

3/12/63

In the Circuit
Court of Berkeley
City

—
Iris Baird

vs

Julian Baird
—

Bill for Divorce
Annulled, Matrimonial

—
Not Clerk please file

B19672

417 (2)

J. Stewart Davis atty
118 E. Lexington St.

Iris Baird

In The Circuit Court of

Vs.

Julian Baird

Baltimore City.

To The Honorable, The Judge of Said Court:

Your Oratrix, complaining, respectfully says:

FIRST, That the parties hereto were married in New York City, New York state, on or about the 18th. day of February, 1910, and lived together as man and wife until on or about the 14th. day of September, 1913.

SECOND, That Your Oratrix is a resident of the city of Baltimore, state of Maryland, and has been for more than two years prior to the filing of this Bill of Complaint. That the defendant is a non-resident of the city and state and when last heard of, was in New York City, New York.

THIRD, That though the conduct of Your Oratrix towards her husband has always been kind, affectionate, and above reproach, he, without any just cause or reason abandoned and deserted her, and has declared his intentions to live with her no longer; that such abandonment has continued uninterrupted for more than three years, prior to the filing of this Bill of Complaint; and was deliberate and final, and beyond any reasonable hope or expectation of reconciliation.

FOURTH, That Your Oratrix has never condoned nor forgiven the said desertion, that she has never co-habited with the said respondent since the said desertion.

FIFTH, That there is one minor child, Mabel, living as the result of said marriage.

WHEREFORE YOUR ORATRIX PRAYS:

- a- A divorce a vinculo matrimonii from the defendant.
- b- The care and custody of said minor child.
- c- Such other and further relief as the case may require.

May it please Your Honor, to grant unto Your Oratrix, an order of publication, setting forth the nature and substance of this Bill and warning the said defendant to be in this Court in person or appear by solicitor on or before a certain day to be therein named and show cause, if any he may have why a decree should not be passed as prayed.

As in duty bound etc.

Iris Baird
Complainant

P. Howard Davis
Solicitor for Complainant.

State of Maryland)
) To Wit
Baltimore City)

I hereby certify that on this 24th day of July 1919, before me the subscriber, a Notary Public in and for Baltimore ^{County} City, State of Maryland, personally appeared Iris Baird, the complainant in the foregoing Bill and made oath in due form of law that the matter contained in the same was true to the best of her knowledge and belief.

Arthur H. Rogers
Notary Public.

J. Steward Davis, Solicitor

118 E. Lexington St.

In The Circuit Court of Baltimore City

Iris Baird Vs. Julian Baird.

ORDER OF PUBLICATION.

The object of this suit is to procure a decree for a divorce ~~A Vincul Matrimonii~~, by the plaintiff from the defendant.

The Bill states that the parties thereto were married in New York City, state of New York on or about the 18th. day of February, 1910, and lived together as man and wife until on or about the 14th day of September, 1913. That the plaintiff is a resident of the city of Baltimore, state of Maryland and has been for more than two years prior to the filing of this bill of Complaint. That the defendant is a non-resident of this City and State, and when last heard of was in New York City, New York. That though the conduct of the plaintiff towards her husband was always kind and affectionate and above reproach; he, without just cause or reason, abandoned her, and has declared his intentions not to live with her anymore; that the abandonment has continued uninterrupted for more than three years prior to the filing of this Bill of Complaint; and the separation of the parties is beyond any reasonable hope or expectation of reconciliation. That there is one minor child, whose care and custody the plaintiff prays

It is thereupon by The Circuit of Baltimore City, ordered this ²⁸ day of July 1919. that the plaintiff by causing a copy of ~~##~~ this order to be inserted in some daily newspaper, published in the city of Baltimore, once a week for four successive weeks, before the ~~28~~ day ^{August} 1919. and give notice to the said defendant, Julian Baird (now absent) of the object and substance of this Bill ~~and~~ warning him to be and appear in this Court in person or by Solicitor, on or before the 13 day ^{Sept} 1919. to show cause if any he may have, why a decree should not be passed, as prayed.

James P. Gorter