

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

*B 153
1927*

HUBERT DAVIS

VS.

VIRGINIA DAVIS

BILL FOR DIVORCE.

B 31659

Mr. Clerk:-

17 12

Please file.

Davis Evans
Attorneys for Plaintiff

DAVIS & EVANS
ATTORNEYS AT LAW

*fd 26 March 1927
" 28" March 1927*

313/3135

HUBERT DAVIS

:

IN THE CIRCUIT COURT

VS.

:

OF

VIRGINIA DAVIS

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

1. That he was married to his wife, Virginia Davis, on the 14th day of January, 1908 in Pittsylvania County, Virginia and with whom he resided until the 14th day of February, 1919, when the defendant deserted the plaintiff.
2. That though the conduct of your Orator toward the said defendant 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 four children born as issue of said marriage; Selma, age twenty years; Leonard, age eighteen; George Preston, age fifteen ; and Arthur Lee, age thirteen years.
5. That your Orator 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, but that the defendant is a non-resident of the State of Maryland and when last heard of was in Philadelphia, Pennsylvania.

TO THE END, THEREFORE, YOUR ORATOR PRAYS:

(a) That he may be divorced A Vinculo Matrimonii from the said Virginia Davis.

(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 Order of Publication directed against the said Virginia Davis, a non-resident of the State of Maryland, 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.


ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS, SOLICITORS,
215 ST. PAUL PLACE,
IN THE CIRCUIT COURT OF BALTIMORE CITY
HUBERT DAVIS VS. VIRGINIA DAVIS

ORDER OF PUBLICATION

The object of this Bill is to procure a Divorce A Vinculo Matrimonii by the plaintiff, Hubert Davis, from the defendant, Virginia Davis.

The bill states that the parties were married on the 14th day of January, 1908 in Pittsylvania County, Virginia and lived together until the 14th day of February, 1919 when the defendant deserted the plaintiff. That though the conduct of the plaintiff toward the said defendant has always been kind, affectionate and above reproach, she has, without 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 hope of reconciliation. That your Orator has not lived or co-habited with the said defendant since said desertion. That there are four children born as result of said marriage; Selma, Leonard, George, and Arthur. That your Orator is a citizen of the State of Maryland but that the defendant is a non-resident of the State of Maryland and when last heard of was in Philadelphia, Pennsylvania.

It is thereupon ordered by the Circuit Court of Baltimore City this 28th day of March 1927, that the plaintiff by causing a copy of this order to be inserted in some daily newspaper published in Baltimore City, once a week for four successive weeks, before 28th day of April 1927, give notice to the absent defendant of the object and substance of this Bill, warning her to be and appear in this Court in person or by Solicitor on or before the 16th day of May 1927, to show cause, if any she may have, why a decree should not be passed as prayed.

James P. Forten