

IN THE CIRCUIT COURT OF

64 BALTIMORE CITY

B 590

MILFORD WILSON

1924

vs.

MARGARET WILSON

BILL OF COMPLAINT

Mr. Clerk:-
Please file, etc.

Louis Hollander
Solicitor for Complainant.

B 27 507
(17)

LOUIS HOLLANDER
ATTORNEY AT LAW
BALTIMORE, MARYLAND

FILED

26 August 1924

May it please Your Honor to grant unto Your Orator the writ of subpoena directed against the said Defendant, Margaret Wilson, commanding her to be and appear in this Court on or before some certain day to be named therein to do, perform and abide by any Decree that may be passed in the premises.

AND AS IN DUTY BOUND, etc.

Milford Wilson

Louis Holland
Solicitor for Complainant.

STATE OF MARYLAND, CITY OF BALTIMORE, to wit,

I Hereby Certify, That on this 21st day of August, in the year One Thousand Nine Hundred and Twenty Four, before me, a Notary Public of the State of Maryland, in and for Baltimore City aforesaid, personally appeared Milford Wilson, the herein Complainant, and made oath in due form of law that the matters and facts herein set forth are true to the best of her knowledge, information and belief.

AS WITNESS my hand and Notarial Seal.

Charles J. Harris
Notary Public.

P335

590
1924 *B* Docket No. *64* Ct. Ct.

Wilson
- vs -
Wilson

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. *Pw*
B-27507

76262
12
Filed *11 Sept* 192*4*

Louis Hollander SOLICITOR

B

*Summoned " and a copy of the Process left with
the defendant
John E. Potee
Sheriff
Dues \$0.80
(Bucks
(9/10/24)*

EQUITY SUBPOENA

The State of Maryland

To

Margaret Wilson

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

September
Milford Wilson

against you exhibited in the Circuit Court of Baltimore City,

HEREOF fail not, as you will answer the contrary at your peril.

WITNESS, the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the

Issued the

14th
26th

day of

July 1924
August in the year 1924

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.

CIRCUIT COURT

19 *24* Docket No. *64B-590*

Mulford Wilson
vs.

Margaret Wilson

ORDER OF APPEARANCE

B-27507

Mr. Clerk

Please File *13*

Chas. A. Turner
Sol. for defendant

No. _____

Filed *9* day of *Sept* 19*24*

Milford Wilson

vs.

Margaret Wilson

Mr. WHITEFORD, Clerk.

64 B-590

IN THE

Circuit Court

OF

BALTIMORE CITY

September Term, 1924

Enter my appearance for Defendant

Chas. G. Turner

Solicitor

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

WB 590
MILFORD WILSON *1924*

VS.

MARGARET WILSON

A N S W E R.

B
Mr. Clerk: *27504*

Please file etc. *(4)*

Chas. G. Turner
Solicitor for defendant

fd 20 Sept 1924

CHARLES G. TURNER
ATTORNEY AT LAW
~~TITLE ANNEX~~ MURPHY BUILDING, BALTIMORE
PHONE CALVERT 3478
PLAZA 3140

MILFORD WILSON
VS.
MARGARET WILSON

IN THE
CIRCUIT COURT
OF BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of the defendant, Margaret Wilson, to the Bill of Complaint heretofore filed against her in the above entitled case, respectfully shows unto your Honor as follows:

1st. That the defendant admits the marriage as set out in the first paragraph of said Bill of Complaint:

2nd. That this defendant denies the allegation, set out in the second paragraph of said Bill of Complaint, that there are no children as the result of said marriage and avers that there is one child as the result of said marriage, Margaret Elizabeth Wilson, now six years old.

3rd. That this defendant denies that the plaintiff has always been to her a good, true and dutiful husband and denies that she, during the month of October, 1918, or at any other time, committed the crime of adultery as set forth in the third paragraph of said Bill of Complaint, and avers that she has always been a faithful and chaste wife towards the plaintiff.

4th. That the plaintiff abused, abandoned and deserted this defendant in July 1918 without any just cause, provocation, or reason therefore and avers that the plaintiff has been living in adultery at Baltimore City, Maryland, with a woman whose name can and will be furnished, if necessary.

Having answered as fully as she is advised, this defendant prays that said Bill of Complaint be dismissed.

As in duty bound, etc..

Chas E Turner
Solicitor for defendant

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

CPD 590
MILFORD WILSON
1924

VS.

MARGARET WILSON

P E T I T I O N .

Mr Clerk:

B 27509
Please file, etc.

(5)
Chas G Turner
Solicitor for defendant.

