

IN THE
CIRCUIT COURT OF
BALTIMORE CITY

*B 142
1936*

MARIE E. JONES

VS

LAWRENCE S. JONES

*B 41403
D.*

BILL OF COMPLAINT

MR. CLERK: PLEASE FILE.

Thurgood Marshall
SOLICITOR FOR COMPLAINANT

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

FILED

16 March 1936

MARIE E. JONES
vs
LAWRENCE S. JONES

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IN THE
CIRCUIT COURT OF
BALTIMORE CITY

To the Honorable, the Judge of said Court:

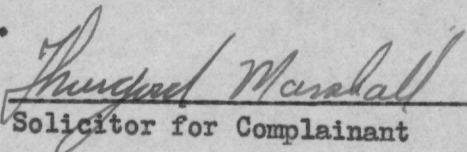
The bill of complaint of your Complainant respectfully represents unto your Honor as follows:

1. That your Complainant was legally married to the Defendant on the twenty-seventh day of February, 1929 by an ordained minister of the Gospel, at Baltimore, Maryland.
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 August, 1929 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, Lawrence S. Jones, residing at 1511 Laurens Street 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.


Solicitor for Complainant

AND AS IN DUTY BOUND, etc.

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CIRCUIT COURT

B-142

19 36	No.	Docket
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Marie E. Jones

vs.

Lawrence S. Jones

1511 Lamers St

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pro. B. de

No. B 41403
(2)

Filed *26th March* 19*36*

Thurgood Marshall

Solicitor

14

EQUITY SUBPOENA

The State of Maryland

On Lawrence S. Jones,
1511 Laurens Street
B-142-1936



CIRCUIT COURT

B-142

1511 Laurens Street
Lawrence S. Jones
12-11-36

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B-142-1936

(S)

Filed March 1936

John Good Marquis

Solicitor

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

Marie E. Jones

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 **March**, 19 **36**
Issued the **16th** day of **March**, in the year 19 **36**

Clas 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 Lawrence S. Jones and a copy of the
Process with a copy of the Bill of Complaint
served on the Defendant, on the 23^d day of
March 1936, in Presence of Harry Maff

Joseph C. Heegan
Sheriff.

Geo H/20

WITNESS, the Honorable SAMUEL N. DENNIS, Chief Justice of the Supreme Court of the State of Maryland

City, the

9th

B-JVS-1222

day of

March

Issued the

16th

day of

March

, in the year 19

1936

On Lawrence S. Jones,

The State of Maryland

MEMORANDUM: You are required to file your answer or other defenses in the City of Baltimore, within fifteen days after receipt of this memorandum.

General Equity Rules 14

