IN THE --CIRCUIT COURT OF BALTIMORE CITY. MILTON Q. DORSEY LORE TTA DORSEY. -Bill for Divorce--A VINCULO MATRIMONII--Mr: Clerk: Please file &c., ROY S. BOND ATTORNEY AT LAW 14 EastinBleasant St.

THE DAILY RECORD COMPANY Baltimore, Md. VS.

-- CIRCUIT COURT OF --

LORETTA DORSEY

BALTIMORE CITY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

Your Orator- MILTON Q. DORSEY- complaining, respectfully says:

- (I). THAT HE WAS married to his wife, LORETTA DORSEY, at Elliott City, Maryland, on or about the-28th-day of June, 1922, with whom he resided until on or about the 16th-day of June, 1927.
- (2). 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, his Bill of Complaint.
- (3). THAT THE DEFENDANT, LORETTA DORSEY, has on divers days and times since the said marriage, committed the crime of adultery with divers lewd men, whose names will be disclos in the day of trial, and that the said acts were committed out his procurement, connivance or consent, and that he has lived with her nor condoned the offense since he discovered same.
- (4). THAT THE CONDUCT of your Orator during and since the said marriage, has been above reproach in all respects, having always been a kind, affectionate and good husband to the said defendant, his wife.
- (5). THAT THERE are no children as issue of said marriage.

#### WHEREFORE YOUR ORATOR PRAYS:

- -a- A divorce- A VINCULO MATRIMONIIfrom the defendant- LORETTA DORSEY--
- -b- Such other and further relief as the case may require.

MAY IT PLEASE YOUR HONOR, to grant unto your Orator- MILTON Q. DORSEY, the writ of subpoena, directed unto the said defendant, LORETTA DORSEY, residing IO36 N. Eutaw Street, 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.

OCT 6 1027

P. 387 Ct. Ct.

B-502

192 7

Docket No.

Milton Q. Borsey

VS.

Loretta Dorsey

1036m Entone

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B-32320

(2)

led & OCT

192...

Roy S. Bond

SOLICITOR

10

#### **EQUITY SUBPOENA**

## The State of Maryland

To Loretta Dorsey
1036 Eutaw St., 2nd Floor

### 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

#### Milton Q. Dorsey

against you exhibited in the Circuit Court 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 12th day of Sept., 192

Issued the 6th day of 9ct., , in the year 192 7.

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11)

IN THE CIRCUIT COURT OF MILTON Q.DORSEY VS. LORETTA DORSEY RESPONDENT'S ANSWER and PETITION. Mr.Clerk:-Please file. ATTORNEY FOR RESPONDENT DAVIS & EVANS

BAUMGARTEN & CO., INC.

VX.

:

OF

LORETTA DORSEY

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the Bill of Complaint exhibited in this cause respectfully represents:

- I. Your respondent admits the allegations contained in the first paragraph of the Bill of Complaint.
- 2. Your respondent admits the allegations contained in the second paragraph of the Bill of Complaint.
- 3. Your respondent denies with great emphasis the allegations contained in the third paragraph of the Bill of Complaint
- Your respondent answering the fourth paragraph of the Bill of Complaint denies with great emphasis the allegations therein contained and on the contrary avers that the plaintiff has never conducted himself as a kind and affectionate husband. That he has been cruel to your respondent and unduly intimate with other women. And that he has committed the crime of adultery with divers, lewd and abandoned women; and that he is the father of illigitimate children.
- 5. Your respondent admits the allegations contained in the fifth paragraphs of the Bill of Complaint.

Having fully answered the material allegations of your Complainant's Bill in so far as she is advised they should be answered, she prays that this Bill be hence dismissed.

