

IN THE CIRCUIT COURT

OF

*62 B 717*  
BALTIMORE CITY

LEROY COOPER

*1922*

VS.

MAUDE COOPER

*1608 Aliceanna St.*

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

*B 24662*

Solicitor for Complainant

*(1)*

DAVIS & BISHOP

ATTORNEYS AT LAW

BANNEKER BUILDING

14 E. PERSANS STREE

BALTIMORE, MD.

*D. W. Hale 1922*

*3/13/13*

LERoy COOPER : IN THE CIRCUIT COURT

VS. : OF

MAUDE COOPER : BALTIMORE CITY.

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

(1)

That he was married to his wife, Maude Cooper July 20, 1916 and with whom he resided until about the 15th day of December, 1918.

(2)

That though the conduct of your Orator toward the said Maude Cooper has always been kind, affectionate and above reproach, she has, without just cause or reason abandoned and deserted him and has declared her intention to live with him no longer; and has committed the crime of adultery with divers lewd and abandoned men in Baltimore City, whose names to your Orator are unknown and said offense has not been condoned by your Orator. The said abandonment has continued uninterruptedly for more than three years and is deliberate and final and the separation of the parties is beyond any reasonable reasonable expectation of reconciliation.

(3)

That your Orator has not lived or co-habited with said defendant since said desertion and since he discovered her adulteries.

(4)

That there is one child, age four years, 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.

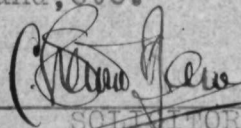
TO THE END, THEREFORE:

(a). That your Orator may be divorced a Vinculo Matrimonii from the said Maude Cooper.

(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 Maude Cooper 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.



SOLICITOR FOR COMPLAINANT.

EQUITY SUBPOENA

DEPARTMENT OF JUSTICE



717  
192 2 362 Docket No. Ct. Ct.

LEROY COOPER

VS

MAUDE COOPER

1608 Aliceanna St

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. *B Pro*  
*24662*

Davis & Bishop  
Attyns,.

Filed *B Jan* 192 *3*  
*J S Davis*  
SOLICITOR

*94*  
Summoned and a Copy of the Process left with the defendant.

*Thomas J. McTully*  
*Shediff*

*(Gaff)* 1/13/22 Fees \$ 0.80

EQUITY SUBPOENA

The State of Maryland

To MAUDE COOPER

ST 12/13/22 (2)



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

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 13th day of November 1922 Issued the 11 day of December, in the year 1922

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.)