

3/13/30

IN THE CIRCUIT COURT OF

BALTIMORE CITY

B. B. [Signature]

MARY AGNES DIGGS

VS.

ELIAS DIGGS

BILL FOR DIVORCE.

Mr. Clerk:-

Please file.

Davis Evans
ATTORNEYS FOR PLAINTIFF

B 31531

21727

DAVIS & EVANS
ATTORNEYS AT LAW

99 13 Feb 1927
12 Feb 1927
PAUMGARTEN & CO., INC., Feb. 1927.

MARY AGNES DIGGS

:

IN THE CIRCUIT COURT

VS.

:

OF

ELIAS DIGGS

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, Elias Diggs, on the 18th day of October, 1888 in Washington, D.C. and with whom she resided until the 14th day of April, 1903 when the defendant deserted the plaintiff.
2. That though the conduct of your Oratrix toward the said Elias Diggs has always been kind, affectionate and above reproach, he has, without any just cause or reason, abandoned and deserted her and has declared his intentions to live with her 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 Oratrix has not lived or co-habited with the said defendant since said desertion.
4. That there are no minor children as result of said marriage.
5. That your Oratrix 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:

- (a) That your Oratrix may be divorced A Vinculo Matrimonii from the said Elias Diggs.
- (b) That she may resume her maiden name " FORD".
- (c) 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 Order of Publication directed against the said Elias Diggs, a nonresident of the State of Maryland, 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.

Davis Evans

ATTORNEYS FOR PLAINTIFF.

17

C. 1

DAVIS & EVANS, SOLICITORS
215 St. Paul Place,
IN THE CIRCUIT COURT OF BALTIMORE CITY
MARY AGNES DIGGS, VS. ELIAS DIGGS

ORDER OF PUBLICATION

The object of this bill is to procure a divorce A Vinculo Matrimonii by the plaintiff, Mary Agnes Diggs, from the defendant, Elias Diggs.

The bill recites that the parties were married on the 18th day of October, 1888 in Washington, D.C. and lived together until the 14th day of April, 1903 when the defendant deserted the plaintiff. That though the conduct of your Oratrix has always been kind, affectionate and above reproach, he has, without any just cause or reason abandoned and deserted her and has declared his intentions to live with her no longer and that such abandonment has continued uninterruptedly for more than ^{and is deliberate & final} three years, and the separation of the parties is beyond any reasonable hope of reconciliation. That your Oratrix has not lived or co-habited with the said defendant since said desertion. That there are no minor children as result of said marriage. That your Oratrix 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 18th day of February 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 the 21st day of March 1927, give notice to the absent defendant of the object and substance of this bill, warning him to be and appear in this Court in person or by Solicitor, ~~on or before~~ before the 5th day of April 1927 to show cause, if any he may have, why a decree should not be passed as prayed.

James P. Fowler

192.....

Docket No.....

88
1927

Wiggs

vs.

Diggs

Certificate of Publication

B 3/5-31
(3)

THE DAILY RECORD

Filed 12 day of March 1927

THE DAILY RECORD

Davis & Evans, Solicitors,
215 St. Paul Place.

IN THE CIRCUIT COURT OF BALTIMORE CITY—(B—88—1927)—Mary Agnes Diggs vs. Elias Diggs.

ORDER OF PUBLICATION.

The object of this bill is to procure a divorce a vinculo matrimonii by the plaintiff, Mary Agnes Diggs, from the defendant, Elias Diggs.

The bill recites that the parties were married on the 18th day of October, 1888, in Washington, D. C., and lived together until the 14th day of April, 1903, when the defendant deserted the plaintiff. That though the conduct of your oratrix has always been kind, affectionate and above reproach, he has, without any just cause or reason abandoned and deserted her and has declared his intentions to live with her no longer, and that such abandonment has continued uninterruptedly for more than three years, is deliberate and final and the separation of the parties is beyond any reasonable hope of reconciliation. That your oratrix has not lived or cohabited with the said defendant since said desertion. That there are no minor children as result of said marriage. That your oratrix is a citizens 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 18th day of February, 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 the 21st day of March, 1927, give notice to the absent defendant of the object and substance of this bill, warning him to be and appear in this Court in person or by solicitor, on or before the

5th day of April, 1927, to show cause, if any he may have, why a decree should not be passed as prayed.

JAMES P. GORTER,

True Copy—Test:

CHAS. R. WHITEFORD,

f19,26ma5,12

Clerk.

Baltimore, *Mar 12th*, 1927

We hereby certify that the annexed advertisement of Order *Publication* Circuit Court

of Baltimore City, Case of

Mary Agnes Diggs
vs. *Elias Diggs*

was published in THE DAILY RECORD, a daily newspaper published in the City of Baltimore, once in each of

Four successive weeks before the *21st* day of *March*, 1927

First insertion *Feb. 19th*, 1927

THE DAILY RECORD

Per

C. Watkins