ATTORNEY FOR RESPONDENT

MILTON Q.DORSEY

IN THE CIRCU

VS. : OF

LORETTA DORSEY : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The petition of Loretta Dorsey, the respondent in the above entitled cause, respectfully represents unto your Honor:

- I. That heretofore, to wit, your complainant filed in this Honorable Court his Bill of Complaint for a divorce a Vinculo Matrimonii alleging adultery.
- Your petitioner further alleges that she has filed an answer to the said Bill of Complaint denying the allegations which your Complainant has made and she avers and affirms that when this cause is heard, it will be seen by this Honorable Court that your respondent's answer is clear and concise, whereas your Complainant's bill is destitute and wholly without foundation and that she will be able to prove her contention.
- Your petitioner further alleges that she is advised that she is entitled to have an order passed by this Honorable Court requiring the Complainant in the said cause to pay her a reasonable and proper sum to enable her to defray the necessary expenses of pressing her defense and to compensate her Solicitor. She alleges that she is destitute and without means of support; that your Complainant is not supporting her.
- 4. Your petitioner alleges that your Complainant is employed as a public school teacher and earns or is capable of earning fifty dollars per week.

WHEREFORE your petitioner prays this Honorable Court to pass an order requiring the said Milton Q.Dorsey, the Complainant herein to pay as alimony pendente lite such sum or sums as this Honorable Court shall deem fit and proper and also such other sum or sums as this Court shall deem proper to enable your petitioner to defray the cost of adefending this suit, and the expense to which she will be put therein, including a reasonable fee for her Counsel.

AND as in duty bound, etc.

Lovetta A Dorne

SOLICIEOR FOR PETITIONER

STATE OFMARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this 3 day of October, in the year one thousand nine hundred and twenty seven, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared Loretta Dorsey and made oath in due form of law that the matters and facts in the foregoing petition are true as therein stated.

AS WITNESS my hand and Notarial Seal.

Skelen C. Fisher

IN THE CIRCUIT COURT OF MILTON Q, DORSEY VS. LORETTA DORSEY. (IN CROSS BILL) LORETTA DORSEY VS. MILTON Q. DORSEY BILL FOR DIVORCE Mr. Clerk:-Please file. ATTORNEY FOR PLAINTIFF IN DAVIS & EVANS

BAUMGARTEN & CO., INC.

MILTON Q.DORSEY

IN THE CIRCUIT COURT

VS.

•

OF

LORETTA DORSEY

2

BALTIMORE CITY

(IN GROSS BILL)

LORETTA DORSEY

IN THE EIRCUIT COURT

VS.

•

OF

MILTON Q.DORSEY

• •

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:
Your Oratrix complaining respectfully says:-

- That heretofore, to wit: Milton Q.Dorsey, the husband of your Oratrix, filed his bill of complaint against her in this Court alleging, among other things, that your Oratrix had committed the crime of adultery and thereupon, the said Milton Q.Dorsey prayed that he might be divorced A Vinculo Matrimonii from your Oratrix.
- 2. That your Oratrix has answered said Bill of Complaint and in her answer has shown that Milton Q.Dorsey is not entitled to any relief from this Honorable Court.
- That for some years past the said Milton Q.Dorsey, her husband, has treated her with great cruelty, harshness and brutality, at times striking and beating her and that his conduct has now become so intolerable that she can endure it no longer.
- 4. That the defendant, Milton Q. Dorsey, has committed the crime of adultery with divers, lewd and abandoned women, whose names, at present, to your Oratrix are unknown.
- 5. That your Oratrix has not lived or co-habited with the defendant since she discovered the adulteries complained of nor has she in any way condoned the offenses.

#### WHEREFORE, YOUR ORATRIX PRAYS:

- (a) A divorce A Vinculo Matrimonii.
- (b) Such other and further relief as the case may require.

May it please your Honor to grant unto your Oratrix the Writ of Subpoena directed against the said Milton Q.Dorsey, commanding and requiring him to be and appear in this Honorable 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.

Louetta A Down Leorgen Evans Plaintiff CROSS BILL.

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this day of October, in the year one thousand nine hundred and twenty seven, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City aforesaid, personally appeared Loretta Dorsey and made oath in due form of law that the matters and facts in the foregoing bill are true to the best of her knownedge and belief.

AS WITNESS my hand and Notarial Seal.

NOTARY PUBLIC

P406

Ct. Ct.

502 192 7

Docket No.

MILTON Q. DORSEY

VS.

LORETTA DORSEY

(IN CROSS BILL)

LORETTA DORSEY

VS.

MILTON Q. DORSEY

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B 32320

(6)

Filed 24 Oct , 1927

George W. Evans

SOLICITOR

RECEIVED AT THE SHERIFFS OFFICE ON

OCT 15 1927 10 49 AM

1 ...

