

317-294

IN THE CIRCUIT COURT OF

BALTIMORE CITY

B 215
1926

LILLA MAY MEEKINS

VS.

JACOB MEEKINS

B 30678
17 27

BILL FOR DIVORCE

and Order of Publication

Mr. Clerk:-

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF.

DAVIS & EVANS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

Filed 15 May 1926

BAUMGARTEN & CO., INC.

LILLA MAY MEEKINS : IN THE CIRCUIT COURT

VS. : OF

JACOB MEEKINS : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, Jacob Meekins, on the 5th day of August, 1921 in Baltimore City, and with whom she resided until the 9th day of April, 1926.
2. That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said Jacob Meekins.
3. That the said Jacob Meekins has on divers days and times since said marriage committed the crime of adultery with divers, lewd and abandoned women, whose names are unknown to your Oratrix, and said offense has not been condoned by your Oratrix.
4. That your Oratrix has not lived or co-habited with the said defendant since she discovered his said adulteries.
5. That there are no children born as issue of said marriage.
6. That your Oratrix is a resident of the State of Maryland having resided in Baltimore City for more than three years prior to the filing of this Bill of Complaint, but that the defendant is a nonresident of the State of Maryland and when last heard of was in Chester Pennsylvania.

DAVIS & EVANS, SOLICITORS
215 ST. PAUL PLACE
IN THE CIRCUIT COURT OF BALTIMORE CITY
LILLA MAY MEEKINS VS. JACOB MEEKINS
ORDER OF PUBLICATION

The object of this bill is to procure a divorce a Vinculo Matrimonii by the plaintiff, Lilla May Meekins from the defendant, Jacob Meekins.

The bill recites that the parties were married on the 5th day of August, 1921 and lived together until the 9th day of April, 1926. That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said Jacob Meekins. That the said Jacob Meekins has on divers days and times since ^{said} marriage committed the crime of adultery with divers, lewd and abandoned women, whose names are unknown to your Oratrix and said offense has not been condoned by your Oratrix. That your Oratrix has not lived or co-habited with said defendant since she discovered said adulteries. That there are no children born as result of said marriage. That your Oratrix is a citizen of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this Bill but that the defendant is a non-resident of the State of Maryland and when last heard of was in Chester, Pennsylvania.

IT is thereupon ordered by the Circuit Court of Baltimore City this ¹⁵ day of ^{May} 1926 that the plaintiff by causing a copy of this order to be inserted in some daily newspaper published in Baltimore City once a week for four successive weeks before the ¹⁶ day of ^{June} 1926, give notice to the absent defendant of the object and substance of this bill, warning him to be and appear in this Court in person or by Solicitor on or before the ² day of ^{July} 1926 to show cause, if any he may have, why a decree should not be passed as prayed.

E. Evans

TO THE END, THEREFORE:

(a) That your Oratrix may be divorced A Vinculo Matrimonii from the said Jacob Meekins.

(b) That she may have such other and further relief as her case may require.

May it please your Honor to grant unto your Oratrix the Order of Publication directed against the said Jacob Meekins, a non-resident of the State of Maryland, commanding and requiring him to be and appear in this Court on some day certain to be named therein to answer the premises and abide by and perform such decree or order as may be passed therein.

AND as in duty bound, etc.



ATTORNEYS FOR PLAINTIFF.