

IN THE
CIRCUIT COURT OF
BALTIMORE CITY

*B 44
1936*

OPHELIA D. GARCIA

VS.

J. FRANK GARCIA

*B 41207
(1)*

BILL OF COMPLAINT

MR. CLERK: PLEASE FILE

Thurgood Marshall

THURGOOD MARSHALL
ATTORNEY AT LAW
604 PHOENIX BUILDING
BALTIMORE, MD.

FILED

27 January 1936

OPHELIA D. GARCIA

vs.

J. FRANK GARCIA

:
:
:
:
:

IN THE
CIRCUIT COURT OF
BALTIMORE CITY

To the Honorable, the Judge of said Court:

The bill of complaint of your Complainant respectfully represents unto your Honor as follows:

1. That your Complainant was legally married to the Defendant on the thirteenth day of March, 1929 at Philadelphia, Pa.
2. That both the Complainant and the Defendant reside in Baltimore City and have been residents of the State of Maryland for more than two years last past.
3. That no children were born as a result of said marriage.
4. That the conduct of your Complainant towards her husband has always been kind, affectionate and above reproach.
5. That on or about July, 1931 the Defendant, without just cause or provocation, deserted and abandoned your Complainant; that said abandonment has continued uninterruptedly since that date, was the Defendant's own deliberate and final act, and is beyond any reasonable hope or expectation of a reconciliation.

WHEREFORE your Complainant prays:

1. That your Complainant may be divorced a vinculo matrimonii from the Defendant.
2. That your Complainant may be awarded a reasonable sum as counsel fee for her solicitor of record.
3. That your Complainant may have such other and further relief as the nature of her cause may require.

May it please your Honor to grant to your Complainant the writ of subpoena directed to the Defendant, J. Frank Garcia, residing at 1006 Madison Avenue in Baltimore City, commanding him to be and appear in this Honorable Court on or before some certain day named therein, to answer the premises and abide by and perform any decree that may be passed therein.

Thurgood Marshall
Solicitor for Complainant

B44/1936
IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

B 44
1936

OPHELIA D. GARCIA

vs.

B 41207
(3)

J. FRANK GARCIA

ANSWER TO BILL OF COMPLAINT

Mr. Clerk:

Please file, etc.

Miracle Jones
Attorneys for Defendant

BRISCOE & JONES

209 UNION TRUST BUILDING

BALTIMORE, MD.

FD 8 February 1936.

OPHELIA D. GARCIA

:

IN THE

vs.

:

CIRCUIT COURT

J. FRANK GARCIA

:

OF BALTIMORE CITY
B44/1936

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Defendant for answer to the Bill of Complaint
in the above entitled case respectfully shows unto your Honor:

1. That he admits the allegations of paragraphs two and
three but denies the allegations of paragraphs one, four and five
and calls on the Plaintiff for strict proof thereof.

J. Frank Garcia
Respondent

Wiseau Jones
Attorneys for Defendant

CIRCUIT COURT

46-B p.44
1936

Docket No.

Ophelia D. Garcia
VS.

J. Frank Garcia

41

PETITION AND ORDER TO TAKE TESTIMONY UNDER 30th RULE

B No. 41207
(4)

Fd. 18 February 1936

.....
Ophelia D. Garcia
.....
VS.
.....
J. Frank Garcia
.....

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 therefore 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.

.....
Thurgood Marshall
.....
Solicitor for Plaintiff.

Upon the foregoing Petition and Application it is this *18th* day of *February*,
A. D. 19 *36*, 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 *28th* day of *February*, 19 *36*

C. J. Smith
✓

Copy of the Within Petition and Order of Court served on Briscoe
and Jones Solicitors on the 21st day of February 1936 in Presence of
Robert W Wyatt

Joseph C Deegan
Sheriff

Geo P. N

Thurgood Marshall

service admitted 2/21/36

Briscoe & Jones



Delivered on

Briscoe & Jones

209 Union Trust

IN THE
CIRCUIT COURT OF
BALTIMORE CITY

B44
1936

OPHELIA D. GARCIA

VS.

J. FRANK GARCIA

B41207

DECREE (10)
DIVORCE A VINCULO MATRIMONII

Mr Clerk:

Please file, etc.

Thurgood Marshall
Thurgood Marshall.

THURGOOD MARSHALL
ATTORNEY AT LAW
PHOENIX BUILDING
4 E. REDWOOD STREET
BALTIMORE, MD.

FILED

August 1936

Ophelia D. Garcia

Vs.

J. Frank Garcia

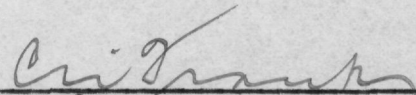
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In the
Circuit Court of
Baltimore City

This cause standing ready for hearing and testimony taken and counsel for the respective parties were heard, and the proceedings considered

It is thereupon, this first day of August, 1936, by the Circuit Court of Baltimore City, adjudged, ordered and decreed that the above named plaintiff, Ophelia D. Garcia, be, and she is hereby, divorced a vinculo matrimonii from the defendant, J. Frank Garcia.

And it is further ordered that the said plaintiff, Ophelia D. Garcia, pay the costs of these proceedings.



Judge.

P 607

CIRCUIT COURT

B-44

19 36

No.

Docket

Ophelia D. Garcia

vs.

J. Frank Garcia

*1006 Madison
and*

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pd + Bk

No. B- 41207

(2)

Filed *30 Jan* 1936

Thurgood Marshall

Solicitor

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EQUITY SUBPOENA

The State of Maryland

To J. Frank Garcia,
1006 Madison Avenue
B-44-1936



CIRCUIT COURT

No. 1936
Docket

J. Frank Garcia

1006 Madison Ave

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B-44-1936

30 Jan 36

John Good (relator)

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

Ophelia D. Garcia

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 13th day of January, 1936
Issued the 27th day of January, in the year 1936

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.

Summoned J. Frank Garcia and a copy
of the Process with a copy of the Bill of Complaint
served on the Defendant on the 27th day of
January 1936 in Presence of August J. Beeby

Joseph C. Beegans
Sheriff

Geo. H. 70

1. [Name], the Honorable SAULTER K. DENNIS, Chief Judge of the Supreme Bench of Baltimore

City, Md.

13th

day of

January

1936

Issued the

27th

B-VI-1936

January

in the year 1936

1006 Madison Avenue

On

J. Frank Gerold's

The State of Maryland

EQUITY SUBPOENA

Equity Rules 11

