

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

*B 17*  
*1928*

JUSTINE EVELYN JOHNSON

VS.

EDWARD HICKS JOHNSON

BILL FOR DIVORCE.

*B 32623*

Mr. Clerk:

Please file.

*Davis Evans*

ATTORNEY FOR PLAINTIFF

DAVIS & EVANS

ATTORNEYS AT LAW

*FD 12 Jan 1928*

JUSTINE EVELYN JOHNSON : IN THE CIRCUIT COURT  
VS. : OF  
EDWARD HICKS JOHNSON : BALTIMORE CITY.

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully says:

- (1) That she was married to her husband, Edward Hicks Johnson, on or about the 16th day of June, 1926 and with whom she resided until on or about the 29th day of March, 1927.
- (2) That every since said marriage, your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said Edward Hicks Johnson and her entire conduct has always been above reproach.
- (3) That for some months before their separation, the said Edward Hicks Johnson, her husband, treated her with great cruelty, harshness and brutality, striking and beating her and that he became so violent in his attacks on her that her life was endangered.
- (4) That for about six months prior to the 29th day of March, 1927, the said James Hicks Johnson, struck and beat her in the presence of her friends and associates, threatening her life on one occasion, and that he called her low names without cause or provocation.
- (5) That the defendant, Edward Hicks Johnson, has at divers times and places, committed the crime of adultery with divers, lewd and abandoned women, whose names to your Oratrix are unknown and that she has not lived or co-habited with the said defendant since she learned of the adulteries and said offense has not been condoned by your Oratrix.
- (6) That there are no children born as result of said marriage.

(7) Both the plaintiff and defendant are residents of Balto city state of Maryland having lived here for more than two years prior to the filing of this bill.

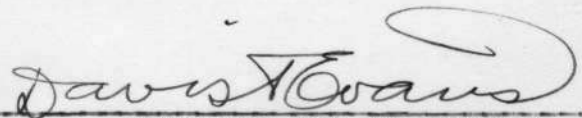
TO THE END, THEREFORE, YOUR ORATRIX PRAYS:

(a) That she may be divorced A Vinculo Matrimonii from the said Edward Hicks Johnson.

(b) 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 Writ of Subpoena directed against the said Edward Hicks Johnson, 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.



ATTORNEY FOR PLAINTIFF

P 583

Ct. Ct.

B-17  
1928 Docket No. ✓

Justine Evelyn Johnson

vs.

Edward Hicks Johnson

17/2 Edward Hicks Johnson

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B-32623  
(2) (3)

Filed 13 Feb 1928  
" 12 March 1928  
Davis & Evans

SOLICITOR

D-11

Iron Ent  
(Lycutt)

John E. Potes  
Sheriff

2/13 1928

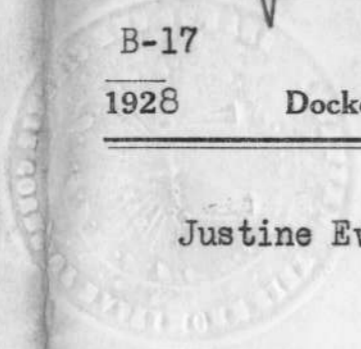
REISSUED TO March Return Day 1928  
Leah R Whiteford  
Clerk

Iron Ent  
(Lycutt)

John E. Potes  
Sheriff

JAN 12 1928 3 20 PM

RECEIVED BY MAIL  
JAN 12 1928



MEMORANDUM: You are required to file your answer or other pleading in this cause in the Court of Chancery, Baltimore, Md., within the time specified in the subpoena attached hereto. In the event you fail to do so, the Court may proceed to render judgment against you as a party in default. This subpoena is issued under the authority of the Court of Chancery, Baltimore, Md., and is returnable to the Court of Chancery, Baltimore, Md., on the 13th day of February, 1928.



EQUITY SUBPOENA

The State of Maryland

On Edward Hicks Johnson



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

Justine Evelyn Johnson

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 JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the 9th day of January 192 8 Issued the 12th day of January, in the year 192 8.

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.

Ct. Ct.

192

Docket No.

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**SUBPOENA TO ANSWER BILL OF COMPLAINT**

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No.

Filed....., 192....

**SOLICITOR**

EQUITY SUBPOENA

The State of Maryland

On Edward Hicks Johnson

*(copy)*



REISSUED TO March <sup>2/13</sup> 1928  
Return Day, 1928  
Chas R Whiteford  
Clerk

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