### **EQUITY SUBPOENA**

# The State of Maryland

On MILTON Q. DORSEY

1319 Upton Street

### 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 November Cross Bill next cause an appearance to be entered for you and your answer to be filed to the complaint of

#### LORETTA DORSEY

against you exhibited in the Circuit Court 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

13"

day of

September

1927

Issued the

14"

day of October

, in the year 1927

lohas R Whiteford Clerk

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11)

Docket B67
1927
Circuit Court

Milton 7. Dorsey
1319 Uptole A

Sovetha Dorsey

Order Counsel Fee and Alimony

Pendente Lite

BNo. 32320

Fd 15 Oct 1927

RECEIVED AT THE SHERIFFS OFFICE ON

OCT 15 1927 10 49 AM

| Milton J. Dorsey   | CIRCUIT COURT  |
|--|--|
| VS,.   | OF   |
| ,  | BALTIMORE CITY                                       |
|  | ·  |
| Loretta Dorsey   | Sept TERM  |
|  |  |
| ORDERED BY THE COURT this                                      | 15 day of october 1927                               |
| that the Plaintiff Milton 7, 2                                 | Jorsey   |
| that the Plaintiff Milton J. 2 pay to the Defendant Soretta De | •  |
|  | Dollars as Counsel Fee for the                       |
| Solicitor of the Defendant and that he further pay             | the sum of Syteen                                    |
| Dollars per week, during the continuance of this so            | nit, to the said Defendant Norths Dansey             |
|  | 2/"  |
| as Alimony, pendente lite, unless cause to the cont            | rary be snown on or before the                       |
| day of Ottober 1927, provided                                  | a copy of this Order be served on the said Plaintiff |
| Millon Dorsey on or be   | fore the $22$  |
|  |  |
| day of October 1927  |  |
| H. a.  | the Himp   |
|  |  |
| TRUE COPY—TEST:  |  |
| ,  |  |
|  |  |

CLERK

—IN THE—

IN THE CIRCUIT COURT OF BALTIMORE CITY.

B 502

MILTON Q. DORSEY

-- VS. --LORETTA DORSEY.

ANSWER TO CROSS BILL.

32320

MR: CLERK:

PLEASE FILE &c.,

ROY S. BOND

ATTORNEY AT LAW

28 Oct 192)

THE DAILY RECORD COMPANY Baltimore, Md.

MILTON Q. DORSEY

IN THE

VS.

CIRCUIT COURT OF

LORETTA DORSEY --

-- BAL MORE CITY.

Cross- Bill

LORETTA DORSEY--

VS.

MILTON Q. DORSEY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

Your Respondent- MILTON Q. DORSEY- in answer respectfully says:

- (I). THAT HE admits the allegations contained in paragraph ONE.
- (2). THAT HE denies the allegations contained in paragraph TWO.
- (3). THAT HE denies the allegations contained in paragraph THREE.
- (4). THAT HE indignantly denies the allegations contained in paragraph FOUR.
- (5). THAT HE denies the allegations contained in paragraph FIVE.

HAVING ANSWERED in so far as he is advised is necessary, he respectfully prays that the Cross-Bill be dismissed and the order thereon vacated:

AS IN DUTY BOUND, etc.,

ol for Respondent in

Cross- Bill.

IN THE --CIRCUIT COURT OF BALTIMORE CITY. 25 92 MILTON Q. DORSEY VS. LORETTA TO PETITION FOR ALIMONY COUNSEL FEE.

MR: CLERK:

Sol for Main lift.

ROY S. BOND

14 ATTORNSY BLANCAUT St

BALTIMORE MD.

FILED 28 Oct 192

THE DAILY RECORD COMPANY Baltimore, Md. MILTON Q. DORSEY

IN THE

ľ

11

VS.

-- CIRCUIT COURT OF --

" BALTIMORE CITY.

LORETTA DORSEY.

11

TO THE HONORABLE- THE JUDGE OF SAID COURT:

Your Respondent- MILTON Q. DORSEY- in answer to petition for alimony and Counsel fee, respectfully says:

- (I) THAT HE is not capable of making Fifty (\$50) Dollars, per week, or paying his wife any alimony and Counsel fee in this case, --regardless as to how eager he may be to comply with the order of this Honorable Court.
- (2) THAT his expenses are such that he has nothing left for himself.