~~*B 27509*~~
~~*(5)*~~

Chas G Turner
Solicitor for defendant
1924
PHONE. CALVERT 3813X
Plaza 3140

MILFORD WILSON

VS.

MARGARET WILSON

IN THE

CIRCUIT COURT
OF

BALTIMORE CITY

TO THE HONORABLE: THE JUDGE OF SAID COURT:

The petition of the defendant, Margaret Wilson, respectfully shows unto your Honor, as follows:

1st.-That heretofore the plaintiff filed a Bill of Complaint in the above entitled case, charging the defendant with having deserted him and praying for a divorce *A Vinculo Matremonii*.

2nd.-That this defendant filed an answer to said Bill of Complaint denying that she had or has deserted the plaintiff, and alleging that the plaintiff deserted the defendant and has been living in adultery with a woman whose name can and will be furnished, if necessary.


3rd.-That the plaintiff is employed by a person unknown to the defendant, that he is a teamster and earns wages of 25.00 dollars per week, whilst this defendant has no means of support other than 5.00 dollars per week wages which she is able to earn through her employment as a domestic, nor is she able to pay her solicitor a fee for his services herein.

Wherefore this defendant prays:

1st.-That she be awarded alimony pendente lite, as well as permanently thereafter, as well as a reasonable sum, as counsel fee, for her solicitor of record herein.

2nd.-And for such other and further relief as to your Honor in the premises may seem meet and just.

As in duty bound, etc.


Solicitor for defendant.

CIRCUIT COURT

590
1924

Docket No. 64 B

Louis Hallanda

Serve on

Charles G. Turner

11 E Lexington St
3rd floor

Milford Wilson
VS.

Margaret Wilson

1 copy

PETITION AND ORDER TO
TAKE TESTIMONY UN-
DER 30th RULE

P 27507
No. (9)

Fd. 3 Dec 19 24
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non eat
John E. Potter
Sheuff

(Hecht)

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Lille
13

~~Foster~~
Charles G. Turner

Milford Wilson

VS.

Margaret Wilson

IN THE
Circuit Court
OF
BALTIMORE CITY

To the Honorable the Judge of the
Circuit Court 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 therefor prays your Honor to pass an order, according to the Statutes for such case made and provided.

And as in duty bound will ever pray.

Louis Hollander
Solicitor for Plaintiff.

Upon the foregoing Petition and Application it is this *3rd* day of *December*
A. D., 19*24*, 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 *her*
Solicitor, on or before the *14* day of *December* 19*24*

Charles F. Stein

CIRCUIT COURT

19

Docket No.

VS.

PETITION AND ORDER TO
TAKE TESTIMONY UN-
DER 30th RULE

No.

Fd. 19

MILFORD WILSON

VS.

MARGARET WILSON

IN THE
Circuit Court
OF
BALTIMORE CITY

To the Honorable the Judge of the
Circuit Court 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 therefor prays your Honor to pass an order, according to the Statutes for such case made and provided.

And as in duty bound will ever pray.

Louis Hollander
Solicitor for Plaintiff.

Upon the foregoing Petition and Application it is this 3rd day of December
A. D., 1924, 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 14th day of December 1924

Charles F. Stein

True Copy Test

Chas R Whiteford Clerk

64-B Docket 590
1924

Circuit Court

Milford Wilson
P 3140 vs. 11 20

Margaret Wilson

Order Counsel Fee and Alimony

Pendente Lite

Chas B Turner

No. _____

B-27507

(6) (7)
(8)

Ad. S. Sept 1924

Non Est
John E. Potee Sheriff

John E. Potee Sheriff

John E. Potee Sheriff

(2nd Return) Non Est

(3rd Return) Non Est

—IN THE—

CIRCUIT COURT

—OF—

BALTIMORE CITY

TERM

Milford Wilson

vs.

Margaret Wilson

September

ORDERED BY THE COURT this 18 day of September 1924

that the Plaintiff Milford Wilson

pay to the Defendant Margaret Wilson

the sum of Twenty Five Dollars as Counsel Fee for the

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

Dollars per week, during the continuance of this suit, to the said Defendant Margaret Wilson

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 3

day of October 1924, provided a copy of this Order be served on the said Plaintiff

Milford Wilson on or before the 3

day of Sept 1924 Charles F. Stew

Chas F. Stew

TRUE COPY—TEST:

CLERK

\$ 50 a week
1 clud

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 20 day of October 1924, that the time for showing cause under said Order be extended to the 3 day of November 1924, and the time for service of a copy of the same be extended to the 30 day of October 1924.

