

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

*B 180
1928*

BERTIE DABNEY

VS.

ROBERT NOLAND DABNEY
2326 Hunter St.

B32941

BILL FOR DIVORCE.

B 32941

Mr. Clerk:-

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

Fd 19 May 1928.

BERTIE DABNEY : IN THE CIRCUIT COURT

VS. : OF

ROBERT NOLAND DABNEY : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

- (1) That she was married to her husband, Robert Noland Dabney on the 18th day of September, 1918 in Baltimore City, and with whom she resided until the 17th day of April, 1924 when the defendant deserted the plaintiff.
- (2) That though the conduct of your Oratrix toward the said defendant has always been kind, affectionate and above reproach, he has, without any just cause or reason, abandoned and deserted her and has declared his intention to live with her no longer and said abandonment has continued uninterruptedly for more than three years and is deliberate and final and the separation of the parties is beyond any reasonable expectation of reconciliation.
- (3) That your Oratrix has not lived or co-habited with the said defendant since said desertion.
- (4) That there is one child born as result of said marriage Roman Dabney, age six years for whom the plaintiff asks the custody.
- (5) 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 Robert Noland Dabney.

(b) That she may have the care and custody of their son Roman Dabney.

(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 Writ of Subpoena directed against the said Robert Noland Dabney, 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.



ATTORNEYS FOR PLAINTIFF

FILED AT
COURT OFFICE ON

JUN 11 11 55 AM

P 728

Ct. Ct.

B-180

192 8

Docket No.

Bertie Dabney

vs.

Robert Noland Dabney

2326 Hunter St

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B-32941

(2)

(3)

Filed

11 June, 192*8*
9 July 192*8*
Davis & Hyans

SOLICITOR

19

*non Est
(Beechler)*

*John E. Pyle
Shuff
6/11 8*

*July
Chas R Whitford*

*John E. Pyle
Shuff*

*non Est
(Dancy)*

REISSUED TO

EQUITY SUBPOENA

The State of Maryland

On Robert Noland Dabney
2326 Hunter Street

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 **June** next cause an appearance to be entered for you and your answer to be filed to the complaint of **Bertie Dabney** 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 **14th** day of **May** 192 **8**
Issued the **19th** day of **May**, in the year 192 **8**.

~~Clerk~~
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.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

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

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

To Robert Noland Dabney
2326 Hunter Street

Copy

REISSUED TO July 6/11 1928
Return Day, 1928
Chas R Whiteford
Clerk

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 **June** next cause an appearance to be entered for you and your answer to be filed to the complaint of **Bertie Dabney** 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 **14th** day of **May** 192**8**
Issued the **19th** day of **May**, in the year 192**8**.

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.