

IN THE CIRCUIT COURT

OF

B 537
1920

BALTIMORE

CITY.

William T. Bagwell,

vs.

Edith Bagwell

Bill for Divorce
a vinculo

Mr. Clerk, please file.

Davis & Bishop
Solicitors for
Complainant.

B21510

DAVIS & BISHOP
ATTORNEYS AT LAW
118 E. LEXINGTON STREET
BALTIMORE, MD.

Sept 1920

May it please Your Honor to grant unto Your Orator a Writ of subpoena, directed unto the said Respondent, commanding her to be or appear in this Court on some day certain, to be named therein, to perform such decree as may be passed in the premises.

As in duty bound etc.

William L. Bagwell
Complainant

Turner & Bushong
Solicitors for Complainant.

Equity Superior Court
The State of Maryland

291
537 *plea*
192 Ct. Ct.
 Docket No.

Bagwell
Bagwell

SUBPOENA TO ANSWER BILL OF COMPLAINT

Put
No. *B* 21510
(2)

1509 W. Harmount
Charmelle Street
Filed *Sept 7 1920*
Dorst Bishot *pt*
SOLICITOR

13

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

(Zorley)
9-7-20

Thomas F. M. Mully
Sheriff

Fees \$0.80

EQUITY SUBPOENA

The State of Maryland

To

Edith Engwell

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said City, on the second Monday of *September* 1920, to answer the complaint of

William J. Engwell

against you in said Court exhibited.

HEREOF fail not, as you will answer the contrary at your peril:

WITNESS, the honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *12* day of *July* 1920

Issued the *4* day of *September* in the year 1920

Chas R Whiteford

Clerk.

Notice to the person summoned:

"Personal attendance in Court on the day named in the above writ is not required; but unless within fifteen (15) days after the return day, legal defense is made in the above mentioned suit a Judgment by default may be entered against you."

B 537
1920

IN THE CIRCUIT COURT
- OF -
BALTIMORE CITY.

William T. Bagwell

VS.

Edith Bagwell.

-ANSWER.-

Mr. Clerk: ---

B 21510

Please file &c.,

(3)

Roy S. Bond
.....
Sol. for Defendant.

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

FILED 24th Sept 1920

*
*
William T. Bagwell

VS.

Edith Bagwell

*
*
IN THE CIRCUIT COURT
-OF-
BALTIMORE CITY.

-TO THE HONORABLE, THE JUDGE OF SAID COURT-

The Defendant in answer to the Bill of Complaint, before this Court exhibited respectfully says:

FIRST:

She admits she was married to her husband, on or about the 29th day of December 1914 by a Minister of the gospel. She neither admits nor denies that they were separated on the date named in the Bill of Complaint, but if the same be material to the merits of this case, she require strict and legal proof of same.

SECOND:

She admits the second and fifth paragraphs of the plaintiff's bill.

THIRD:

She denies that the conduct of her husband was kind, affectionate and above reproach, or that she has ever committed adultery and to the contrary says, she has always been a good, kind, affectionate, true wife to her husband and that he has been cruel to her and deserted her, rather than support her in keeping with her station in life.

FOURTH:

She in answer says that no offense has been committed for the plaintiff to condone.

Having answered all the material allegations of the Plaintiff's bill, the defendant prays that the same be dismissed and and that the plaintiff pay the costs.

As in duty bound, etc.,

.....
Sol. for Defendant.

my martyn dear sir
if you have any thing
in any line of work
you want done please
to drop me a card
white washing or cementing
or Plastering oblige
Thomas Bagwell
L.S. 110 312 n mount St

3/12/14/7

537
1970
B 537
1970
IN THE CIRCUIT COURT
-OF-
BALTIMORE CITY.

William T. Bagwell
3227 Mount St.

vs.

Edith Bagwell.

PETITION.

Mr. Clerk:---

B 21510
(4)

Please file &c.,

Roy S. Bond
Sol. for Defendant.

