

IN THE -----
CIRCUIT COURT NO. 2
BALTIMORE CITY.

JOHN WILSON BROWN

VS.

REBECCA BROWN.

713 Harlem Ave
Bill for Divorce
A VINCULO MATRIMONII.

Mr: Clerk:

No 30117 B.

Please file &c.,

< 17

Roy S. Bond

Sol. for Plaintiff.

ROY S. BOND
ATTORNEY AT LAW
14 E. PLEASANT ST.
BALTIMORE, MD.

FILED

25 - August 1928

JOHN WILSON BROWN

IN THE

VS.

CIRCUIT COURT NO. 2

-- REBECCA BROWN----

BALTIMORE CITY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

Your Orator- JOHN WILSON BROWN- complaining,
respectfully says:

1. THAT HE WAS MARRIED TO HIS WIFE, Rebecca Brown, in Baltimore City, State of Maryland, on or about the 12th day of December, 1922, with whom he resided until on or about the 30th day of November, 1923.

2. THAT BOTH PARTIES ARE RESIDENTS of Baltimore City, State of Maryland, and have been for more than two years prior to the filing of this, his Bill of Complaint.

3. THAT THOUGH THE CONDUCT of your Orator towards his said wife, has been kind, affectionate and above reproach in all respects, she, without just cause or reason, has 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-- REBECCA BROWN--

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

MAY IT PLEASE YOUR HONOR, to grant unto your
Orator-John Wilson Brown, the writ of subpoena, directed unto the
said defendant, REBECCA BROWN, residing 713 Harlem Avenue, 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.

P 471
Circuit Court No. 2

⁴⁴⁹
1928 B DOCKET No. 37

Brown

vs.

Brown

713 ~~Harlem~~
ave.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. 30117 B

27

copy - Lovin d.

Filed 4 day of Sept 1928

Roy S. Bond

Solicitor.

Summoned and a copy of the Process
left with the defendant

Bichy

8/28/28

John. E. Pottle

Deo p. q. Sheriff

AUG 26 12 39 AM

RECEIVED AT
THE SHERIFFS OFFICE ON

EQUITY SUBPOENA
The State of Maryland

To

Rebecca Brown
713 Harlem Ave

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 September, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

John Wilson Brown

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 9 day of July, 1928
Issued the 25 day of August, in the year 1928

John Pleasant

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.)

JOHN WILSON BROWN

:

IN THE CIRCUIT COURT NO.2

VS.

:

OF

REBECCA BROWN

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the Bill of Complaint in the above cause respectfully says:

- (1) That she admits the date of marriage in the first paragraph of the bill of complaint but denies that the separation took place Nov.30, 1923.
- (2) That she admits the allegations in the second paragraph of the Bill of Complaint.
- (3) That she denies the allegations in the third paragraph of the Bill of Complaint.
- (4) That she admits the allegations contained in the fourth paragraph of the Bill of Complaint. And further answering said paragraph, your respondent says that the plaintiff deserted the defendant in October 1925 without cause or reason and that your respondent has always been willing and ready to live with the plaintiff as his wife.
- (5) Your respondent is sick and unable to support herself or retain counsel to defend this action. She is advised by Counsel that she may petition this Honorable Court for an allowance as alimony pendente lite and a reasonable sum to pay her Solicitor to defend her. The defendant is employed and can earn thirty-five dollars per week.

WHEREFORE your respondent prays that the Bill be hence dismissed with costs.

AND as in duty bound, etc.

Davis Evans
ATTORNEY FOR RESPONDENT

IN THE CIRCUIT COURT NO. 2

37 B/244/1928

BALTIMORE CITY.

JOHN W. BROWN

VS.

REEBECCA BROWN

PETITION FOR ALIMONY

Mr. Clerk:

Please file.

George W. Evans
ATTORNEY FOR PETITIONER

No 30117 B.

47

DAVIS & EVANS
ATTORNEYS AT LAW

Filed 10, October 1928

JOHN W. BROWN

:

IN THE CIRCUIT COURT NO. 2

VS.

:

OF

REBECCA BROWN

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The petition of Rebecca Brown, respondent in the above entitled cause says:

(1) That her husband, John W. Brown filed a bill in this Honorable Court against her praying among other things, a divorce A Vinculo Matrimonii.

(2) That on the 24th day of September, 1928 your respondent fully answered the bill.

(3) Your respondent says that she is sick, and unable to support herself or retain counsel to defend this action; that she is advised by counsel that she may petition this Honorable Court for an allowance as alimony pendente lite and a reasonable amount to compensate her solicitor; that the plaintiff is employed and can earn thirty-five dollars per week.

WHEREFORE, YOUR RESPONDENT PRAYS:

- (a) Alimony pendente lite.
- (b) Counsel fee.
- (c) Such other and further relief as her case may require.

George W. Evans

ATTORNEY FOR RESPONDENT

Serve on
John Wilson Brown
Plaintiff

B DOCKET ⁴⁴⁹/₁₉₂₈

Circuit Court No. 2

Brown

vs.

Brown

Order Counsel Fee and Alimony
Pendente Lite
Husband Plaintiff

ORDER

No. 30117 B

(5) L67

copy - Lemuel
copy - Conroy

Filed 17 - October 1928

Davis & Brown
P.

Now Est John E. Potter Sheriff

Now Est John E. Potter Sheriff

(2nd Return)

THE SHERIFF'S OFFICE
OCT 17 1928 3 10 PM

John Wilson Brown
vs.
Rebecca Brown

IN THE
Circuit Court No. 2

-OF-

BALTIMORE CITY

September TERM, 1928

ORDERED BY THE COURT, This 11 day of October 1928

that the Plaintiff John Wilson Brown
pay to the Defendant Rebecca Brown
the sum of Twenty-five Dollars as Counsel Fee for the
Solicitor of the Defendant, and that he further pay the sum of Eleven
Dollars per week, during the continuance of this suit, to the said Defendant.

Rebecca Brown

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 26-

day of October 1928, provided a copy of this Order be served on the said Plaintiff

John Wilson Brown on or before the 16-

day of October 1928

Joseph N. Newman

TRUE COPY—TEST:

no chkd \$35. per week

Clerk.

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court No. 2 of Baltimore City this 22 day of October 1928, that the time for showing cause under said Order be extended to the 7 day of November 1928, and the time for service of a copy of the same be extended to the 27 day of October 1928.

Joseph N. Newman

B DOCKET

449

1928

Circuit Court No. 2

Brown

vs.

Brown

Order Counsel Fee and Alimony

Pendente Lite

Husband Plaintiff

ORDER

Long

No. _____ B

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Filed _____ 192

IN THE

Circuit Court No. 2

-OF-

BALTIMORE CITY

September TERM, 1928

John Wilson Brown vs. Rebecca Brown

ORDERED BY THE COURT, This 11- day of October 1928

that the Plaintiff John Wilson Brown pay to the Defendant Rebecca Brown the sum of Twenty-five Dollars as Counsel Fee for the Solicitor of the Defendant, and that he further pay the sum of Eleven Dollars per week, during the continuance of this suit, to the said Defendant

Rebecca Brown

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 26-

day of October 1928, provided a copy of this Order be served on the said Plaintiff

John Wilson Brown on or before the 16- day of October 1928

Joseph N. Whelan

TRUE COPY-TEST:

John Pleasant Clerk.

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court No. 2 of Baltimore City this 22- day of October 1928, that the time for showing cause under said Order be extended to the 7- day of November 1928, and the time for service of a copy of the same be extended to the 27- day of October 1928.

Joseph N. Whelan

True copy test, John Pleasant Clerk.