IN ANSWER he respectfully prays that the petition for alimony and Counsel fee be dismissed and the order thereon vacated.

AS IN DUTY BOUND, etc.,

Sol. for Respondent

Milton J. Dovsly
Respondent.

STATE OF MARYLAND
BALTIMORE CITY- to wit-

I HEREBY CERTIFY that on this - /9 day

of October 1927, before me, the subscriber, a

Notary Public, of the State of Maryland, in and for Baltimore
City, personally appeared-MILTON Q. DORSEY- Respondent, and
made oath in due form of law, that the matter and facts set forth
in this, his answer are true to the best of his knowledge and
belief.

AS WITNESS MY HAND AND NOTARIAL SEAL.

-NOTARY PUBLIC-

Roy DBonel

502 Ct. Ct. 1927 No. Docket

Milton & Dorsey

Soretta Dorsey

and Cross Bill

MOTION FOR HEARING

3 32320 No.

Filed 31 day of Oct 192)

De Il Evans

| Milton of Dorsey  Soretta Dorsey  In cross will  Soretta Dorsey  Wilton Dorsey | IN THE  CIRCUIT COURT  OF  BALTIMORE CITY   |
|--|---|
| Lee Solicitor, applies to have the   | by Dorgew Evans  above entitled cause placed on the Trial Calendar  pendente lite and |
| Coansel fez  |   |
| in conformity with the First Equity Rule.  Solicitor for                       | corgled Evans<br>Defandent<br>indiginable)  |

Serve on R. S. Bond Hans Janes MON I HOSU 3 OU I

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| Ct. Ct.  502  192 7 No. B-67 Docket  | 19 19 19 19 19 19 19 19 19 19 19 19 19 1   |
| Dorsey vs.   | Lonente  |
| Horsey   | est for the second of the seco |
| NOTICE OF HEARING  | notice not be so to the  |
| B- No. 32320 (11)  | ithis after the state of the st |
| No   | the r  |
| 10   | le sait  |

Milton G. Dorsey

IN THE

Cross vs. Bill

CIRCUIT COURT

Loretta Dorsey

OF BALTIMORE CITY

Upon application made by the Solicitor for the

Plaintiff in original bill

the above entitled cause has been placed upon the trial calendar in accordance with the provisions of the First Equity Rule, and the same will stand for hearing on alimony pendente lite and counsel fee

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

# **Circuit Court**

 $\beta \frac{502}{1927}$  B No. Docket

Milton Gorsey

Soretta Dorsey

Final Order, Counsel Fee and Alimony

Pendente Lite.

No. 32320 B

Filed 7 Nov

Milton J. Dorsey Søretta Dorsey IN THE

Circuit Court

OF

BALTIMORE CITY.

Sept

Yerm, 1927

This cause coming on to be heard upon the petition for Alimony pendente lite and Counsel fee, and the answer thereto, and testimony taken, and having been submitted by the solicitors for the respective parties,

| the respective parties,   |
|---|
| Ordered by the Circuit Court of Baltimore City this day             |
| of November 1927, that the? Milton of Dorsey.                       |
| pay to the Defendant, Soretha Dorsey                                |
| the sum of Zwenty-five Dollars, as counsel fee                      |
| for the Solicitor of the Defendant and that he                      |
| further pay the sum of Jive 75 Dollars per week,                    |
| to the said Defendant.  |
| as Alimony pendente lite accounting from the day of woverable 1927. |
| and continuing until the day of 19 . (should this suit be           |
| so long pending) or until the further order of this Court           |
| Jotte Supreme Buch.   |
| 1-1. author Starre  |
|   |

IN THE CIRCUIT COURT BALTIMORE CITY. MILTON Q. DORSEY VS. LORETTA DORSEY. PETITION. ( Amended Bill) MR: CLERK: ROY S. BOND East Fleasant Street THE DAILY RECORD COMPANY Baltimere, Md.

1 - -

MILTON Q. DORSEY

IN THE

VS.

