

3/12/24

B 5457, 1924

In the Circuit Court,
No. 2,
Baltimore City.

HARRY E. THOMAS

VS.

FANNIE THOMAS.

706

Bill for divorce,
A VINCULO MATRIMONII.

No 22,73 B

Mr. Clerk:--

Please file &c.,

Roy S. Bond
Sol. for Plaintiff.

ROY S. BOND
ATTORNEY AT LAW
215 ST. PAUL PLACE
BALTIMORE, MD

FILED

3 November 1924

HARRY E. THOMAS

VS.

FANNIE THOMAS

In the Circuit Court,
No. 2,
Baltimore City.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator, Harry E. Thomas complaining, respectfully says:

(1) That he was married to his wife, Fannie Thomas in Baltimore City, State of Maryland, on or about the 14th day of August 1915, with whom he resided until on or about the 26th day of October 1919.

(2) That the defendant is a resident of Baltimore City, State of Maryland, and has been for more than two years prior to the filing of this Bill of Complaint.

(3) That though the conduct of your Orator towards his said wife, Fannie Thomas, has been kind, affectionate and above reproach, she without any just cause or reason, abandoned and deserted him, and has declared her intentions to live with him no more; that such abandonment has continued uninterruptedly for more than three years, is deliberate and final, and the separation of the parties is beyond any reasonable hope or expectation of a reconciliation.

(4) That there are no children as issue of said marriage.

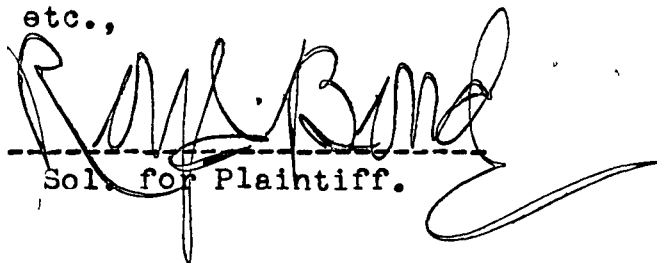
WHEREFORE YOUR ORATOR PRAYS:

-a- A divorce, A Vinculo Matrimonii,
from the defendant, Fannie Thomas,

-b- Such other and further relief as
the case may require.

May it please your Honor, to grant unto your Orator, Harry E. Thomas, the writ of subpoena, directed unto the said defendant, Fannie Thomas, residing 706 George Street, commanding her to be and appear in this Court, in person or by solicitor, on some day certain to be therein named, and perform such decree, as may be passed in the premises.

As in duty bound, etc.,


Solicitor for Plaintiff.

411

Ct. Ct. No. 2

5745 B
1922 Docket No 31

Thomas
736 vs. George
Thomas

Subpoena to Answer Bill of Complaint

Pr
~~706 George~~
No. 22173 B
21

Copy-Copied

Filed 13 November 1922
Roy S. Bond
Solicitor.

10

Summoned and a copy of the process go
with the deponents
(Kelly) 11/9/22
Thomas F. McCallity
Sheriff
Dec 11/22

EQUITY SUBPOENA
The State of Maryland

To

Fannie Thomas
706 George 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 *November*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Kary E Thomas

against you exhibited in the CIRCUIT COURT No. 2 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 *11* day of *September*, 192*2*

Issued the *3* day of *November*, in the year 192*2*

John Pleasants
Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

1932
IN THE CIRCUIT COURT NO. 2

OF
BALTIMORE CITY.

HARRY E. THOMAS

VS.

FANNIE THOMAS

DEFENDANT'S ANSWER

Mr. Clerk:-

Please file.

3

Stewart Davis
ATTORNEY FOR DEFENDANT.

DAVIS & BISHOP
ATTORNEYS AT LAW
BANNEKER BUILDING
14 E. PLEASANT STREET
BALTIMORE, MD.

July 16 Stowers 1932

HARRY E. THOMAS : IN THE CIRCUIT COURT NO. 2
VS. : OF
FANNIE THOMAS : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

The answer of the defendant to the petitioned complainant respectfully shows as follows:-

(1)

The defendant admits the first paragraph of the plaintiff's amended bill of complaint.

(2)

The defendant admits the second paragraph of the plaintiff's bill of complaint.

(3)

The defendant denies with great emphasis the third paragraph of the plaintiff's bill of complaint.

(4)

The defendant admits the fourth paragraph of the plaintiff's bill of complaint.

(5)

Your defendant states that the plaintiff is employed as a cook and earns about thirty-five dollars a week. That your defendant is without means with which to defray the expenses of the litigation; that she is advised by counsel that she is entitled to have an order passed by this Honorable Court awarding her a sum certain as alimony during the progress of this suit and a further sum to compensate her solicitor for his services in the cause.

WHEREFORE YOUR DEFENDANT PRAYS:

(a). That an order be passed allowing her alimony
pendente lite and counsel fee in a sum as this Honorable
Court may think just and proper.

Fannie Thomas
DEFENDANT

[Signature]

ATTORNEY FOR DEFENDANT

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this 15th day of November,
in the year one thousand nine hundred and twenty two, before
me, the subscriber, a Notary Public of the State of Maryland
in and for Baltimore City aforesaid, personally appeared
Fannie Thomas, the defendant in the foregoing Bill and made
oath in due form of law that the matters and facts contained
in the foregoing answer are true to the best of her knowledge
and belief.

WITNESS my hand and Notarial Seal.

[Signature]
NOTARY PUBLIC.