3/18/13/20

IN THE CIRCUIT COURT NO. 2 BALTIMORE CITY.

Martha E. Smith

vs.

Charles Smith 1523 Barchay M.

Bill for divorce, A VINCULO MATRIMONII.

Mr. Clerk: ____ / 2 /3

Sol. for Plaintiff

215 St. Paul Pla.

Please file &c.,

Martha E. Smith	*	
VS.	*	IN THE CIRCUIT COURT NO. 2
Charles A. Smith		BALTIMORE CITY.
	<u>ا</u> د	

25

TO THE HONORABLE. THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully says: FIRST: That the parties hereto were married in Baltimore City, State of Maryland, on or about the 25th day of August 1915, and lived together as man and wife until on or about the 25th day of May 1917.

SECOND: That vboth parties are residents of Baltimore City, State of Maryland, and have been for more than two years prior to the filing of this Bill of Complaint.

THIRD: That though the conduct of your Oratrix, towards her said husband, has been kind, affectionate, and above reproach, he without any just cause or reason, abandoned and deserted her, and has declared his intentions to live with her no more; that such abandonment has continued uninterruptedly for more than three years, was deliberate and final, and the separation of the parties is beyond any reasonable hope or expectation of a reconciliation.

FOURTH: That there are no children as the result of said marriage.

WHEREFORE YOUR ORATRIX PRAYS:

- -a- A divorce, A Vinculo Matrimonii, from the defendant.
- -b- That she may be allowed to resume her maiden name, Martha Tinsley.
- -C- Such other and further relief as the case may require.

May it please your Honor, to grant unto your Oratrix, the writ of subpoena, directed unto the said defendant, commanding him to be and appear in this Court, in person or solicitor, on some day certain to be named therein, and perform such decree, as may be passed in the premises.

As in duty bound, she will ever pray,

fo Plaintiff. sol.

63 Ct. Ct. No. 2 ;-*; ; · *; <u>362</u> 1920 B Docket No. 29 Imute vs. /Im eth Subpoena to Answer Bill of Complaint 19402 No..... 2 Сориу cop Ear. J. Filed 12" 192 gur Solicitor.

EQUITY SUBPOENA The State of Maryland

To varl.

of Baltimore City, Greeting:

.....

WE COMMAND AND ENJOIN YOU,	That all excuses set aside, you be in your person before
	t the Court House in said city, on the second Monday of
July , 1920, 1	to answer the complaint of
Martha	E Smith "
<u>.</u>	
HEREOF fail not, as you will answer to the o	against you in said Court exhibited: contrary at your peril:
	SOPER. Chief Judge of the Supreme Bench of Baltimore
City, the day of	
Issued the /O' day of	July, in the year 192 0
	1 Votus Reasourts
	Clerk.
NOTICE TO THE PERSON SUMMONED:	()

"Personal attendance in Court on the day named in the above Writ is not required; but unless within such number of days thereafter as the law limits, legal defense is made to the above mentioned suit a judgment by default may be entered against you."

"The Defendant is required to file his Answer or other Defense in the Clerk's Office within fifteen days after the return day."

Ct. Ct. No. 2 ••; Docket No. 192 1- 14 VS. \$ 12 Subpoena to Answer Bill of Complaint No. \mathcal{O} 721 Filed... ..., 192 т. . Д. т Solicitor.

; :

 \mathcal{D}'

;.

,

EQUITY SUBPOENA The State of Maryland

To

Charles a Smith

	(20) S										
	1				1911						
	4.20										
	1.24										
	121116										
************									*******************************		
					1 1						
								12.			
*************		1									
		1		-		2.1					
	C. S. S. A.										

and the second	23		1. 1. 1.								
1 3	5.		10000								
			•••••	••••••					*****		·····,
	4										
63	5				1 1 1						
***************		***************************************	***************************************								
Sectored 1					1. 2 . 2						
		······									
. Ke					11111						
·											
120 M ()											
				and a start							
				120			***********************			***********************	************
************			******								

of Baltimore City, Greeting:

lagar

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you be in your person before the Circuit Court No.2 of Baltimore City, at the Court House in said city, on the second Monday of , 192. , to answer the complaint of Martha E Smith

against you in said Court exhibited. HEREOF fail not, as you will answer to the contrary at your peril:

WITNESS, the Honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the. day of. . 1920 Issued the day of. Clerk.

NOTICE TO THE PERSON SUMMONED:

"Personal attendance in Court on the day named in the above Writ is not required; but unless within such number of days thereafter as the law limits, legal defense is made to the above mentioned suit a judgment by default may be entered against you."

"The Defendant is required to file his Answer or other Defense in the Clerk's Office within fifteen days after the return day."

131 Ct. Ct. No. 2 haratil NO IN 19 C. 2 362 B Docket No. 29 Smith SIGNIE! VS. 1523 Barday mech Subpoena to Answer Bill of Complaint Var 90 No. 19402 3 Copy. Copied Filed 6 Mpril Filed 6 Mpril May J. Bond 2 1 des , 192 0 Solicitor. 12 22 · ...

EQUITY SUBPOENA The State of Maryland

2

To

5. 1 . .

Charles 9 Jarclay At

11

1.1.1.15

.

1 1

1

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you be in your person before Court No. 2 of Baltimore City, at the Court House in said city, on the second Monday of the **Gircy** quit, 192.O...., to answer the complaint of Marthy & Smith, against you in said Court exhibited. HEREOF fail not, as you will answer to the contrary at your peril: WITNESS, the Honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore uly City, the.. .day of Issued the.... day of.. /____, in the year 192 **(**) Clerk.

NOTICE TO THE PERSON SUMMONED:

"Personal attendance in Court on the day named in the above Writ is not required; but unless within such number of days thereafter as the law limits, legal defense is made to the above mentioned suit a judgment by default may be entered against you."

"The Defendant is required to file his Answer or other Defense in the Clerk's Office within fifteen days after the return day."

Ct. Ct. No. 2 362 3-1920 DOCKET No. 29 Montha Sunt Char Smith ORDER FOR APPEARANCE No 194023 Filed 9.3" day of ang 1920

1

Monther Sunth Chan Zu et

In the Circuit Court No. 2 of Baltimore City.

TERM, 191~

t MR. CLERK:

PLEASE ENTER MY APPEARANCE FOR DEFENDANT.

(? Foward Davis Solicitor.

No other witnesses being named or produced before me, I then, at the request of the Solicitor Solo of the Mspecu closed the depositions taken in said cause and now return them closed under/my day of M hand and seal, on this in the year of Our Lord nineteen hundred and......at the City of Baltimore, in the State of Maryland. ...(SEAL). Examiner. There are M Plaintiff's-----Exhibit-----..... _____ -----. Defendant's Exhibit _____ Examiner.

I, A. de RUSSY SAPPINGTON, the Examiner before whom the foregoing depositions were taken, do hereby certify that I was employed in assigning a day, and taking the said depositions upon days, on days, on of which I was employed by the Plaintiff, and on <u>mone</u> by the Defendant.

Examiner.