

IN THE CIRCUIT COURT NO. 2

OF

13649
1925

BALTIMORE CITY.

SAMUEL BROWN

VS.

SADIE BROWN

To Mr Paul Patterson
219 Northway, Guilford

BILL FOR DIVORCE.

Mr. Clerk:-

Please file.

No 2599 B

Davis Evans

ATTORNEYS FOR PLAINTIFF

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

By 6th Street

3/19/25

SAMUEL BROWN

:

IN THE CIRCUIT COURT NO.2

VS.

:

OF

SADIE BROWN

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

1. That he was married to his wife, Sadie Brown, on or about the 15th day of August, 1912, in Baltimore City, and with whom he resided until about the 10th day of March, 1922, when the defendant deserted the plaintiff.
2. That though the conduct of your Orator toward the said Sadie Brown, has always been kind, affectionate and above reproach, she has, without any just cause or reason abandoned and deserted him and has declared her intentions to live with him no longer and that such abandonment has continued uninterruptedly for more than three years and is deliberate and final and the separation of the parties is beyond any reasonable expectation of reconciliation.
3. That your Orator has not lived or co-habited with the said defendant since said desertion.
4. That there are no children born as result of said marriage.
5. That the defendant is a citizen of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this bill of complaint.

TO THE END, THEREFORE:

(a) That your Orator may be divorced a vinculo matrimonii from the said Sadie Brown.

(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 Sadie Brown, 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.

Davis T. Evans
ATTORNEYS FOR PLAINTIFF.



P 68

Ct. Ct. No. 2

649
1925

B

Docket No. 34

Brown

vs. ^{adversely} ~~adversely~~ ^{adversely} ~~adversely~~

1817 Cavanagh St
Trust of Fulton Ave
Brown

Subpoena to Answer Bill of Complaint

No. 25991 B
2-3

Copies - copied
14th December 1925

Filed John H. Evans, 1925

Dennis ^{and} Evans

Solicitor.

14 14

Howell
Dorsey

John P. Potee
Sheriff

17th November 1925

REISSUED TO Secretary Return Day, 1925

John P. Potee
CLERK

How Est
Hogloony

John E. Potee
Sheriff

EQUITY SUBPOENA

The State of Maryland

To

Ladie Brown
vs Paul Patterson Esq
219 Westway Street

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

Samuel Brown

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. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the *14th* day of *September*, 192 *5*
Issued the *6th* day of *November* in the year 192 *5*

John Deasants
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.)

Ct. Ct. No. 2

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192 5 B Docket No. 34

Brown

vs.

Brown

Subpoena to Answer Bill of Complaint

Chy

No. _____

Filed _____, 192

Solicitor.

EQUITY SUBPOENA

The State of Maryland

To



Sadie Brown

17 - November 1925

December

Return Day, 1925

TRUE COPY TEST

John Pleasant
CLERK

John Pleasant
CLERK

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TRUE COPY TEST

John Pleasant
CLERK