

IN THE CIRCUIT COURT OF

BALTIMORE CITY

B 196
7928

ROBERT C. JONES

VS.

MYRTLE JONES

2341 S. Clinton St
"Restaurant"

BILL FOR DIVORCE.

B32967

Mr. Clerk:

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS

ATTORNEYS AT LAW

Filed 31 May 1928

ROBERT C. JONES

:

IN THE CIRCUIT COURT

VS.

:

OF

MYRTLE JONES

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

1. That he was married to his wife, Myrtle Jones on or about the 15th day of February, 1926 and with whom he resided until on or about the 6th day of January, 1928.
2. That ever since said marriage your Orator has behaved himself as a faithful, chaste and affectionate husband toward the said Myrtle Jones.
3. That the said Myrtle Jones has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned men, whose names are unknown to your Orator and said offense has not been condoned by your Orator.
4. That there are no children born as result of said marriage.
5. That your Orator has not lived or co-habited with the said defendant since he discovered her said adulteries.
6. That both your Orator 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.
7. That your Orator and the respondent are owners of 2333 Ivy Avenue, Morgan Park, as tenants by the entireties. That by virtue of the above and other irreconcilable differences, the parties to this suit are unable to arrive to any reasonable common understanding as to the use, enjoyment or disposition of the aforementioned joint property. That the said property was purchased for \$7200.00; that \$2800.00 have been paid on the

said property. That your Orator has been forced to contribute solely all amounts necessary for the repair and upkeep of the aforementioned property because the respondent has discontinued any contributions on account of the weekly installments due on the mortgage for the balance of purchase money of aforementioned joint property.

TO THE END THEREFORE, YOUR ORATOR PRAYS:

- (a) That he may be divorced A Vinculo Matrimonii from the said Myrtle Jones.
- (b) That a receiver or receivers may be appointed by this Honorable Court to take charge of all the joint property 2333 Ivy Avenue in order to properly preserve same during the pendency of this suit.
- (c) That a Trustee may be appointed with power and authority to sell same property and out of the proceeds realized, to reimburse your Orator for the amounts expended by him on account of repairs, improvements, mortgage loan or any other expenditure made by your Orator on account of said joint property; then to divide the balance remaining, after payment of legal charges and costs, between your Orator and the respondent
- (d) Such other and further relief as his case may require.

May it please your Honor to grant unto your Orator the Writ of Subpoena directed against the said Myrtle Jones commanding and requiring her to be and appear in this Court on come 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.

Adams & Evans

PLAINTIFF

SOLICITOR FOR PLAINTIFF.

STATE OF MARYLAND, BALTIMORE CITY, to wit:

I HEREBY CERTIFY, that on this day of May, in the year one thousand nine hundred and twenty eight, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared Robert C. Jones and made oath in due form of law that the matters and facts in the foregoing Bill of Complaint are true to the best of his knowledge and belief.

AS WITNESS my hand and Notarial Seal.

NOTARY PUBLIC

P714

Ct. Ct.

B-196

192 8

Docket No.

Robert C. Jones

vs.

Myrtle Jones

2341 Chilton St.

SUBPOENA TO ANSWER BILL OF COMPLAINT

rw

No.

B-32967

(2)

Filed

9 June

1928

Davis & Evans

SOLICITOR

7

*Summoned and a copy the
Process left with the Defendant.*

*Beegan
(6/14/28)
John C. Potee
Sheriff.*

New \$0.95

RECEIVED

EQUITY SUBPOENA

The State of Maryland

On Myrtle Jones,

2341 S. Clinton St. (Restaurant)

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

Robert C. Jones 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 1928 Issued the 31st day of May, in the year 1928.

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.

IN THE
CIRCUIT COURT NO.
BALTIMORE CITY

196
B 1958

ROBERT C. JONES

VS.

MYRTLE JONES.

PETITION FOR
ALIMONY AND COUNSEL FEE.

B32967
(3)

Mr: Clerk:

Please file &c.,

Roy S. Bond

Solicitor for Petitioner.

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

FILED

21 - June 1928

ROBERT C. JONES

IN THE CIRCUIT COURT

VS.

OF

MYRTLE JONES.

BALTIMORE CITY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

Your Petitioner- MYRTLE JONES-- respectfully represents unto your Honor:

(1). THAT HERETOFORE, a bill for divorce- A Vinculo Matrimonii, has been filed against her in this Honorable Court charging your petitioner with the crime of adultery.

(2). THAT THE SAID BILL OF COMPLAINT is without foundation as will be shown at the time of the trial.

(3). THAT SHE IS ADVISED by Counsel that she is entitled to alimony, pendente lite and a further sum to compensate her solicitor for his services in this case. That her husband has informed her that he is a manager of a Road House in Catonsville, Maryland, that does a good business and as such he is capable of making and she verily believes he does make not less than FIFTY (\$50:00) DOLLARS, per week, and that she is a poor woman and has no income with the exception of what little money she derives from a small lunch-room business, from which she does not receive sufficient to meet her daily obligations.

WHEREFORE your Petitioner prays:

~~-a-~~ That an order be issued out of this Honorable Court, allowing her alimony, pendente lite and Counsel fee in such sums as this Honorable Court may deem just and proper and further that the order be served upon her husband the said Robert C. Jones, or his Solicitors Davis & Evans, 215 St. Paul Street.

