

In Circuit Ct
of 757
Baltimore City

James Baulman

vs

Reona Baulman

Divorce & Maintenance

Writ (Ct. please file)

(Semi) Jano

B 20739

(1)

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BALTIMORE, MD

At 2 months 1919

937 10md 1700 are

James E. Bantum

In The Circuit Court

Vs.

of

Leonia Bantum

Baltimore City.

To The Honorable, The Judge of Said Court:

Your Orator, complaining, respectfully says:

FIRST, That the parties hereto were married on or about the 9th. day of April-1917 and lived together as man and wife until on or about November 11, 19 19. They were married by Rev. Father George A. Griffith. Said marriage occurred in Baltimore City, State of Maryland.

SECOND, That Both Parties are residents of this 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 respondent is a resident of this city.

THIRD, That though the conduct of Your Orator towards his wife has always been kind, affectionate, and above reproach, she without any just cause or reason, caused your orator to leave the said defendant because of the defendant's extremely cruel and barbarous treatment; That the said Leonia Bantum has upon several times cut your orator with knives; That she has bit him with her teeth; that she has used language of profane nature publicly when addressing your orator upon several occasions; that as a result of these several assaults your orator has been compelled to receive medical treatment upon more than one occasion; that her acts were deliberate and committed without his procurement/ connivance and consent and that he has never lived with his wife or condoned the offense since the day of separation, and that there is no reasonable hope or expectation of a reconciliation.

FOURTH, That there are no children born as a result of said marriage Therefore YOUR ORATOR PRAYS:

a-a A divorce a mensa et thoro from the respondent.

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

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

As in duty bound etc.

James E. Bantum
Complainant

Frank Davis

Solicitor for Complainant

State of Maryland)
) To Wit
Baltimore City)

I hereby certify that on this 12th day of Nov. 1919, before me the subscriber, a Notary Public in and for the ^{County} ~~city~~ of Baltimore, State of Maryland, personally appeared James E. Bantum, the complainant in the foregoing bill and made oath in due form of law that the matter contained therein was true to the best of his knowledge and belief:

Arthur H. Rogers

Notary Public.

75 B 59

Ct. Ct.

191

9

Docket No.

Bantum

Bantum
Per

SUBPOENA TO ANSWER BILL OF COMPLAINT

93 70 Mid Hill
No. 20. 239
(2)

Filed 19 Nov 1919
J Stewart Davis
SOLICITOR

*Summond and a copy of the Process left with the
Defendant
(Kelly) Fees 0.50. Thomas F. M. Multy
Sheriff*

EQUITY SUBPOENA

The State of Maryland

On

Leona Bantum

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 *December* 191*9*, to answer the complaint of

James E. Bantum

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 *18* day of *November* 191*9*

Issued the *13* day of *November* in the year 191*9*

Notice to the person summoned: *Chas. R. Whiteford* Clerk.

“Personal attendance in Court on the day named in the above writ is not required; but unless within such number of days thereafter as the law limits, legal defence is made in the above mentioned suit a Judgment by default may be entered against you.”

B 757
1919

3/12/1919

IN THE CIRCUIT COURT
OF BALTIMORE CITY.

James E. Bantum

425 N. Edder St.

vs.

Leonia Bantum.

Petition for Alimony
and Counsel fee.

B 20239

Mr. Clerk: (3)

Please file &c.,

Raymond
Solicitor for Defendant.
215 17 St. Paul Place.

fd 19 Nov 1919

James E. Bantum

VS.

Leonia Bantum

IN THE CIRCUIT COURT
OF
BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Petition of Leonia Bantum, defendant for Alimony
Pendente Lite, and Counsel fee.

FIRST: That on or about the 14th day of November 1919, a bill for a divorce, *A. Mensa Et Thoro* was filed against the said defendant, charging her with cruelty and vicious conduct and that the allegations 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 burden of costs, which has been brought upon her by reason of the filing of the plaintiff's Bill of Complaint, that she is a frail, delicate, and sickly because of her husband's cruel treatment towards her, and that the said plaintiff is a man of means, employed at the Coca Cola Building as a skilled laborer and that he is steadily employed at a wage of Fifteen Dollars (\$15), per week or more; that your Respondent is advised by Counsel that she is entitled 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 she will ever pray,

Leonia Bantum,
Defendant.

W. Bond,
Solicitor for Defendant.

State of Maryland *
Baltimore City *to wit*
*

I hereby certify that on this ^{17th} day of Nov. 1919 before me the subscriber, a Notary Public, of the State of Maryland, in and for Baltimore City, personally appeared Leonia Bantum, the petitioner, in the foregoing proceedings, and made oath in due form of law, that the matter therein contained, is true to the best of her knowledge and belief.

As witness my hand and Notarial Seal.

Carlos C. Jennings
Notary Public.

B59 Docket 757
1919

Circuit Court

Bartum

vs.

Bartum

425 M. Ecker st

Order Counsel Fee and Alimony

Pendente Lite

No. 20239

(4)

Roy Bond

fd 20 Nov 1919
3

now Est.
Thomas J. W. Gaulty
Sheriff
(Friedenstein)

James E. Santum
425 N. Eden St
vs.
Leonia Santum

-IN THE-
CIRCUIT COURT

-OF-
BALTIMORE CITY

Nov TERM

ORDERED BY THE COURT this *20* day of *November* 19 *19*

that the Plaintiff *James E. Santum*

pay to the Defendant *Leonia Santum*

the sum of *Twenty five* Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of *Five*

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

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the *4*

day of *December* 19 *19* provided a copy of this Order be served on the said Plaintiff

James E. Santum on or before the *28*

day of *November* 19 *19*

James P. Gorton

TRUE COPY—TEST:

.....
CLERK

Docket.....

Circuit Court

vs.

Order Counsel Fee and Alimony

Pendente Lite

No.

copy

James E. Bantum
425 N. Eden St.
vs.
Leonia Bantum

-IN THE-
CIRCUIT COURT

-OF-
BALTIMORE CITY

Nov TERM

ORDERED BY THE COURT this 20th day of November 1919

that the Plaintiff James E. Bantum

pay to the Defendant Leonia Bantum

the sum of Twenty & No Dollars, as Counsel Fee for the

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

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

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 4

day of December 1919, provided a copy of this Order be served on the said Plaintiff

James E. Bantum on or before the 28th

day of November 1919.

James P. Gorter

TRUE COPY—TEST:

Chas. R. Whiteford
CLERK