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Inherent Court No 2

Baeth ~~with~~

Agrippa Turner

vs

Rena Turner

Turner & Turner

Mr (Berh please file

C. Stewart Davis

No 1904013
1

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BALTIMORE, MD.

Ed. 8 April 1920

Agrippa Turner

In The Circuit Court no. 2

vs.

of

Lena Turner

Baltimore City.

To The Honorable, The Judge of Said Court:

Your Orator complaining, respectfully says:

That the parties hereto were married December 4th. 1912 by Rev. Junius Gray, in Baltimore City and lived together as man and wife until on or about August 22nd. 1918.

SECOND, That your orator is a resident of the city of Baltimore, state of Maryland, and has been for more than two years prior to the filing of this bill of complaint. That the respondent is a resident of the city also.

THIRD, That although the conduct of your orator towards his wife has always been kind, affectionate, and above reproach, she without any just cause or reason, abandoned your orator. She committed adultery with one George Jones and other lewd and abandoned men whose names are unknown to your orator.

FOURTH, That your Orator has not lived with the said Lena Turner, since he discovered the said adultery, nor has he condoned the said adultery.

FIFTH, That there is one child, Dorothy, six years old.

WHEREFORE YOUR ORATRIX PRAYS:

- a-a A divorce a vinculo matrimonii from the respondent.
- b-b Such other and further relief as the case may require.
- c-c The care and custody of the minor child.

May it please Your Honor to grant unto Your Oratrix a writ of subpoena, directed unto the said respondent, commanding her to be or appear in this Court on some day certain, to be named therein, to perform such decree as may be passed in the premises.

As in duty bound etc.

Agrippa Turner
Complainant

R. B. Jan
Solicitor for Complainant.

State of Maryland)
) To Wit
Baltimore City)

I hereby certify on this *8th* day of *April* 1920,
before me the subscriber a Notary Public in and for the ~~city~~ *County* of
Baltimore, state of Maryland, personally appeared Agrippa Turner,
the complainant in the foregoing bill and made oath in due form
of his knowledge and beleif.

Arthur N. Rogers

Notary Public.

527

Ct. Ct. No. 2

174
1920 B Docket No. 29

Turner

vs.

Richardson & Belcher
Turner

Subpoena to Answer Bill of Complaint

Pro

No. 19040 B
1/2

Copy = Copies

Filed 10 May 1920
Steward Davis
Solicitor.

10-17

10-17

now Est
Thomas J McRully
Sheriff
(Yaffe) - (Kelly)

EQUITY SUBPOENA
The State of Maryland

To

Lena Turner

Gellman School for Boys

of Baltimore City, Greeting:

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

May

, 192*0*, to answer the complaint of

Agrispa Turner

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 *8* day of *March*, 192*0*

Issued the *24* day of *April*, in the year 192*0*

John Pleasants

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.”

503 LK

Ct. Ct. No. 2

175
1920

Docket No. 29

Turner

vs.

Turner

1033 Argyle Ave

Subpoena to Answer Bill of Complaint

Put

No. 19040 B.
2

Copy = copied

Filed 12 April, 1920
Steward Davis
Solicitor.

SP 3473

10

Thomas F. Maulty
Sheriff

Wm. C. C. (Kelly)

EQUITY SUBPOENA
The State of Maryland

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Clerk.

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Ct. Ct. No. 2

175
1920

Docket No. 29

Turner

vs.

Turner

Subpoena to Answer Bill of Complaint

Copy

No.

Filed, 192

Solicitor.

EQUITY SUBPOENA
The State of Maryland

To



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TRUE COPY TEST.

John Pleasanto
CLERK.

Ct. Ct. No. 2

174
192 0 B

Docket No. 39

Turner

vs.

Turner

Subpoena to Answer Bill of Complaint

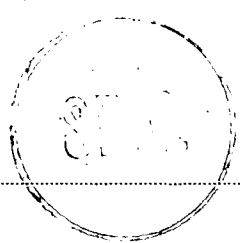
No. Copy

Filed _____, 192

Solicitor.

EQUITY SUBPOENA
The State of Maryland

To



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CLERK.