

3/15/32

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

B 419

MAUD NEAL

1926

VS.

YANCE NEAL

BILL FOR DIVORCE.

B 31065

Mr. Clerk:-

✓

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

Filed 21 Sept 1926

MAUD NEAL : IN THE CIRCUIT COURT
VS. : OF
YANCE NEAL : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, Yance Neal on the 3rd day of August, 1909 and with whom she resided until the 15th day of December, 1923.
2. That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said Yance Neal.
3. That the said Yance Neal 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 two children born as result of said marriage, William Neal, age sixteen years and James Neal, age fourteen years for whom the plaintiff asks the custody.
6. That the defendant 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.
7. That your Oratrix is destitute and without means of financing the expenses of this suit and she is advised by Counsel that she is entitled to have an order passed by this Honorable Court awarding her some amount as alimony pendente lite and a sum certain to compensate her Solicitor. The defendant is employed and earns twenty-five dollars per week.

8. That your Oratrix and the defendant are owners of 806 Rutland Avenue as tenants by the entireties; that by virtue of the above and other irreconcilable differences the parties to this suit are unable to come to any common understanding as to the use or disposition of the aforementioned property; that your Oratrix is ^{not} receiving, nor has she ever received any revenue from the aforementioned property, nor has she had the use of same since the separation; that the defendant is permitting the house to fall into such a state of ill-repair that the interest of your Oratrix is being materially damaged unless this Honorable Court will intervene.

TO THE END, THEREFORE YOUR ORATRIX PRAYS:

- (a) That a receiver may be appointed by this Honorable Court to take charge of all the assets held by your Oratrix and the defendant as tenants by the entireties in order to properly preserve the same during the pendency of this suit.
- (b) That a Trustee may be appointed with power and authority to sell same property and out of proceeds realized, less the legal charges and costs, pay to your Oratrix the amount that represents her interest in said property.
- (c) Alimony in such sum as the Court may decree during the pendency of this suit and a sum to compensate her Solicitor.
- (d) Custody of her two children, William and James.
- (e) A divorce a Vinculo Matrimonii.
- (f) 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 against the said Yance Neal 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.

Javis & Evans
SOLICITORS FOR PLAINTIFF.

Mrs Maud Neal

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this 21st day of September in the year one thousand nine hundred and twenty six, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City aforesaid, personally appeared Maud Neal and made oath in due form of law that the matters and facts stated in the foregoing petition are true to the best of her knowledge and belief.

AS WITNESS my hand and Notarial Seal.

Allen C. Fisher
NOTARY PUBLIC.

P 735

B419
1926

Ct. Ct.

Docket No.

Neal
vs

Neal.
806 Puttans Ave

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B 31065
(2)

Filed

2 Oct, 1926

Davis + Evans.

SOLICITOR

B-6

Summoned Gance Neal and a copy of the
Process, with a copy of the Bill of Complaint
served on the defendant, on the 27 day of September
1926. in presence of Michael H McKinley

John E. Pote
Sheriff

Yes J/30

EQUITY SUBPOENA

The State of Maryland

To

Gance Neal.

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

Maud Neal.

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 JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the *13* day of *September* 192*6*
Issued the *21* day of *September*, in the year 192*6*.

Charles 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.

B Docket 419

CIRCUIT COURT.

Maud Neal

vs.

Yance Neal

Order for Alimony

Pendente Lite

ORDER

B No. 31065

\$25 per wk
2 children

(3)

Fd: FA 22 Sept 1926
B L

Copy of the within Order of Court, served on Yance Neal on the 27th day of September 1926, in presence of Michael & McKinley.

John E. Poles
Sheriff

Fee \$0.50

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

Maud Neal

Yance Neal

September TERM, 1926

ORDERED BY THE COURT this 22 day of September 1926

that the defendant Yance Neal

pay to the plaintiff Maud Neal

the sum of Twelve

Dollars per week, during the continuance of this suit, accounting from the 22

day of September 1926 to the said plaintiff Maud Neal

as alimony, *pendente lite* unless cause to the contrary be shown on or before the 6

day of October 1926, provided a copy of this Order be served on the said defendant

Yance Neal on or before the 29th

day of September 1926

ent...

