

actions. Apparently the distinction was bordering on obsolescence in 1834 when the Court of Appeals stated that the distinction between local and transitory actions apparently still existed. See Patterson v. Wilson, 6 G&J 499 (1834) and recently cited in Superior Construction Co. v. Elmo, 204 Md. 1 (1954).

Originally, whether or not an action was local determined the venue and forms of pleading. If objection to improper venue is not raised, it is cured by the decree. See Superior Construction Co., *supra*.

Rules 301, 340, and 370 have modernized the forms of pleading so that an action is now commenced by either a Bill of Complaint or a Declaration, rather than capias ad respondendum or satisfaciendum, and neither the replevin nor the ejectment rules require that venue be specially pleaded as is normally required in local actions. See 16 & 17 Charles II Ch. 8, note. The special local action venue requirements have in effect been abolished with respect to replevin and ejectment, and to some extent trespass q.c.f. (see Rules BQ40, T41, and Art. 75, §79 respectively).

SEC. 6-202. ADDITIONAL VENUE PERMITTED.

IN ADDITION TO THE VENUE PROVIDED IN §§ 6-201 OR 6-203, THE FOLLOWING ACTIONS MAY BE BROUGHT IN THE INDICATED COUNTY:

- (1) DIVORCE - WHERE THE PLAINTIFF RESIDES;
- (2) ANNULMENT - WHERE THE PLAINTIFF RESIDES OR WHERE THE MARRIAGE CEREMONY WAS PERFORMED;
- (3) ACTION AGAINST A CORPORATION WHICH HAS NO PRINCIPAL PLACE OF BUSINESS IN THE STATE - WHERE THE PLAINTIFF RESIDES;
- (4) REPLEVIN OR DETINUE - WHERE THE PROPERTY SOUGHT TO BE RECOVERED IS LOCATED;
- (5) ACTION RELATING TO CUSTODY, GUARDIANSHIP, MAINTENANCE, OR SUPPORT OF A CHILD -