

In The Circuit Court ~~of~~
of
Baltimore City 3

1921
Evelyn Efford

vs

Charles Efford

Breeford J. Moore & Vincent

Mr Clerk please file

(~~the~~) and

B 21996
(1)

DAVIS & BISHOP

ATTORNEYS AT LAW

18 E. LEXINGTON STREET

BALTIMORE, MD.

sd 5 January 1921

Evelyn Offord

In The Circuit Court

vs.

of

Charles Offord

Baltimore City.

To The Honorable, The Judge of Said Court:

Your Oratrix, complaining, respectfully says:

FIRST, That the parties hereto were married on or about October 2, 1920, by Rev. Harmon, a Methodist minister in Baltimore City State of Maryland. They lived together as man and wife until on or about December 30th. 1920.

SECOND, That both parties are residents of the city of Baltimore, state of Maryland and have been for more than two years prior to the filing of this bill of complaint.

THIRD, That though the conduct of your Oratrix toward her husband has always been kind, affectionate and above reproach, he without any just cause or reason committed the crime of adultery with lewd and abandoned women whose names are unknown to your Oratrix.

FOURTH, That your oratrix has never condoned nor forgiven the said adultery.

FIFTH, That there are no children born as a result of said marriage.

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.

May it please Your Honor to grant unto Your Oratrix a Writ of Subpoena, directed unto the said respondent, commanding him 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.

Emelyn Afford

Complainant

(S. J. J. J.)

Solicitors For Complainant.

Evelyn Offord

In The Circuit Court

vs.

of

Charles Offord

Baltimore City.

To The Honorable, The Judge of Said Court:

Your Oratrix, complaining respectfully states that the defendant is employed as a laborer and earns from forty to fifty dollars a week; that your Oratrix is without means with which to defray the expenses of this 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.

Evelyn Offord (*Lawyer*) *att for plaintiff*

WHEREFORE YOUR ORATRIX PRAYS:

a-a That an order be passed allowing her alimony Pendite Lite, a counsel fee in sum as this Honorable Court may think just and proper.

State of Maryland)
Baltimore City) To Wit:

I hereby certify that on this day of 1920, before me the subscriber, a notary Public in and for Baltimore City, State of Maryland, personally appeared Evelyn Offord, the complainant in the foregoing Bill and made oath in due form of law that the matter contained in the same was true to the best of her knowledge and belief.

Notary Public.

445

3 B6d

Ct. Ct.

1921

Docket No.

428 N. Spring St

Offord 1/7/24

Offord

SUBPOENA TO ANSWER BILL OF COMPLAINT

Put

No.

B. 21996

(2)

Filed

10 Jan

1921

J. S. Davis

SOLICITOR

3

Summoned and a copy of the Process left
with the defendant.

Thomas F. McQuilly
Sheriff

(Finkelstein) 1/7/21
Fees \$0.80

Defendants address
428 N. Spring St

To

Charles Offord



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

Evelyn Offord

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *8th* day of *November* 192*0*

Issued the *3rd* day of *January*, in the year 192*1*

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.

(General Equity Rules 11.)

EQUITY SUBPOENA

The State of Maryland

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Charles Offord



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(General Equity Rules 11.)

In The Circuit Court
of Bz 3
Baltimore City 1/21

Evelyn Oford

vs

Charles Oford

Petitioner for dismissal

Mr. Clerk please file

J. S. Davis

Bz 1996

3

DAVIS & BISHOP
ATTORNEYS AT LAW

118 E. LEXINGTON STREET
BALTIMORE, MD.

A 10 Jan 1921

Evelyn Offord

In The Circuit Court

vs.

of

Charles Offord

Baltimore City.

To The Honorable, The Judge of Said Court:

Your petitioner respectfully says that on 3rd
day of Jan, 1940, she filed in this Honorable
Court a bill praying a divorce A Vinculo Matrimonii from
the defendant.

Your petitioner states that she has forgiven the
defendant for the alleged wrong therein stated and that
she and the defendant have become again reconciled and
intend to live again as man and wife.

WHEREFORE YOUR PETITIONER PRAYS:

That the bill be dismissed with costs.

Evelyn Offord

(C. Howard) Jones

Attorney For Complainant.