

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

64 *D* 174
1444

MARY ESTELLE BURNS

VS.

WILLIAM PANIC BURNS

1405 Lawrence ST

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

J. Steward Davis

George W. Evans
ATTORNEYS FOR PLAINTIFF
B 26699

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

Amended 1924

MARY ESTELLE BURNS : IN THE CIRCUIT COURT
VS. : OF
WILLIAM PANIC BURNS : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, William Panic Burns, on the 8th day of May, 1912 and with whom she resided until the 10th day of March, 1924 when the defendant deserted the plaintiff.
2. That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said William Panic Burns.
3. That the said William Panic Burns has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned women in Baltimore City, whose names to your Oratrix are unknown, and said offense has not been condoned by your Oratrix.
4. That your Oratrix has not lived or co-habited with the said defendant since she discovered his adulteries.
5. That there are two children born as issue of said marriage; Margaret Estelle, age seven, and Eleanor Lucretia, age ten, for whom the plaintiff asks the custody.
6. That both your Oratrix 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.

7. Your Oratrix further states that she is destitute and without funds to defray the expenses of this litigation; further that she is without the means of support for herself and children. That she is advised by Counsel that she is permitted to petition this Honorable Court that the defendant shall be compelled to contribute a reasonable amount as alimony pendente lite toward the support of herself and children and that she will be awarded an amount in order to compensate her Solicitors.

8. Your defendant is employed and earns an average of seventy-five dollars per week.

TO THE END, THEREFORE:

- (a) That your Oratrix may be divorced, A Vinculo Matrimonii from the said William Panic Burns.
- (b) That she may have the custody of her children, Margaret Estelle and Eleanor Lucretia.
- (c) That she may resume her maiden name, MUSE.
- (d) That this Honorable Court may decree that the defendant pay a reasonable sum as alimony pendente lite and an additional sum as counsel fee.
- (e) Permanent alimony.
- (f) That she may have such other and further relief as her case may require.

May it please your Honor to grant unto your Oratrix the Writ of Subpoena directed against the said William Panic Burns, commanding and requiring him 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.

J. Steward Davis
George C. Evans.
SOLICITORS FOR COMPLAINANT.

P 113

174
192 4264 Docket No. Ct. Ct.

Burns

Burns
1405 Laurens st

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B 26699

Filed 15 (March) 1924
J. S. Davis SOLICITOR
G. H. Evans
14



Summoned and a copy of the process left with the defendant
John E. Peter Sheriff

Fees - 0.80

3/14/24
(1924)

EQUITY SUBPOENA

The State of Maryland

On

William P. Burns

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 ~~January~~ *April* next cause an appearance to be entered for you and your answer to be filed to the complaint of

Mary E Burns

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 ~~10th~~ *10th* day of ~~January~~ *March* 192 ~~4~~
Issued the *1/2* day of *March*, in the year 192 ~~4~~,

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.)

64 B Docket 194
1924

CIRCUIT COURT.

Burns

vs.

Burns
1405 Laurens St

Order for Alimony

Pendente Lite

ORDER

B 26699
B No.

(3)

\$75 a week
2 children

Fd.: 13 March 1924
14

Copy of the within Order of Court served on
William F. Burns on the 17th day of March 1924
in presence of Joseph Kyzlowsky
John C. Dudge
Shuff

(Fees \$0.50)

May E. Burns
vs.
William P. Burns

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

March TERM, 1924

ORDERED BY THE COURT this 13 day of March 1924

that the defendant William P. Burns
pay to the plaintiff May E. Burns
the sum of Thirty-⁷⁰

Dollars per week, during the continuance of this suit, accounting from the
day of March 1924 to the said plaintiff May E. Burns

as alimony, *pendente lite* unless cause to the contrary be shown on or before the
day of March 1924, provided a copy of this Order be served on the said defendant
William P. Burns on or before the

day of March 1924
Charles F. Steen

TRUE COPY—TEST

CLERK

648 174
IN THE CIRCUIT COURT OF
1924

BALTIMORE CITY.

MARY ESTELLE BURNS

VS.

WILLIAM PANIC BURNS

Mr. Clerk:-

Please file.

Steward Davis

George Evans
ATTORNEYS FOR PLAINTIFF.

B 26699

{5}
fd 20 March 1924

MARY ESTELLE BURNS

:

IN THE CIRCUIT COURT

VS.

:

OF

WILLIAM PANIC BURNS

:

BALTIMORE CITY

Mr. Clerk:-

Please enter the above case dismissed on payment of costs by defendant.

Steward Davis
George E. Evans
ATTORNEYS FOR PLAINTIFF.

3/13/1924

In The Circuit Court
of
Baltimore City.

68 B 174
1924

MARY ESTELLE BURNS

VS.

WILLIAM PANIC BURNS.

826699
~~ANSWER~~
(4)

Mr. Clerk:--

Please file &c.,

Roy S. Bond
Sol. for Respondent.

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

FILED

18 March 1924

MARY ESTELLE BURNS
VS.
WILLIAM PANIC BURNS

In The Circuit Court
- of -
Baltimore City.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Respondent, William Panic Burns, in answer to Bill of Complaint heretofore filed respectfully says:

(1) He admits the marriage and date of separation as alleged but denies that he deserted the plaintiff.

(2) He denies the allegations contained in paragraph TWO.

(3) He indignantly denies paragraph THREE, and to the contrary says that he has always been a good, kind, affectionate husband to his wife, Mary Estelle Burns.

(4) In answer to paragraph FOUR, he respectfully refers to his answer of paragraph THREE.

(5) He admits the allegations contained in paragraph, ^{five} but denies that the plaintiff should have the custody of the children.


(6) He admits the allegations contained in paragraph SIX.

(7) He denies the allegations contained in paragraph SEVEN.

(8) He denies the allegations contained in paragraph EIGHT.

WHEREFORE your Respondent prays that the bill for divorce, A Vinculo Matrimonii, be dismissed and the order thereon vacated.

As in duty bound, etc.,


Solicitor for Respondent.