

*B 615
1926*

IN THE
CIRCUIT COURT NO. 2
BALTIMORE CITY.

DOLBERT S JACKSON

VS

MAMIE JACKSON.

*515 Mosher St -
40 Dr. Soms Carr -*

Bill for Divorce-

--A VINCULO MATRIMONII--

7027419 B
Mr Clerk:

Please file &c.,

Roy S. Bond

Sol. for Plaintiff.

ROY S. BOND
ATTORNEY AT LAW
220 ST. PAUL PLACE
BALTIMORE. MD.

FILED *17th* August 1926

DOLBERT S. JACKSON

IN THE

VS.

--CIRCUIT COURT NO. 2--

MAMIE JACKSON

BALTIMORE CITY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

Your Orator- Dolbert S. Jackson complaining, respectfully says:

(1) That ~~he~~ was married to his wife, Mamie Jackson, in Baltimore City, State of Maryland, on or about the 15th day of January, 1904, with whom he resided until on or about the 16th day of October, 1914.

(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, Mamie Jackson, 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- MAMIE JACKSON-
- b- Such other and further relief as the case may require.

MAY IT PLEASE YOUR HONOR, to grant unto
your Orator- Dolbert S- Jackson, the writ of subpoena, directed
unto the said defendant- Mamie Jackson, residing- 515 Mosher Street--
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.,



Sol. for Plaintiff--

P 349

Ct. Ct. No. 2

615
192 6

Docket No.

Jackson
vs.

Jackson
315 Mosher et
Subpoena to Answer Bill of Complaint

1-Pro ✓

No. 27419 B
2

Copy - copied

Filed 26 - August 1926
Roy S. Bond
Solicitor.

11

Summured and a copy of Process left
with the defendand
Lycett
(8/20/26)
Fees \$0.80
John E. Potes
Sherry

EQUITY SUBPOENA

The State of Maryland

To

Marnie Jackson
515 Mosher St
% Dr. Wm Carr

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

Robert S. Jackson

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 12th day of July, 1926
Issued the 17th day of August, in the year 1926

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.)

IN THE CIRCUIT COURT NO. 2

OF

615 BALTIMORE CITY.
1926 *35 B*

DOEBERT S. JACKSON

VS.

MAMIE JACKSON

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

No 27419 B
3

Davis & Evans
ATTORNEYS FOR RESPONDENT.

DAVIS & EVANS
ATTORNEYS AT LAW

Sept 14th September 1926

DOEBERT S. JACKSON

:

IN THE CIRCUIT COURT NO.2

VS.

:

OF

MAMIE JACKSON

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the Bill of Complaint in the above entitled case, respectfully says:

- I. That she admits the allegations contained in the first paragraph of the Bill of Complaint.
2. That she admits the allegations contained in the second paragraph of the Bill of Complaint.
3. That she denies with great emphasis the allegations contained 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.
5. Your respondent further states that she is without means of defraying the expenses of this suit and that the plaintiff is employed earning thirty-five dollars per week; and that she is advised by counsel that she is entitled to petition this Honorable Court to issue an order awarding her a sum to compensate her solicitor.

WHEREFORE YOUR RESPONDENT PRAYS:

- (a) Counsel fee.
- (b) That the Bill of Complaint be dismissed with costs to the plaintiff.

AND as in duty bound, etc.

Davis T Evans
ATTORNEYS FOR RESPONDENT.

Mary E. Jackson.

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this *9th* day of September, in the year one thousand nine hundred and twenty six, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City aforesaid, personally appeared *Mary E.* Jackson and made oath in due form of law that the matters and facts stated in the above petition are true to the best of her knowledge and belief.

AS WITNESS my hand and Notarial Seal.

Allen C. Fisher

NOTARY PUBLIC.

Serve on

Roy S Bond

220 Spaul place

Service Admitted

Dec 10, 24

Roy S Bond

172 ✓ 59.
615
1926 Docket No. B35

Robert S Jackson

vs.

Manuel Jackson

H

PETITION AND ORDER TO TAKE TESTIMONY UNDER 30TH RULE.

No. 27419 B

H

Copy Copied

Filed 8 Dec 24, 1926

H

Copy of the within Petition and Order of Court served on Roy S Bond, Solicitor on the 10th day of December, 1924, in the presence of Louis Hecht.

John E. Foley Sheriff

Fees \$0.50

Dolbert S Jackson

vs.

Mamie Jackson

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

To the Honorable, the Judge of the
Circuit Court No. 2 of Baltimore City:

Defendant
The ~~Plaintiff~~ in this case respectfully shows unto your Honor

That he desires to examine orally, in open Court and in the presence of your Honor, certain witnesses who can testify to the facts and matters relevant to the allegations in the Bill of Complaint filed in this case.

Your Petitioner therefore prays your Honor to pass an order, according to the Statutes for such cases made and provided.

And as in duty bound will ever pray.

Davest Evans

Solicitor for ~~Plaintiff~~

Defendant

Upon the foregoing Petition and Application it is this *9th* day of *December*

A. D. 192*6*, Ordered that the Petitioner have leave to take testimony as prayed and that the testimony to be offered be taken as required by the 30th Rule of this Court. And it is further Ordered that a copy of this Petition and Order be served on the

Plausiff

or h/s Solicitor, on or before the *13th* day of *December*, 192*6*

Charles F. Steen

IN THE
CIRCUIT COURT NO. 2-
BALTIMORE CITY.

DOLBERT S. JACKSON

VS.

MAMIE JACKSON.

DOLBERT S. JACKSON

IN THE

VS.

-CIRCUIT COURT NO. 2-

MAMIE JACKSON

BALTIMORE CITY.

MR: CLERK:

PLEASE ENTER MY APPEARANCE FEE PAID
IN THE ABOVE ENTITLED CASE TO THE EXTENT
OF NINE DOLLARS.

Paris Lewis

SOLICITOR FOR DEFENDANT.

B 615
1926

Jackson

"

Jackson

Ordway Disposal

No 27419 B.

By 7 January 1927

DOLBERT S. JACKSON

IN THE

VS.

--CIRCUIT COURT NO. 2--

MAMIE JACKSON

BALTIMORE CITY.

MR: CLERK:

PLEASE DISMISS THE ABOVE ENTITLED

CASE BY ORDER OF THE PLAINTIFF.

Wolbert S. Jackson
PLAINTIFF:

Ray Bond
SOL. FOR PLAINTIFF:

Handwritten note on right margin: "By J. J. [unclear] 1/11/1911"

Handwritten notes in center: "Dolbert S. Jackson", "Mamie Jackson", "Ray Bond", "1/11/1911"

Handwritten notes on left margin: "Dolbert S. Jackson", "Mamie Jackson"