-b- Permanent alimony--

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

AS IN DUTY BOUND, etc.,

Myrtle Jones
Petitioner.

Ray Bond
Solicitor for Petitioner.

STATE OF MARYLAND
BALTIMORE CITY - to wites

I HEREBY CERTIFY that on this ^{20th} day of June,
1928, before me, the subscriber, a Notary Public of the State of
Maryland, in and for Baltimore City, personally appeared- MYRTLE
JONES, Petitioner, and made oath in due form of law that the matter
and facts set forth in this her petition are true to the best of
her knowledge and belief.

AS WITNESS MY HAND and Notarial Seal.

Cleora S. Stigler
NOTARY PUBLIC.

Serve on
Davis & Evans, Sol..

Docket 196
1928

Circuit Court

ROBERT C. JONES

VS.

MYRTLE JONES

Order Counsel Fee and Alimony

Pendente Lite

No. B-32967
(4)

Fd 25 June 1928
m

RECEIVED AT
THE SHERIFFS OFFICE ON
JUN 25 1928 4 15 PM

*Copy of the within Order of Court served on
Davis and Evans Solicitor on the 26th day
of June 1928 in Presence of Adam & Buch
Jury & Coffey
Jee P. P. S.
Merritt*

ROBERT C. JONES

vs.,

MYRTLE JONES

—IN THE—

CIRCUIT COURT

—OF—

BALTIMORE CITY

MAY TERM

ORDERED BY THE COURT this 25th day of JUNE 1928

that the Plaintiff Robert C. Jones

pay to the Defendant Myrtle Jones

the sum of Fifty Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of Sixteen

Dollars per week, during the continuance of this suit, to the said Defendant Myrtle Jones

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 10th

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

Robert C. Jones on or before the 2nd

day of July 1928

Eugene O. Dunn

TRUE COPY—TEST:

CLERK

196-1928

In The Circuit Court
of

Baltimore City

Robert Jones B 196
vs 1928.

Meytha Jones

Answer to petition

Mr Clerk Please file

Mein & Son
B 32967
57

DAVIS & EVANS
ATTORNEYS AT LAW

Filed 11 July 1928

ROBERT C. JONES

:

IN THE CIRCUIT COURT

VS.

:

OF

MYRTLE JONES

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The petitioner, Robert C. Jones, denies that he earns the amount as stated in the petition of Myrtle Jones and avers that he is unable to pay the amount as ordered by this Court on the 25th day of June, 1928.

WHEREFORE your petitioner prays that the decree be dismissed with costs.

Reis & Evans

ATTORNEYS FOR PETITIONER

B196
1928 B- No. 68 Docket

Ct. Ct.

Robert C. Jones

vs.

Myrtle Jones.

MOTION FOR HEARING

B 32967
(6)

No.

Filed *19* day of *Jan* 192*9*

Davis and Evans

Roy S Bond

Robert C. Jones

vs.

Myrtle Jones.

IN THE

CIRCUIT COURT

No. 2

OF

BALTIMORE CITY

The Respondent, Myrtle Jones by Roy S. Bond,

her Solicitor, applies to have the above entitled cause placed on the Trial Calendar
for hearing on the question of alimony and Counsel fee,

in conformity with the First Equity Rule.



Solicitor for Respondent.

Serve on

Davis & Evans *Service admitted*

J. Steward Davis
1-28-29.

Ct. Ct.

196

1928

No. B-68

Docket

Jones

vs.

Jones

NOTICE OF HEARING

B- No. 32967

(7)

No.

Filed 19 day of Jan. 1929

copy of the within Notice of Hearing served on J. Steward
Davis, on the 28th day of January 1929 in presence
of Albert E. Beecher

Geo P. P.

John E. Bates
Attorney

JAN 21 1929 11 49 AM

RECORDED &
INDEXED
THE SHERIFF'S OFFICE

W

1929

Robert C. Jones

vs

Myrtle Jones

IN THE

CIRCUIT COURT

OF BALTIMORE CITY

Upon application made by the Solicitor for the _____

Respondent _____

the above entitled cause has been placed upon the trial calendar in
accordance with the provisions of the First Equity Rule, and the
same will stand for hearing on Alimony and Counsel fee _____

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

196
Circuit Court

B196

1928. **B**

No.

Docket

Robert Jones

VS.

Myrtle Jones.

Final Order, Counsel Fee and Alimony
Pendente Lite.

No. 32967 B

(8)

Filed

4th Feb

19

29

IN THE
Circuit Court
OF
BALTIMORE CITY.

Robert Jones

VS.

Myrtle Jones.

Term, 19.....

This cause coming on to be heard upon the petition for Alimony **pendente lite** and Counsel fee, and the answer thereto, and testimony taken, and having been submitted by the solicitors for the respective parties;

Ordered by the Circuit Court of Baltimore City this 4th day
of February, 1929, that the.....
..... pay to the.....
..... the sum of..... Dollars, as counsel fee
for the Solicitor of the..... and that he
further pay the sum of..... Dollars per week,
to the said.....
as Alimony **pendente lite** accounting from the..... day of..... 19.....
and continuing until the..... day of..... 19..... (should this suit be
so long pending) or until the further order of this Court.

Petition for alimony and Counsel fee be dismissed by agreement of Counsel, the same having been approved by this Honorable Court.

J. Stewart Dawson

Attorney for Plaintiff

Wm. P. Bond

Wm. P. Bond

Attorney for Defendant.