-- CIRCUIT COURT OF--

LORE TTA DORSEY

BALTIMORE CITY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

Your Petitioner- MILTON Q. DORSEY- Plaintiff in the above entitled cause respectfully represents unto your Honor:

FIRST: That heretofore to wit: on or about the 6th day of October, 1927, your petitioner, filed in this Honorable Court, his Bill of Complaint, against LORETTA DORSEY, the abovenamed defendant, praying for a divorce- A VINCULO MATTRIMONII.

SECOND: THAT your petitioner desires to file an amended bill of complaint, on the ground of adultery, on the part of the defendant, and praying a divorce, A Vinculo Matrimonii.

THIRD: WHEREFORE YOUR PETITIONER prays that leave may be granted him to file an amended Bill of Complaint, against the said defendant, LORETTA DORSEY, for the purpose of praying a divorce, A VINCULO MATRIMONII.

AS IN DUTY BOUND etc.

LICITOR FOR PETITION

ORDERED by the Circuit Court, New 2 of Baltimore City, this 13 day of November, 1927, on the aforegoing petition, that leave be, and it is hereby granted MILTON Q. DORSEY, the Plaintiff, to file an amended bill of complaint as prayed.

M. arthur Shring

Milton D. Dorsey.
PETITIONER

## STATE OF MARYLAND BALTIMORE CITY to wit-

I HEREBY CERTIFY that on this

of Pecericher 1927, before me, the subscriber, a Notary Public of the State of Maryland, in and for Baltimore City, personally appeared MILTON Q. DORSEY- Petitioner, and made oath in due form of law, that the matter and facts set forth, in this, his petition are true to the best of his knowledge and belief.

NOTARY PUBLIC.

-- IN THE -- CIRCUIT COURT OF BALTIMORE CITY. MILTON Q. DORSEY VS. LORETTA DORSEY. #1036 n. Enlaw Street AMENDED BILL OF COMPLAINT. Mr: Clerk:

Please file &c.,

T. CAOL L MATHETIL

ROY S. BOND

ATTORNEY AT LAW
220 ST. PAUL PLACE
BALTIMORE, MD.

FILED 23 Nile 192)

THE DAILY RECORD COMPANY Beltimore, Md. MILTON Q. DORSEY

IN THE

VS. CIRCUIT COURT OF --

LORETTA DORSEY

BALTIMORE CITY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

The Amended Bill of MILTON Q. DORSEY, leave of Court, having been first had and obtained to file the same, respectfully shows unto your Honor:

- (I). THAT ON OR ABOUT the 28th day of June, 1922, your Orator and the abovenamed defendant were intermarried at Elliott City, Maryland, and the said parties thereafter resided together as man and wife until on or about the 16th day of June, 1927.
- (2). THAT THE DEFENDANT, LORETTA DORSEY, 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 his procurement, connivance or consent, and that he has not lived with the said defendant nor condoned the offense since he discovered the same.
- (3). 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, his Amended Bill of Complaint.
- (4). THAT THE CONDUCT OF your Orator during and since the said marriage, has been above reproach in all respects, having always been a kind, affectionate and good husband to the said defendant, his wife.
- (5), THAT THERE ARE NO children as issue of said marriage.

#### WHEREFORE YOUR ORATOR PRAYS:

- -a-a A divorce- A VINCULO MATRIMONIIfrom the defendant- LORETTA DORSEY--
- -b-b Such other and further relief as the case may require.

MAY IT PLEASE YOUR HONOR, to grant unto your Orator- MILTON Q. DORSEY, the writ of subpoena, directed unto the said defendant, LORETTA DORSEY, residing- 1036

North Eutaw Street, commanding her to be and appear in this Court, in person or by Solicitor, on some day certain to be named therein, and perform such decree as may be passed in the premises.

AS IN DUTY BOUND, etc.,

Milton Durkey

SOLICITOR FOR PLAINTIFF

Ct. Ct.

B-642

1927

Docket No.

Milton Q. Dorsey

VS.

Loretta Dorsey

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

RECEIVED AT THE SHERIFFS OFFICE ON

DEC 23 1927 12 15 PM

B-32320

(15)

Roy S. Bond

SOLICITOR

#### **EQUITY SUBPOENA**

# The State of Maryland

Un Loretta Dorsey

13/2 W Janual Of

### 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 amended bill of amended bill of cause an appearance to be entered for you and your answer to be filed to the complaint of

#### Milton Q. Dorsey

against you exhibited in the Circuit Court 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

November

192 7

Issued the

23rd

day of

December

, in the year 192 7.

