

IN THE CIRCUIT COURT OF

BALTIMORE CITY

*100
2/19/27*

GEORGE W. DAVIS

VS.

LILLIE DAVIS

P E T I T I O N

Mr. Clerk:-

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF

2/14/27

DAVIS & EVANS

ATTORNEYS AT LAW

H. Sommer 1927

3/9/2/20

229

GEORGE W. DAVIS : IN THE CIRCUIT COURT
VS. : OF
LILLIE DAVIS : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully says:

I. That he was married to his wife, Lillie Davis, on the 20th day of March, 1900 in the City of Baltimore, State of Maryland; that on or about the 5th day of May 1923 your Orator and the respondent purchased for the amount of \$1850.00, subject to a mortgage of \$1500.00, as tenants by the entireties, a two and a half story brick dwelling known as 1414 E. Monument St, in Baltimore City, State of Maryland, subject to an annual ground rent of twelve (\$12.00) dollars. That your Orator and the respondent are still possessed as tenants by the entireties of

the aforementioned property. *A copy of the deed to the parties to this suit will be filed with the proceedings hereof to be marked exhibit "A."*

2. That because of irreconcilable differences that have arisen between your Orator and the respondent the interests of the respondent and your Orator are in immediate danger of being destroyed by virtue of the non payment of the weekly instalments due or to become due on the aforementioned mortgage; that the nature of the property is such that it can not be divided in kind; that by virtue of the aforementioned irreconcilable difference, the parties to this suit are unable to arrive at any common understanding as to the use, enjoyment or disposition of this common property.

TO THE END, WHEREFORE, YOUR ORATOR PRAYS:

a- That a receiver or receivers may be appointed by this Honorable Court to take charge of the joint property, 1414 E. Monument St. in order to properly preserve same during the

pendency of this suit.

(b) That a Trustee or Trustees be appointed with power and authority to sell same property and to divide the proceeds remaining out of the purchase prices, after payment of all legal charges and costs against the property, between the respondent and your Orator.

May it please your Honor to grant unto your Orator the Writ of Subpoena directed against the said Lillie Davis, commanding and requiring her 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.

Davis & Evans

SOLICITORS FOR PLAINTIFF

Geo. H. Davis

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

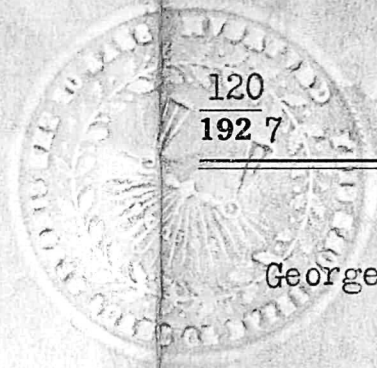
I HEREBY CERTIFY, that on this *2nd* day of March, in the year one thousand nine hundred and twenty seven, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City aforesaid, personally appeared GEORGE W. DAVIS, who made oath in due form of law that the matters and facts in the foregoing petition are true to the best of his knowledge and belief.

AS WITNESS my hand and Notarial Seal.

Helen C. Foster

NOTARY PUBLIC.

1414 E. Movement
P 63



Ct. Ct.

120
1927

Docket No. A-67

George W. Davis

vs.

Lillie Davis

SUBPOENA TO ANSWER BILL OF COMPLAINT

a *100 + 120*

No. 14848

(2)

Filed *14 March*, 1927.

Davis & Evans

SOLICITOR S

3

*Summoned Lillie Davis and a copy of the
Process with a copy of the Bill of Complaint
left with the defendant on the 10th day of March
1927 in the presence of Albert J. Bachmann
John E. Potee
Sheriff.
J. W. H. W.*

RECEIVED
THE SHERIFF'S OFFICE
MAR 3 1927 11

EQUITY SUBPOENA

The State of Maryland

To

Lillie Davis, 1414 E. Monument St.

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

George W. Davis

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 10th day of January 1927. Issued the 2nd day of March, in the year 1927.

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.

Ct. Ct.

1927

Docket

67A 120

George W. Davis

vs.

Sellie Davis

Decree Pro Confesso.

No. 4848

(3)

Filed

9 June

1927

George W. Davis
vs.
Lillie Davis

IN THE
Circuit Court
OF
BALTIMORE CITY.

May Term, 1927

The Defendant having been duly summoned (~~notified by Order of Publication~~) to appear to the Bill of Complaint, and having failed to appear thereto, according to the exigency of the writ, (~~said Order~~).

It is thereupon this 9th day of June in the year nineteen hundred and twenty seven by the Circuit Court of Baltimore City, ADJUDGED, ORDERED and DECREED, that the complainant is entitled to relief in the premises, and that the bill of Complaint be and is hereby taken pro confesso against the defendant. But because it doth not certainly appear to what relief the Plaintiff is entitled, it is further *Adjudged*, and *Ordered*, that one of the Examiners of this Court, take testimony to support the allegations of the bill.

H. Arthur Stamp