

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

*B 46
1928*

HATTIE YOUNG

VS.

AARON YOUNG

B 32679

BILL FOR DIVORCE.

MR. Clerk:

Please file.

Davis & Evans
ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

Filed 1st Feb 1928.

HATTIE YOUNG

:

IN THE CIRCUIT COURT

VS.

:

OF

AARON YOUNG

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully says:

(1) That she was married to her husband, Aaron Young, on the 20th day of September, 1923 and with whom she resided until the 15th day of March, 1927.

(2) That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said Aaron Young and her entire conduct has always been above reproach.

(3) That for some months before their separation, the said Aaron Young, 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 her husband, Aaron Young, several times prior to the separation, beat and struck her in the presence of her friends and associates, threatening her life on two occasions and acted in such a manner that she feared for her life and that he called her low names without cause or provocation.

(5) That the defendant, Aaron Young, 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) Your Oratrix says that she is destitute and without funds to properly prosecute her case and support herself. She is advised by Counsel that she may petition this Honorable Court for a reasonable amount to compensate her Solicitor and an amount as alimony pendente lite.

(8) The defendant is employed and earns about thirty-five dollars per week.

(9) That both your Oratrix and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this Bill of Complaint.

TO THE END, THEREFORE, YOUR ORATRIX PRAYS:

(a) That she may be divorced A Vinculo Matrimonii from the said Aaron Young.

(b) Alimony pendente lite and Counsel fee.

(c) 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 Aaron Young, 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 Thomas
ATTORNEYS FOR PLAINTIFF

FEB 2 1928 10 36 AM

P 739 ✓
13

Ct. Ct.

B-46
192 8

Docket No.

Hattie Young
vs.
Aaron Young

Beets to be by John

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B-32679

(2) (4) (5)

Filed 13 Feb, 1928
" 12 Mich 1928
" 23 June 1928.
Davis & Evans SOLICITOR

B-4

Now Est John E. Potee Sheriff

2/13 8

REISSUED TO March
Chas R Whitford
Clerk

Now Est John E. Potee Sheriff 6/18 8

REISSUED TO July Return July, 1928
Chas R Whitford
Clerk

Summoned Aaron Young and a copy of the Process left with the defendant (Mcroylan) 6-20-28
New No 95 John E. Potee Sheriff

EQUITY SUBPOENA

The State of Maryland

On Aaron Young

Baltimore City Jail

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

Hattie Young

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 1928 Issued the 1st day of February, in the year 1928.

Chas 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.

Hattie Young

vs.

Aaron Young

IN THE
CIRCUIT COURT

OF
BALTIMORE CITY

January TERM, 1928.

ORDERED BY THE COURT this 1st day of February 1928

that the defendant Aaron Young

pay to the plaintiff Hattie Young

the sum of Twelve (\$12.00) - - - - -

Dollars per week, during the continuance of this suit, accounting from the 1st

day of February 1928 to the said plaintiff Hattie Young

as alimony, *pendente lite* unless cause to the contrary be shown on or before the 16"

day of February 1928, provided a copy of this Order be served on the said defendant

Aaron Young on or before the 8"

day of February 1928.

Eugene O'Dunne

TRUE COPY—TEST:

CLERK

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this 18 day of June 1928, that the time for showing cause under said Order be extended to the 3 day of July 1928, and the time for service of a copy of the same be extended to the 25" day of June 1928.

Eugene O'Dunne

B Docket 46 ✓
1928

CIRCUIT COURT.

Hattie Young

vs.

Aaron Young

Baltimore City Jail

Order for Alimony

Pendente Lite

ORDER

B No. 32679

(3) 1376

Fd:

11

101 Feb 1928
18 June 1928

Now Est

John E. Potee

John E. Potee Sheriff

Served on Aaron Young on the 20th day of June 1928 in the presence of

John Morgan

John E. Potee Sheriff

Dec 1075

FEB 2 1928 10 36 AM
THE SHERIFF'S OFFICE FM

CIRCUIT COURT

BALTIMORE CITY