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

FILED 24" Sept 1970

William T. Bagwell

VS.

Edith Bagwell

IN THE CIRCUIT COURT
-OF-
BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

Petition of Edith Bagwell, defendant for Alimony,
Pendente Lite, and Counsel fee.

FIRST: That on or about the ^{4th} day of *September* 192*0*,
a bill for divorce, A Vinculo Matrimonii, was filed against the
said defendant charging her with adultery and that the allega-
tions contained in the said Bill of Complaint are untrue and
without foundation.

SECOND: Your Respondent further in answer says that
she is a poor woman unable to provide for her own maintenance
and support and that she has no money with which to meet the bur-
den of costs, which has been brought upon her by reason of the
filing of the Plaintiff's Bill of Complaint, that she is frail,
delicate, and sickly because of her husband's unpardonable treat-
ment towards her, and that he the said plaintiff is a man of
means working as a Mechanic, at Smith's Garage, Register St.,
and that he is steadily making about Thirty (30) Dollars, per
week; and your Respondent is advised by Counsel, that she is en-
titled to have an order passed by this Honorable Court to award
her a certain sum as alimony during the progress of this suit,
and a further sum to compensate her solicitor for his services
in the same, and that she might be prepared to meet the issue,
and prove the utter untruthfulness of the charge with which she
has been so falsely and unjustly charged.

WHEREFORE YOUR RESPONDENT PRAYS:

- a- That an order be passed allowing her alimony,
pendente lite, and Counsel fee in such sums
as this Honorable Court may think just and proper.
- b- Such other and further relief as the case may
require.

As in duty bound, etc.

R. M. Bond
Solicitor for Defendant

Mrs. Edith Bagwell
Defendant.

State of Maryland
Baltimore City -to wit

I hereby certify that on this ^{21st} day of September, 1920, before me the subscriber, a Notary Public, of the State of Maryland, in and for Baltimore City, personally appeared Edith Bagwell, petitioner in the foregoing cause, and made oath in due form of law, that the matter contained therein, is true to the best of her knowledge and belief.

As witness my hand and Notarial Seal.

Eleanor J. Wright
NOTARY PUBLIC.

Docket 537
1970

Circuit Court

Bagwell

vs.

Bagwell

Order Counsel Fee and Alimony

Pendente Lite

No. 21510

\$30 a week (M)
Roy S Bond

fd 30" Sept 1970
13

Now Est.
Thomas J. W. Hulley
(Brooks)
(Sheriff)

Remover
William J. Bagwell
327 N. Mount St

William J. Bagwell

vs.

Edith Bagwell

-IN THE-

CIRCUIT COURT

-OF-

BALTIMORE CITY

Sept TERM

ORDERED BY THE COURT this 30th day of September 1920

that the Plaintiff William J. Bagwell

pay to the Defendant Edith Bagwell

the sum of Twenty Five Dollars as Counsel Fee for the

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

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

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 15th

day of October 1920, provided a copy of this Order be served on the said Plaintiff

William J. Bagwell on or before the

day of October 1920

Robert J. Stanton

TRUE COPY--TEST:

CLERK

Docket.....

Circuit Court

Bagwell

vs.

Bagwell

Order Counsel Fee and Alimony

Pendente Lite

No.

copy

William D. Bagwell

vs.

Edith Bagwell

-IN THE-

CIRCUIT COURT

-OF-

BALTIMORE CITY

Sept TERM

ORDERED BY THE COURT this 30 day of September 1920

that the Plaintiff William D. Bagwell

pay to the Defendant Edith Bagwell

the sum of Twenty Two Dollars as Counsel Fee for the

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

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

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 15

day of October 19 , provided a copy of this Order be served on the said Plaintiff

William D. Bagwell on or before the 8

day of October 1920.

Robt. F. Stanton

TRUE COPY-TEST:

Leah R. Whiteford

CLERK