BALTIMORE CITY

THE petition of John C. Welling, the plaintiff in the above cause respectfully shows unto your Honor:

1. That he heretofore filed in this cause his bill of complaint praying for a divorce a vinculo matrimonii from his wife, Cornelia G. Welling, believeing at that time that the said Cornelia G. Welling was a resident of the city of Baltimore.

2. That your petitioner after the filing of the said bill of complaint learned that the said Cornelia G. Welling was a resident of Baltimore County, State of Maryland, and he thereupon, through his counsel, filed in this cause an order dismissing the suit filed by him in this Honorable Court and paid the costs thereof, and thereupon filed his bill of complaint in the Circuit Court for Baltimore County.

3. That your petitioner was not aware at the time he had the suit in this court dismissed, that it was necessary to first obtain leave of court before doing so.

TO THE END THEREFORE,

That your Honor may pass an order, nunc pro tunc as of the eleventh day of September 1922 permitting your petitioner to dismiss the above entitled suit.

AND AS IN DUTY BOUND, etc.,

John C. Welling

