3/12/13/5 Su Cerant Ct of Baett John 37 Mary Dilver -19m Wom Julues Bill for Dervice & V miculo Why Clerk please file (Inter) Danis 2072 J. STEWARD DAVIS ATTORNEY AT LAW 118 E. LEXINGTON STREET BALT MORE, MD.

Mary Dilver	In	The	Circuit	Court
vs.			of	
William Dilver	Balt:	imore	e City.	

To The Honorable, The Judge of Said Court:

Your Oratrix, complaining, respectfully states:

FIRST, That the parties hereto, were married March 4th. 1907 in Baltimore, Md. by Rev. Jones a Baptist minister; and they lived together as man and wife until the 15th. day of September, 1915.

SECOND, That Your Oratrix is a resident of the city of Baltimore, state of Maryland, and has been for more than two years prior to the filing of this bill of complaint. That the respondent is also a resident of the city of Baltimore, state of Maryland.

THIRD, That though the conduct of your Oratrix toward her husband has always been kind, affectionate and above reproach; he without any just cause or reason was extremely cruel and barbarous to your Oratrix. On one occasion knocking her tooth out; that he not only refuse to support your Oratrix but forcibly took her money for his own support; that upon divers times and occasions he had committed adultery with several lewd and abandoned women whose names are unknown to your Oratrix; thus forcing your Oratrix to leave him; that said desertion of respondent has continued uninterruptedly for more than three years prior to this filing of this Bill of complaint and was delivered and final and beyond any reasonable hope or expectation of reconciliation.

FOURTH, That Your Oratrix has never condoned nor forgiven the said desertion, that she has never co-habited with the said respondent since the said desertion

FIFTH, That there is one minor child, Walter, I2 years old. born of the parties to this suit.

SIXTH, That Your Oratrix is without the means to defray the expenses of this litigation and that the defendant is employed, earning about \$30 per week, and she is advised by counsel that she is entitled to have an order passed by This Honorable Court, awarding her a certain sum as alimony during the progress of this suit, permanent alimony for the support of the aforesaid minor child, and a further sum to compensate her solicitor for his services in the cause.

-2-

WHEREFORE YOUR ORATRIX PRAYS:

a-That a decree be passed, divorcing Your Oratrix from the respondent, a vinculo matrimonnii.

b-Permanent for the support of herself and minor child.

c-Such other and further releif as the case may require, including alimony pendente lite and counsel fee in such sums as this Honorable Court may think proper.

May it please Your Honor to grant unto Your Oratrix a writ of subpoena, directed unto said defendant, commanding him to be or appear in this Court on some day certain, to be named therein, to perform such decree as may be passed in the premises.

As in duty boundetc.

Complainant (S

Solicitor for Complainant.

State of Maryland)) To Wit City of Baltimore)

I hereby certify that on this 3. day of Mar, 1920, before me the subscriber, a Notary Public in and for the city of Baltimore, state of Maryland aforesaid, personally appeared Mary Dilver complainant in the foregoing bill and made oath in due form of law that the matter contained therein was true to the best of her knowledge and beleif.

(Cogers Notary Public.

10 B60 Ct. Ct. /3 Docket No. 191/ £ ilve SUBPOENA TO ANSWER BILL OF COMPLAINT Pri No. 123 2 Narch 19120 Filed Davis 2

EQUITY SUBPOENA The State of Maryland Tu

Uilliam Dilver

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said City, on the second Monday of March. 1977 to answer the complaint of

Mary Lilve

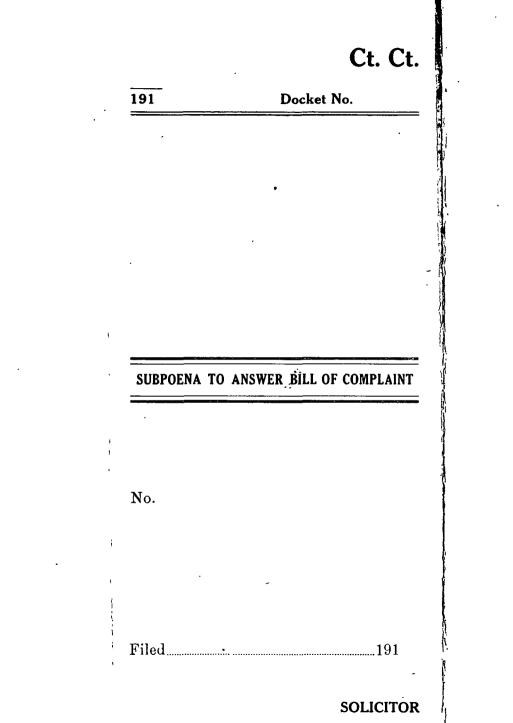
agaińst you in said Court exhibited.