TRUE COPY—TEST:

CLERK

IN THE CIRCUIT COURT OF

419
1926

BALTIMORE CITY

B 419
1926

MAUD NEAL

VS.

YANCE NEAL

B 31065
4

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

E. Jackson
ATTORNEY FOR RESPONDENT

E. JACKSON, ATTORNEY
109 E. Pleasant St.

Filed Oct 1926.

MAUD NEAL : IN THE CIRCUIT COURT

VS. : OF

YANCE NEAL : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the bill of complaint filed and exhibited in this Court respectfully says:

1. That the marriage is admitted as alleged by the plaintiff, as is also the birth of two minor children to bless the union of the respective parties.
2. That it is also and further admitted that both parties are residents of the City of Baltimore, State of Maryland and for the requisite period to give Jurisdiction to these proceedings.
3. Your respondent denies the allegation of adultery and puts the plaintiff on her strictest legal proof.
4. Your respondent also denies that he is a man of means, but says that he is an unskilled laborer and earns his livelihood by weekly wages.
5. Your respondent also denies that the property known as 806 Rutland Ave. is being paid for by the plaintiff's ^{and} but says that your respondent is keeping up the payments with the Building and Loan Association, and that the property is in good repair.

Having answered all the material allegations and in due time, your respondent prays that the Bill be hence dismissed with the attending costs and that the Order thereon vacated.

AND as in duty bound, etc.

RESPONDENT

E. Jackson
SOLICITOR FOR RESPONDENT

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this 1st day of October, in the year one thousand nine hundred and twenty six, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City aforesaid, personally appeared Yance Neal, respondent in the above entitled case, and made oath in due form of law that the matters and facts in the foregoing answer are true to the best of his knowledge and belief.

AS WITNESS my hand and Notarial Seal.

Helen C. Fisher

NOTARY PUBLIC .

Davis & Evans

66349

Ct. Ct.

1926

No. :

Docket

Maudie Neal

vs.

Jane Neal

MOTION FOR HEARING

B. 31065
No. 107

E. Jackson

Filed ~~25~~ 23 day of October 1926

Mauds Neal

vs.

Gance Neal

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The *complaint* by *Davis & Evans*

her

Solicitor, applies to have the above entitled cause placed on the Trial Calendar

for hearing *on alimony pendente lite*

in conformity with the First Equity Rule.

Davis & Evans

Solicitor for *complaint*

Serve on

E. Jackson

*Service admitted
This 27th Oct. 1926
E. Jackson*

*189
Present
st*

TRINIDAD
COURT

Ct. Ct.

419
1926 No. B-66 Docket

Neal

vs.

Neal

NOTICE OF HEARING

(1)

B- No. 31065
(6)

No.

Filed 23 day of Oct. 1926

H

*Copy of the within Notice served on E. Jackson, Solicitor
on The 27th day of October, 1926, in the presence
of Louis Hecht.*

*John E. Potter
Sheriff*

Fee \$0.50

Maude Neal

vs.

Wance Neal

IN THE

CIRCUIT COURT

OF BALTIMORE CITY

Upon application made by the Solicitor for the

.....
Complainant

the above entitled cause has been placed upon the trial calendar in
accordance with the provisions of the First Equity Rule, and the
same will stand for hearing on Alimony Pendente Lite

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

66-419 - B 31065

In the Court Room
of
Balto City
B 419
1926
Maude Neal

or

James Neal
—

Recusal
—

Mr. C. H. Pleasant

Mrs. Evans
B 31065
(7)

Feb 7th Jan 1927

MAUD NEAL

VS

YANCE NEAL

:

:

:

:

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY.

Mr. Clerk:-

Please dismiss the Bill of Complaint, in the above
entitled case the Plaintiff to pay the cost.

Paul Swan

Attorney for Plaintiff.

Maud Neal