MEMORANDUM:

You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11)

IN THE CIRCUIT COURT OF BALTIMORE CITY. MILTON Q. DORSEY VS. LORETTA DORSEY RESPONDENT'S ANSWER TO AMENDED BILL OF COMPLAINT MR.Clerk: Please file. DAVIS & EVANS ATTORNEYS AT LAW

BAUMGARTEN & CO., INC.

VS.

:

:

OF

LORETTA DORSEY

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the Amended Bill of Complaint in the above entitled cause exhibited respectfully shows:

- I. Your respondent admits the allegations set forth in the first paragraph of the amended bill of complaint.
- And for a demurrer to the second paragraph says; that the plaintiff has not set out in the second paragraph of his bill the time and place of the commission of the alleged adultery and the person or persons with whom they were committed.
- 3. Your respondent denies the allegations contained in the third paragraph of the Amended Bill of Complaint.
- 4. Your respondent admits the allegations contained in the fourth paragraph of the Amended Bill of Complaint.

WHEREFORE your respondent prays that the bill be dismissed.

ATTORNEY FOR RESPONDENT

JAN 28 1928 12 17 PM IS OFFICE ON

IN THE CIRCUIT COURT OF BALTIMORE CITY 502-642 MILTON Q, DORSEY 1319 upton St VS. LORETTA DORSEY and Cross Bill. PETITION & ORDER THEREON. Mr. Clerk: Please file.

DAVIS & EVANS

BAUMGARTEN & CO., INC.

MILTON Q.DORSEY

IN THE CIRCUIT COURT

VS.

OF

LORETTA DORSEY and Cross Bill.

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The petition of Loretta Dorsey, defendant respectfully represents:

:

- (I) That on or about the I6th day of October, I927 the plaintiff, Milton Q. Dorsey, filed a bill against the defendant, praying among other things, a divorce a vinculo matrimonii.
- (2) That the bill was properly answered and a petition for alimony and Counsel fee filed.
- (3) That on the 7th day of November, I927 the case came up for a hearing on alimony and counsel fee, at which time an order was passed requiring the said Milton Q.Dorsey to pay unto your petitioner twenty-five dollars as counsel fee and five dollars and seventy-five cents per week as alimony pendente lite.
- (4) That the said Milton Q.Dorsey, though fully able, has refused and continues to refuse to pay unto your petitioner the twenty-five dollars awarded her as payment of her counsel. That he has since filed an amended bill of complaint and is attempting to proceed with his case without first complying with the order of this Honorable Court.
- (5) That unless your petitioner is paid the counsel fee awarded, she will be without funds to defend the case filed against her.

#### WHEREFORE, YOUR PETITIONER PRAYS:

(a) That an order be passed requiring the plaintiff, Milton Q.Dorsey to show cause why he should not be adjudged in contempt of Court for failure to comply with the Order

of this Honorable Court passed on the7th day of November, 1927.

(b) Such other and further relief as the case may require.

ATTORNEY FOR PETITIONER

1. autur Hun

Ordered by the Circuit Court of Baltimore City this 28% day of January, I928 that the plaintiff in the original Bill appear before this Court in person on the 4% day of February I928 at IO A.M. and then and there show cause, if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying the Order of this Court passed on the 7th day of November, I928 directing the payment of counsel fee and alimony by him to Loretta Dorsey, provided a copy of this Order be served on the said Milton Q.Dorsey on or before the 4% day of February 1928.

IN THE 1927
CIRCUIT COURT OF BALTIMORE CITY.

MILTON Q. DORSEY

VS.

-- LORETTA DORSEY.

Order of Dismissal.

1332320

H. 21" May 1929

MILTON Q. DORSEY

IN THE CLRCUIT COURT

OF

VS.

LORETTA DORSEY.

BALTIMORE CITY.

Mr: Clerk:

Please enter the above entitled case dismissed by mutual consent of the parties.

tty. for laintiff.

Attorney for Defendant.