

B 439
1925

In the Circuit Court No. 2
of Baltimore City.

Daniel E. Dixon,
plaintiff,

vs.

Marian B. Dixon,
defendant.

1207 W. Lanvale St.

Bill of complaint.

No 25593 B

Mr. Clerk:
Please file &c.,

Harry K Brooke,

Sol. for pl'ff.

July 12th August 1925

3/19/25

Daniel E. Dixon,)	In the
plaintiff,)	
)	
vs.)	Circuit Court No. 2
)	
Marion B. Dixon)	
defendant.)	of Baltimore City.

To the Honorable, the Judge of said Court:

Your orator, complaining, says:

1st. That on or about the 24th. day of November, 1921, your orator and Marian B. Dixon, the above named defendant, were married in the City of Baltimore, State of Maryland; and that thereafter said parties hereto resided together as husband and wife in said city during irregular periods of time until about the 12th. day of May, 1925.

2nd. That although the conduct of your orator towards the said Marion B. Dixon, defendant, has ever been that of a kind, true and faithful husband, the said defendant, without any just cause or reason, on or about the 12th. day of May, 1925, afore-said, abandoned and deserted your orator and declared her intention to live with him no longer; that said abandonment and desertion has continued uninterruptedly ever since, is deliberate and final, and the separation of said parties is beyond any reasonable hope or expectation of reconciliation.

3rd. That since the date of said marriage the said defendant has on divers days and dates committed adultery with divers men whose names are not certainly known to your orator.

4th. That since your orator has discovered said adulteries on the part of said defendant he has not lived or cohabited with said defendant, nor in any other way or manner condoned the same.

5th. That no children were born as issue of said marriage.

6th. That your orator and the said Marian B. Dixon, defendant, are both residents of the City of Baltimore, and have been residents of the State of Maryland for more than two years prior to the bringing of this suit.

To the end, therefore,

I. That your orator may be divorced a vinculo matrimonii from the said Marion B. Dixon, defendant.

II. That your orator 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 to the said Marion B. Dixon, defendant, residing in the City of Baltimore, State of Maryland, commanding her to be and appear in this Honorable Court on some certain day to be named therein, in person or by solicitor, to answer the premises and show cause, if any she may have, why a decree ought not be passed as prayed.

And as in duty bound, etc.,

Daniel C. Dixon.

Harry K. Brooks
Solicitor for plaintiff.

EQUITY SUBPOENA
The State of Maryland

To

Marion B. Dixon
1207 N. Lorraine 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

Daniel E Dixon

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 *13th* day of *July*, 192*5*

Issued the *12th* day of *August*, in the year 192*5*

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.)

Dixon to Dixon

Marian B. Dixon, dept

home Friday evening

Aug. 14th, after 7 o'clk

IN THE CIRCUIT COURT NO. 2

OF *13439*
BALTIMORE CITY. *1925*

DANIEL B. DIXON
1805 White St.

VS.

MARION E. DIXON

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

Davis & Evans
SOLICITORS FOR RESPONDENT
No 255193 B
3

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE
BALTIMORE, MD.

Sept 18 Stephens Curran

DANIEL B. DIXON : IN THE CIRCUIT COURT NO.2

VS. : OF

MARION E. DIXON : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the bill of complaint exhibited is as follows:

1. She admits the allegations as contained in the first paragraph of the bill of complaint.
2. She denies with great emphasis the allegations as contained in the second paragraph of the bill of complaint.
3. She denies with great emphasis the allegations as contained in the third paragraph of the bill of complaint.
4. She denies with great emphasis the allegations contained in the fourth paragraph of the bill of complaint.
5. She admits the allegations as contained in the fifth paragraph of the bill of complaint.
6. She admits the allegations contained in the sixth paragraph of the bill of complaint.
7. She states that she is destitute and without means of financing the expenses of this suit and that she is advised by counsel that she is entitled to have an order passed by this Honorable Court awarding some amount as alimony pending this litigation and some sum certain to compensate her Solicitor.

WHEREBY having answered the material allegations of the bill, your respondent prays,

- (a) Alimony pendente lite.
- (b) Counsel fee.