Charles J. Stein

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 ~~14th~~ day of *Nov* 192~~4~~, that the time for showing cause under said Order be extended to the *24* day of *Nov* 192~~4~~, and the time for service of a copy of the same be extended to the *19* day of *Nov* 192~~4~~

Charles E. Stur

SAPPINGTON AND MORFIT

ATTORNEYS AT LAW

733-745 TITLE BUILDING

S. W. COR. ST. PAUL AND LEXINGTON STREETS

BALTIMORE, MD.



Bone 203

Charles G. Turner, Esq.,

305 Title Annex Building,

City.



Wilson & Wilson

Docket.....

192.....

Milford Nelson

vs.

Margaret Nelson

In the Circuit Court

OF BALTIMORE CITY

Charles G. Turner,

Esq.

DEAR SIR:

You are hereby notified that the subscriber will attend at the office of.....

Messrs Davis & Evans - 215 St Paul Place,

in the City of Baltimore, for the purpose of taking testimony in the above cause on Monday

the 14th day of December A. D. 1925 at 1 o'clock

P. M.

WITNESS my hand this 9th day of December A. D. 1925

A. DER. SAPPINGTON,

Examiner,

733-745 TITLE BUILDING,

S. W. Cor. St. Paul and Lexington Sts.

Docket.....

Circuit Court

VS.

Order Counsel Fee and Alimony

Pendente Lite

No.

Milford Wilson
VS.
Margaret Wilson

—IN THE—
CIRCUIT COURT
—OF—
BALTIMORE CITY

September TERM

ORDERED BY THE COURT this 18th day of September 1924

that the Plaintiff Milford Wilson

pay to the Defendant Margaret Wilson

the sum of Fifty ⁰⁰/₁₀₀ Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of Twenty ⁰⁰/₁₀₀ -

Dollars per week, during the continuance of this suit, to the said Defendant Margaret Wilson

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 19th

day of October 1924, provided a copy of this Order be served on the said Plaintiff

Milford Wilson on or before the 30th

day of Sept 1924

Charles F. Stein

TRUE COPY—TEST:

Chas R. Whitford
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 20 day of October 1924, that the time for showing cause under said Order be extended to the 3 day of November 1924, and the time for service of a copy of the same be extended to the 30 day of October 1924.

Wm. C. Melby
Charles F. Stein
Clas R. Mulford

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 13 day of Nov 1924, that the time for showing cause under said Order be extended to the 24 day of Nov 1924, and the time for service of a copy of the same be extended to the 19 day of Nov 1924.

Chas R. Whiteford

Charles F. Stein

TRUE COPY
TEST.

3/13/1891

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

B590

1924
MILFORD WILSON

VS.

MARGARET WILSON

order of appearance
slpp

Mr. Clerk:-

Please file.

B 27507

(10) (11)

Davis & Evans

ATTORNEYS

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE
BALTIMORE, MD.

Ad 23rd Oct 1925

MILFORD WILSON : IN THE CIRCUIT COHRT

VS. : OF

MARGARET WILSON : BALTIMORE CITY.

Mr.Clerk:-

Please strike out my appearance as attorney for the
plaintiff in the above entitled case.


ATTORNEY

Mr.Clerk:-

Please enter our appearance for plaintiff in the above
entitled cause.


ATTORNEYS

IN THE CIRCUIT COURT

BALTIMORE CITY

590-973
1924 64B

MILFORD WILSON

VS.

MARGARET WILSON

PETITION & ORDER THEREON

1327507

Mr. Clerk: - (12)
Please file.

Davis & Evans
ATTORNEYS FOR PETITIONER

Sapp

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE
BALTIMORE, MD.

5d 29 Oct 1925

MILFORD WILSON : IN THE CIRCUIT COURT

VS. : OF

MARGARET WILSON : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The petition of Milford Wilson, complainant in the above entitled cause respectfully says:

That on or about the 30th day of Dec, 1924 an order was passed by this Honorable Court granting the petitioner the right to take testimony under the 30th Equity Rule.

That your petitioner desires to have that order rescinded that he may be permitted to take testimony under the 43rd Equity Rule.

WHEREFORE your petitioner prays:

- I. That an order be passed rescinding the order to take testimony under the 30th Rule.
2. That leave be granted to take testimony before one of the standing Exaimners of this Court.

Davis Evans

SOLICITORS FOR COMPLAINANT.

Ordered this 29th day of *October* 1925 that the order to take testimony under 30th Rule be and is hereby rescinded. It is further ordered that leave be granted to the parties to the cause to take testimony as prayed before one of the standing Examiners of this Court.

James P. Gorter