HEREOF fail not, as you will answer the contrary at your peril:

WITNESS, the honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the MUNY 1920 in the year 199 day of (Issued the

Clerk. hiterad Notice to the person summoned : Chuo

"Personal attendance in Court on the day named in the above writ is not required; but unless within such number of days thereafter as the law limits, legal defence is made in the above mentioned suit a Judgment by default may be entered against you."



EQUITY SUBPOENA The State of Maryland

Tn

Man Dilver,



of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said City, on the second Monday of -> NCh. 1910, to answer the complaint of

Mary +

against you in said Court exhibited. HEREOF fail not, as you will answer the contrary at your peril:

Clerk.

WITNESS, the honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of UNU 19130 Baltimore City, the day of

Issued the

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Notice to the person summoned:

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XK COB Docket 137 At P. 47 20 1920 CIRCUIT COURT ve. MAN mich **Order For Alimony** Pendente Lite ORDER S.E. B No. OVer (3) Fd: 6 March 1920 SP 3473 14

IN THE Mary L CIRCUIT COURT Millian OF BALTIMORE CITY TERM, 192 🔿 .day of. 192 0 ORDERED BY THE COURT this..... hand that the defendant. Mary pay to the plaintiff..... the sum of..... Dollars per week, during the continuance of this suit, accounting from the March 1920 to the said plaintiff (Mary & day of as alimony, pendente lite unless cause to the contrary be shown on or before the. Ach 192 Oprovided a copy of this Order be served on the said defendant day of. 154 the on or before the 192 0 day of.... nircl

TRUE COPY-TEST:

CLERK

B Docket CIRCUIT COURT ٠ vs. Order For Alimony Pendente Lite _ ORDER **B** No. Ę. *Fd.:*

IN THE M CIRCUIT COURT OF BALTIMORE CITY .TERM, 192 *O* dav of ORDERED BY THE COURT this ver that the defendan M. pay to the plaintiff (/ the sum of Owel Dollars per week, during the continuance of this suit, accounting from the 1920 to the said plaintiff Mary Dilver day of March. as alimony, pendente lite unless cause to the contrary be shown on or before the day of March. 1920, provided a copy of this Order be served on the said defendant 15th Villiam Dever on or before the day of March. 192 0 et O

TRUE COPY_TEST:

24 Ct. Ct. <u>|}.</u> 19278 Docket No. lver Filmer SUBPOENA TO ANSWER BILL OF COMPLAINT 20 No. 2. 20123 (4) Filed 12 april 19121 Jetwark Davis Solicitor 14

Form 18-61

EQUITY SUBPOENA The State of Maryland

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of Baltimore City, Greeting:

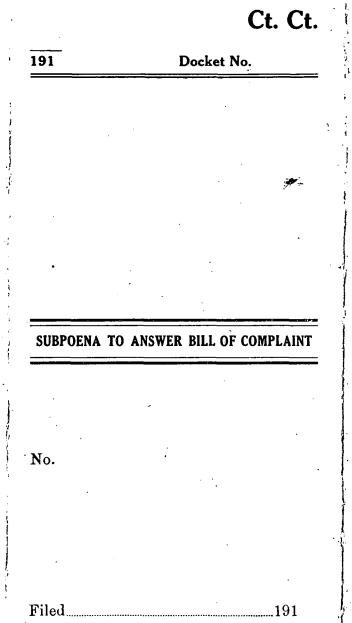
WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said City, on the second Monday of 19100 to answer the complaint of

- against you in said Court exhibited. HEREOF fail not, as you will answer the contrary at your peril:

WITNESS, the honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of day of March' 1900 Baltimore City, the March in the year 1990 Issued the day of (.) 10

Notice to the person summoned:

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SOLICITOR

EQUITY SUBPOENA The State of Maryland In

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WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said City, on the second Monday of (19125), to answer the complaint of

HEREOF fail not, as you will answer the contrary at your peril:

WITNESS,	\mathbf{the}	honora	able MORRIS	A. SOPER, Chie	ef Judge of t	the Supreme Bench of
Baltimore City,	the		ych	day of Ma	sch	the Supreme Bench of 19 PO
Issued the	}	10		1		
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