8/20

(c) That the bill be dismissed with costs to the complainant.

Davis & Evans
SOLICITORS FOR RESPONDENT.

June on
Daniel B. Dixon
1805 White St

Harry K. Brooks
Printer

Copy received this
29th Sept. 1925
HK Brooks
Sol. for pff

34 B Docket 439
1925

CIRCUIT COURT No. 2

Dixon

vs.

Dixon

1805 White St

Order Counsel Fee and Alimony

Pendente Lite

Husband Plaintiff

ORDER

No. 98593 B.

(H) (5)

Copy = copied
Copy or not = copied

Filed 18 September 1925

19-H

John E. Patee
Sheriff.

Copy of the within Order of Court served on
Harry K. Brooks, Solicitor for Daniel B. Dixon on
the 29th day of September, 1925, in the
presence of Louis Hecht.

John E. Patee
Sheriff

New \$0.50

non est.

(Keeney)

(2nd Return)

19
E
Saratoga
St

Daniel B Dixon

vs.

Marion E Dixon

IN THE

CIRCUIT COURT No. 2

OF

BALTIMORE CITY

September, TERM, 1925

ORDERED BY THE COURT, this 18 day of September, 1925

that the Plaintiff Daniel B Dixon

pay to the Defendant Marion E Dixon

the sum of twenty Dollars as Counsel Fee for the

Solicitor of the Defendant, and that he further pay the sum of seven

Dollars per week, during the continuance of this suit, to the said Defendant

Marion E Dixon

as Alimony pendente lite, unless cause to the contrary be shown on or before the 3rd

day of October 1925, provided a copy of this Order be served on the said Plaintiff

Daniel B Dixon on or before the 23rd

day of September 1925

\$20. per week
7/10 check

James P. Gorter

TRUE COPY - LIST

The foregoing Order having been returned "Non Est" as appears by No. 2

the Sheriff's return thereon it is Ordered by the Circuit Court of Baltimore City this 28th day of September 1925,

that the time for showing cause under said Order be extended to the 14th day of October 1925,

and the time for service of a copy of the same be extended to the 3rd day of

October 1925.

James P. Gorter

IN THE CIRCUIT COURT NO.2

OF

BALTIMORE CITY.

B 438
1925

DANIEL B. DIXON

VS.

MARION E. DIXON

MARION E. DIXON

VS.

DANIEL B. DIXON

(CROSS BILL)

C R O S S - B I L L

Mr. Clerk:-

Please file.

Davis & Evans

Attorneys for Oratrix in
Cross Bill.

7025593 B
6

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

Filed 2nd October 1925

DANIEL B. DIXON : IN THE CIRCUIT COURT NO.2
Vs.
MARION E. DIXON :
VS. : OF
MARION E. DIXON :
VS.
DANIEL B. DIXON : BALTIMORE CITY.

(Cross Bill)

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The respondent in the original bill, complaining, respectfully says:

1. That having fully answered the bill of complaint filed against her in this Honorable Court, she also desires to file a Cross Bill.
2. That she was married to her husband on or about the 24th day of ~~September~~ 1921 and with whom she resided until about the 12th day of ~~May~~ 1925 when the said Daniel B. Dixon, deserted her. Respondent.
3. That both your Oratrix and respondent are residents of Baltimore, City, State of Maryland and have been for more than two years prior to the filing of these proceedings.
4. That your Oratrix in the Cross Bill has ever since her marriage to her husband, been a faithful, affectionate wife toward her husband.
5. That the said Daniel B. Dixon has on divers days and times committed the crime of adultery with divers, lewd and abandoned women, whose names will be disclosed at the hearing of this Cross Bill; that the said offenses have never been condoned by your Oratrix in the Cross Bill.
6. That there are no children born as result of said marriage.

TO THE END, THEREFORE: Your Oratrix prays:

- (a) A divorce a vinculo matrimonii from the said Daniel B. Dixon.
- (b) Such other and further relief as the case may require.

Davis + Evans
Attorneys for Oratrix in Cross Bill.

P 19

Ct. Ct. No. 2

439
1925

B

Docket No. 34

Dixon

vs.

