

3/13/32

IN THE CIRCUIT COURT OF

BALTIMORE CITY

B 544  
1926.

LENA HARRIS

VS.

CHARLES HARRIS

BILL FOR DIVORCE.

B 31285

Mr. Clerk:-

17 2

Please file.

*Davis Evans*

Attorneys for plaintiff

DAVIS & EVANS  
ATTORNEYS AT LAW

7d-27 Dec 1926

LENA HARRIS : IN THE CIRCUIT COURT

VS. : OF

CHARLES HARRIS : BALTIMORE CITY

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

- I. That she was married to her husband, Charles Harris on the 30th day of December, 1920 in Washington, D.C. and with whom she resided until the 4th day of September, 1923 when the defendant deserted the plaintiff.
2. That though the conduct of your Oratrix toward the said Charles Harris has always been kind, affectionate and above reproach, he has, without any just cause or reason, abandoned and deserted her and has declared his intentions to live with her no longer, and that such abandonment has continued uninterruptedly for more than three years and is deliberate and final and the separation of the parties is beyond any reasonable hope of reconciliation.
3. That the said Charles Harris 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 said desertion and since she discovered his said adulteries.
5. That there are no children born as result of said marriage.
6. That your Oratrix is a citizen of the State of Maryland having resided in Baltimore City for more than three years prior

to the filing of this Bill of Complaint, but that the defendant is a non-resident of the State of Maryland and when last heard of was in Philadelphia, Pennsylvania.

TO THE END, THEREFORE:

- (a) That your Oratrix may be divorced A Vinculo Matrimonii from the said Charles Harris.
- (b) That she may resume her maiden name MARRS.
- (c) That she may have such other and further relief as her case may require.

May it please your Honor to grant unto your Oratrix the Order of Publication directed against the said Charles Harris, a non-resident of the State of Maryland, 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.

*Davis & Evans*

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ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS, SOLICITORS

215 St. Paul Place

IN THE CIRCUIT COURT OF BALTIMORE CITY

LENA HARRIS VS. CHARLES HARRIS

ORDER OF PUBLICATION

The object of this Bill is to procure a divorce A Vinculo Matrimonii by the plaintiff, Lena Harris, from the defendant, Charles, Harris.

The bill recites that the parties were married in Washington, D.C. Dec. 30, 1920 and lived together until the 4th day of September, 1923 when the defendant deserted the plaintiff. That though the conduct of your Oratrix toward the said Charles Harris has always been kind, affectionate and above reproach, he has, without any just cause or reason, abandoned and deserted her and has declared his intentions to live with her no longer and the separation of the parties is beyond any reasonable hope of reconciliation. That the said Charles Harris 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. That your Oratrix has not lived or co-habited with the said defendant since she discovered said adulteries and since said desertion. That there are no children born as issue of said marriage. That your Oratrix is a citizen of the State of Maryland but that the defendant is a non-resident of the State of Maryland and when last heard of was in Philadelphia, Pennsylvania.

It is thereupon ordered by the Circuit Court of Baltimore City this 7 day of <sup>December</sup> 1926 that the plaintiff by causing a copy of this order to be inserted in some daily newspaper published in Baltimore City, once a week for four successive weeks before the 7 day of <sup>January</sup> 1927, give notice to the absent defendant of the object and substance of this bill, warning him to be and appear in this Court in person or by Solicitor on or before the 24 day of <sup>January</sup> 1927 to show cause, if any she may have, why a decree should not be passed as prayed.

*Citron*