WASHINGTON BENSON

IN THE CIRCUIT COURT

VS.

:

:

OF

PORTIA BENSON

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

- (I) That he was married to his wife, Portia Benson on the 17th day of September, 1922 and with whom he resided until the 30th day of April, 1924 when the defendant deserted the plaintiff.
- (2) That ever since said marriage, your Orator has behaved himself as a faithful, chaste and affectionate husband toward the said Portia Benson.
- (3) That the said Portia Benson, has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned men, whose names to your Orator are unknown, and said offense has not been condoned by your Orator.
- (4) That there is one child, Jennings Benson, age one year, born as issue of said marriage.
- (5) That both your Orator and the defendant are citizens of the State of Maryland, having resided in Baltimore; City for more than three years prior to the filing of this bill.

TO THE END, THEREFORE:

- (a) That your Orator may be divorced a Vinculo Matrimonii from the said Portia Benson.
- (b) That he may have such other and further relief as his case may require.

May it please your Honor to grant unto your Orator the Writ of Subpoena directed against the said Portia Benson, commanding and requiring her to be and appear in this Court on some day certain to be named therein to answer the premises and abide by and perform such decree or order as may be passed therein.

AND as in duty bound, etc.

Steward Davis

Serge W. Evans

SOLICITOR'S FOR COMPLAINANT.

192

Docket No.

Washington Benson

vs.

Portia Benson

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed ,

192

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

Un Portia Benson

Sen

REISSUED TO

of Baltimore City, Greeting:

Chas R. Whiteford,

R**et**urn Day

Clerk

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you do within the time limited by law beginning on the second Monday of hay next cause an appearance to be entered for you and your answer to be filed to the complaint of

Washington Benson

against you exhibited in the Circuit Court 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 low day of March 1924.

Issued the 81, day of May, in the year 1924.

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11.)

Ct. Ct. 192 4 Docket No. Washington Benson vs. Portia Benson 160 & Fayello of SUBPOENA TO ANSWER BILL OF COMPLAINT Filed SOLICITOR

EQUITY SUBPOENA

The State of Maryland

To Portia Benson

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 May next cause an appearance to be entered for you and your answer to be filed to the complaint of

Washington Benson

against you exhibited in the Circuit Court 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 10" day of March 1924,

Issued the 8' day of May, in the year 1924,

Chas R. Whiteford, Clerk

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11.)