Dixon

Subpoena to Answer ^{Order} Bill of Complaint

Pro + B of C

No. 25593 B

7
Coyne & Cooper

Filed 13th October, 1925

Lewis & Evans
Solicitor.

B

Non Est
John E. Potee
Sheriff

EQUITY SUBPOENA

The State of Maryland

To

Daniel B. Dixon

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

Marion E. Dixon

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 *14th* day of *September*, 192*5*

Issued the *2nd* day of *October*, in the year 192*5*

John Pleasant
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.)

439
192 J B Ct. Ct. No. 2
Docket No. 34

Dixon

vs.

Dixon

Subpoena to Answer Bill of Complaint

Cady

No. _____

Filed _____, 192

Solicitor.

EQUITY SUBPOENA

The State of Maryland

To



Daniel B Dixon

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

Marion E Dixon

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 *September*, 192 *5*
Issued the *2* day of *October*, in the year 192 *5*

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.)

TRUE COPY TEST

John Pleasants
CLERK

DANIEL B. DIXON : IN THE CIRCUIT COURT NO.2
VS.
MARION E. DIXON :
MARION E. DIXON : OF
VS.
DANIEL B. DIXON : BALTIMORE CITY.

(Cross Bill)

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The respondent in the original bill, complaining, respectfully says:

1. That having fully answered the bill of complaint filed against her in this Honorable Court, she also desires to file a Cross Bill.
2. That she was married to her husband on or about the 24th day of November 1921 and with whom she resided until about the 12 day of May, 1925 when the said Daniel B. Dixon, deserted her.
3. That both your Oratrix and respondent are residents of Baltimore City, State of Maryland and have been for more than two years prior to the filing of these proceedings.
4. That your Oratrix in the Cross Bill has ever since her marriage to her husband, been a faithful, affectionate wife toward her husband.
5. That the said Daniel B. Dixon has on divers days and times committed the crime of adultery with divers, lewd and abandoned women, whose names will be disclosed at the hearing of this Cross Bill; that the said offenses have never been condoned by your Oratrix in the Cross Bill.
6. That there are no children born as result of said marriage.

TO THE END, THEREFORE: Your Oratrix prays:

- (a) A divorce a vinculo matrimonii from the said Daniel B. Dixon,
- (b) Such other and further relief as the case may require.

Davis & Evans

Attorneys for Oratrix in Cross Bill.

B 437
1925

In the Circuit Court No. 2
of Baltimore City.

Daniel E. Dixon,

vs.

Marion B. Dixon.

Marion B. Dixon,

vs.

Daniel E. Dixon.

Order to enter " dismissed "
original bill of complaint.

702559313

Mr. Clerk:

Please file &c.,

Harry K. Brooks,
Sol. for. pl'ff.
in original bill.

Eq 16th October 1925

Daniel E. Dixon,

)

In the

vs.

)

)

Marion B. Dixon.

)

)

Circuit Court No. 2

Marion B. Dixon,

)

vs.

)

)

Daniel E. Dixon.

)

of Baltimore City.

Mr. Clerk:

Please enter the original bill of complaint in
the above entitled cases " dismissed."

Harry K. Brooks,
Solicitor for plaintiff in
original bill of complaint.

IN THE CIRCUIT COURT NO. 2

OF

B 434
1925

BALTIMORE CITY.

DANIEL E. DIXON

VS.

MARION B. DIXON

—
MARION B. DIXON

VS.

DANIEL E. DIXON

(Cross Bill)

Mr. Clerk:-

Please file.

Reis Evans

Attorneys for plaintiff in
Cross Bill.

7/12 593 B
9

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

Filed 16th October 1925

DANIEL E. DIXON

:

IN THE CIRCUIT COURT NO.2

VS.

MARION B. DIXON

:

MARION B. DIXON

OF

VS.

DANIEL E. DIXON

:

BALTIMORE CITY.

(Cross Bill)

Mr. Clerk:-

Please enter the Cross Bill of Complaint in the above
entitled cases dismissed.

Paul & Swan

Solicitors for Plaintiff in Cross Bill
of Complaint.