

B 948 / 1926

IN THE --
CIRCUIT COURT NO. 2
--BALTIMORE CITY.

ARTHUR ROBERTS

VS.

LENA ROBERTS.

- 1115 -

-Bill for Divorce-

-A VIUCIO MATRIMONII-

No 27677 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

28 September 1926

ARTHUR ROBERTS

IN THE

VS.

--CIRCUIT COURT NO. 2--

LENA ROBERTS

BALTIMORE CITY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

Your Orator- Arthur Roberts complaining, respectfully says:

(1) That he was married to his wife, Lena Roberts, at Hampton, Virginia, on or----- about the 2nd day of March,----1916, with whom he resided until on or about the 20th day of May, 1923.

(2) That the defendant, Lena Roberts, is a resident of Baltimore City, State of Maryland, and has been for more than two years last past.

(3) That though the conduct of your Orator towards his said wife, Lena Roberts, has been kind, affectionate and above reproach in all respects, the defendant 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, LENA ROBERTS-
- b- Such other and further relief as the case may require.

MAY IT PLEASE YOUR HONOR, to grant unto
your Orator, Arthur Roberts, the writ of subpoena, di-
rected unto the said Defendant, Lena Roberts, residing-
1115 Harlem Avenue, 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.,

A handwritten signature in cursive script, appearing to read "R. M. Bond", written over a horizontal dashed line.

SOL. FOR PLAINTIFF.

P 395

Ct. Ct. No. 2

749
1926

B

Docket No. 358

Roberts

vs.

10-6-26

Roberts

1115 Harlem

Subpoena to Answer Bill of Complaint

RW

No. 27677 B

Copies Copied

Filed 11th October, 1926

Ray A. Bond

Solicitor.

13

Summoned and a copy of the process left with the defendant.

John E. Patee
Sheriff

Yes \$0.80

(Keene
10-6-26)

11-11-26
11-11-26
11-11-26
11-11-26

EQUITY SUBPOENA

The State of Maryland

To

Lena Roberts

1115 - Harbor Ave

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 *October*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Arthur Roberts

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. CARTER, Chief Judge of the Supreme Bench of Baltimore City, the *14th* day of *September*, 19*26*
Issued the *28th* day of *September*, in the year 192*6*

John Perasanti

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

B749
1926

BALTIMORE CITY

ARTHUR ROBERTS

1337 N. Carey St.

VS.

LENA ROBERTS

No 27677 B

RESPONDENT'S ANSWER

Mr. Clerk: -

Please file.

Davis & Evans

ATTORNEYS FOR RESPONDENT
Serve on Guy S. Bond attorney
for defendant D.R.

DAVIS & EVANS

ATTORNEYS AT LAW

Id 16th October 1926

ARTHUR ROBERTS

:

IN THE CIRCUIT COURT NO. 2

VS.

:

OF

LENA ROBERTS

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the bill of complaint in the above entitled cause, respectfully says:

1. That she admits the allegations contained in the first paragraph of the plaintiff's bill of complaint.
2. That she admits the allegations contained in the second paragraph of the plaintiff's bill of complaint.
3. That she denies with great emphasis the allegations contained in the third paragraph of the bill of complaint and further says that the plaintiff and not the defendant is guilty of desertion.
4. That she admits the allegations contained in the fourth paragraph of the plaintiff's bill of complaint.
5. Your respondent further says that she is destitute and without the proper funds for her defense to this suit and that she is advised by counsel that she is entitled to petition this Honorable Court for alimony pendente lite for the support of herself and a reasonable sum as counsel fee to compensate her solicitor. The plaintiff is employed and earns sixty dollars per week.

WHEREFORE YOUR RESPONDENT PRAYS:

- (a) That the bill be dismissed with cost to the plaintiff.
- (b) Alimony pendente lite.
- (c) Permanent alimony.
- (d) Counsel fee.
- (e) Such other and further relief as the case may require.

AND as in duty bound, etc.

David Swan

ATTORNEYS FOR RESPONDENT.

Serve on
Arthur Roberts
1337 W. Carey St

449/1926 B Docket 35

CIRCUIT COURT No. 2

Roberts

vs.

Roberts

Order Counsel Fee and Alimony
Pendente Lite
Husband Plaintiff

ORDER

No. 27677 B.

(4)

Copies Copied

Filed 18 October 1926

*John C. Porter
Sheriff*

*Now Clerk
(Krylowich)*

14

Arthur Roberts

IN THE

CIRCUIT COURT No. 2

vs.

OF

Lena Roberts

BALTIMORE CITY

September, TERM, 1926

ORDERED BY THE COURT, this *18* day of *October* 1926

that the Plaintiff *Arthur Roberts*

pay to the Defendant *Lena Roberts*

the sum of *fifty* Dollars as Counsel Fee for the

Solicitor of the Defendant, and that he further pay the sum of *twenty*

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

Lena Roberts

as Alimony, pendente lite, unless cause to the contrary be shown on or before the *3rd*

day of *November* 1926, provided a copy of this Order be served on the said Plaintiff

Arthur Roberts on or before the *3rd*

day of *October* 1926 *Richard F. Allen*

TRUE COPY—TEST:

Boyerwick
do Clerk

Clerk.

B Docket *749*
1926

CIRCUIT COURT No. 2

Roberts

vs.

Roberts

Order Counsel Fee and Alimony
Pendente Lite
Husband Plaintiff

ORDER

No. *Copy* B.
()

Arthur Roberts

IN THE
CIRCUIT COURT No. 2

vs.
Lena Roberts

OF
BALTIMORE CITY

September, TERM, 1926

ORDERED BY THE COURT, this *18* day of *October* 1926

that the Plaintiff *Arthur Roberts*

pay to the Defendant *Lena Roberts*

the sum of *fifty* Dollars as Counsel Fee for the

Solicitor of the Defendant, and that he further pay the sum of *twenty*

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

Lena Roberts

as Alimony, **pendente lite**, unless cause to the contrary be shown on or before the *3rd*

day of *November* 1926, provided a copy of this Order be served on the said Plaintiff

Arthur Roberts on or before the *23*

day of *October* 1926

Charles F. Stein

TRUE COPY—TEST:

John Pleasants
Clerk.

Serve on

Roy S Bond et al
220 St Paul place
Jan 3 1927
Roy S Bond

65 ✓ 22
Circuit Court No. 2
749
1926 Docket No. B 35

Arthur Roberts

vs.

Sena Roberts

PETITION AND ORDER TO TAKE
TESTIMONY UNDER 30TH RULE.

No. 27677 B

Copied - Copied

Filed 3 January, 1927

Copy of the within Petition and Order of Court served on
Roy S. Bond, Solicitor on the 3rd day of January, 1927,
in the presence of Louis Hecht.

John E. Folee
Jes \$0.50 Sheriff

JAN 5 1927 10 38 AM

RECEIVED AT
THE SHERIFF'S OFFICE ON

220
St Paul

Arthur Roberts

vs.

Sena Roberts

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.

J. Evans
Solicitor for ~~Plaintiff~~ *Defendant.*

Upon the foregoing Petition and Application it is this *3rd* day of *January*

A. D. 192*7*, 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

Trainor
gm
or his Solicitor, on or before the _____ day of *January*, 192*7*

Charles F. Brown