

B 399/1924

7/19/50

In The  
Circuit Court, No. 2  
Baltimore City.

GEORGE DAWSON

VS.

AGNES DAWSON.

1215 Division St

Bill for divorce-

A VINCULO MATRIMONII.

No 24342 B

Mr. Clerk:--

Please file &c.,

*Roy S. Bond*  
Sol. for Plaintiff.

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

FILED 22 August 1924

THE DAILY RECORD COMPANY  
Baltimore, Md.

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- GEORGE DAWSON

IN THE

VS.

CIRCUIT COURT NO. 2

AGNES DAWSON

BALTIMORE CITY.

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator, George Dawson complaining, respectfully says:

FIRST: That he was married to his wife, Agnes Dawson, in Baltimore City, State of Maryland, on or about the 7th day of May, 1920, with whom he resided until on or about the 3rd day of November, 1920.

SECOND: That both parties are residents of Baltimore City, State of Maryland, and have been for more than two years prior to the filing of this Bill of Complaint.

THIRD: That his wife, Agnes Dawson, before marriage, has been guilty of illicit carnal intercourse with another man, the same being unknown to the husband at the time of marriage and that he has never forgiven or condoned the said offense.

FOURTH: That the defendant has on divers days and times since the said marriage, committed the crime of adultery with divers lewd men, whose names will be disclosed on the day of trial, and that the said acts were committed without her procurement connivance or consent, and that he has not lived nor cohabited with the said defendant, since he discovered the same.

FIFTH: That though the conduct of your orator has been kind, affectionate and above reproach, she without any just cause or reason, has abandoned and deserted him and has declared her intentions to live with him no more; that such abandonment has continued uninterruptedly for more than three years, is de-

liberate and final and beyond reconciliation.

SIXTH: That one child was born November 29th, 1920,  
whose paternity the plaintiff denies.

WHEREFORE YOUR ORATOR PRAYS:

- a- A divorce, A Vinculo Matrimonii,  
from the defendant, Agnes Dawson,
- b- Such other and further relief as  
the case may require.

May it please your Honor, to grant unto your  
Orator, George Dawson, the writ of subpoena, directed unto  
the said defendant, Agnes Dawson, residing 1215 - Division St.  
commanding her to be and appear in this court, in person or by  
solicitor, on some day certain to be therein named, and perform  
such decree as may be passed in the premises.

As in duty bound, etc.,

  
Sol. for Plaintiff.

P224

Ct. Ct. No 2

399  
192 4

B

Docket No. 33

Dawson

vs.

1215 Dawson

Dawson

Subpoena to Answer Bill of Complaint

Pro ✓

No. 24342 B.

Copy - Copied

Filed

25 August 1924  
Woy S. Boyd

Solicitor.

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Summoned and a copy of the Process left with

the defendant

(Bichy  
8/22/24)

John B. Potee  
Sheriff

Fee \$0.80

EQUITY SUBPOENA  
The State of Maryland

To

*Agnes Dawson*  
*1215 Division St*

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

*George Dawson*

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 *14* day of *July*, 192*4*

Issued the *22* day of *August*, in the year 192*4*

*John Pleasants*

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.)



IN THE CIRCUIT COURT NO. 2

OF 33 B. 399

BALTIMORE CITY. 1924

GEORGE DAWSON

VS.

AGNES DAWSON

RESPONDENT'S ANSWER.

Mr. Clerk:-

Please file.

*Gilbert & MacBeth*

*Davis & Evans*

ATTORNEYS FOR RESPONDENT

*No 24342 B.*  
*3*

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

*5 September 1924*

GEORGE DAWSON

:

IN THE CIRCUIT COURT NO. 2

VS.

:

OF

AGNES DAWSON

:

BALTIMORE CITY.

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the above entitled case respectfully says:

1. That she admits the allegations contained in the first paragraph of the complainant's bill.
2. That she admits the allegations contained in the second paragraph of the complainant's bill.
3. That she denies the allegations contained in the third paragraph of the complainant's bill.
4. That she denies the matters contained in the fourth paragraph of the complainant's bill.
5. That she denies the matters contained in the fifth paragraph of the complainant's bill.
6. That she neither admits nor denies the matters contained in the sixth paragraph of the complainant's bill.
7. Your respondent is destitute and without means to defend this <sup>suit</sup> /, whereas the complainant is employed and earns about fifty dollars per week. The respondent is advised by counsel that she is entitled to petition this Honorable Court to pass an order requiring the complainant to pay a sum to the respondent as alimony pendente lite and an additional sum as counsel fee.

WHEREFORE YOUR RESPONDENT PRAYS:

- (a) That the Bill of Complaint be dismissed with cost to the plaintiff.
- (b) That this Honorable Court will decree that the petitioner pay a reasonable sum as alimony pendente lite and an



additional sum as counsel fee.

*Robert E. Macbeth*

~~RESPONDENT~~

*Savis and Evans*  
ATTORNEYS FOR RESPONDENT.

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this        day of August, in the year one thousand nine hundred and twenty four, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared Agnes Dawson, respondent in the foregoing bill and made oath in due form of law that the matters contained in this, her answer, are true to the best of her knowledge and belief.

AS WITNESS my hand and Notarial Seal.

\_\_\_\_\_  
NOTARY PUBLIC.



Circuit Court No. 2

399 —

192 7 —

Docket 33/B

GEORGE DAWSON

vs.

AGNES DAWSON

*Says*

Petition for leave to take  
Testimony and Order of  
Court thereon

No. 24342 B  
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Filed 29 September, 1924

GEORGE DAWSON

vs.

AGNES DAWSON

IN THE

Circuit Court No. 2,

OF

BALTIMORE CITY.

To the Honorable the Judge of the  
Circuit Court No. 2 of Baltimore City:

THE PETITION OF George Dawson, Plaintiff

in this case, respectfully shows that he desire s to take testimony in this case, and  
respectfully pray s that leave be granted him to do so before one of the Standing  
Examiners of this Court.

*Roy Bond*  
Solicitor for Plaintiff-

ORDERED, this 29 day of Sept 1924, that leave be  
granted to the parties to the cause, to take testimony, as prayed, before any one of the Standing Examiners of this  
Court.

*Walter S. Dentkins*