

In the amount of
\$ 13441
Baltimore City

James Elliot
to

James Elliot

Bill for Invoice Amount

Mr Clerk please file

(Signature)

B 22852

DAVIS & BISHOP
ATTORNEYS AT LAW
BANNEKER BUILDING
14 E. PLEASANT STREET
BALTIMORE, MD

Ad 30 August 1921

James Elliott

In The Circuit Court

vs

of

Lucia Elliott

Baltimore City.

.....

To The Honorable, The Judge of Said Court:

Your orator complaining respectfully says:--

FIRST, that the said parties were married on or about March 15, 1919 by a Baptist minister of the gospel in Baltimore City, State of Maryland and lived together as man and wife until January 12, 1921.

SECOND, that the defendant 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.

THIRD, that though the conduct of your orator toward his wife has always been kind, affectionate and above reproach, she without any just cause or reason abandoned and deserted him to live in adultery with lewd and abandoned men whose names are unknown to your orator; ~~that such abandonment has continued uninterruptedly for more than three years prior to the filing of this bill of complaint; and was deliberate and final and beyond any reasonable hope or expectation of reconciliation.~~

FOURTH, that your orator has never condoned nor forgiven the said ~~desertion~~ and adultery, that he has never cohabited with the said respondent since the said ~~desertion~~ and adultery.

FIFTH, that there is one child born as a result of said marriage, aged two months.

WHEREFORE YOUR ORATOR PRAYS:

a-a A divorce a vinculo matrimonii from the defendant.

b-b Such other and further relief as the case may require

[Handwritten signature]
Adopted complaint

193

441 B61 Ct. Ct.
192 / Docket No.

Elliott

"

Elliott

404 N. Bruce

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. ^B 2852

(2)

Filed 13 Sept 1921
J S Davis
SOLICITOR

13

Summoned and a copy of the Process left
with the defendant.

Thomas F. Mc Mully
Sheriff

(Brooks) Mr. F. W. 1080

EQUITY SUBPOENA

The State of Maryland

To

Lucia Elliott

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

James Elliott

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the **11th** day of **July** 192 **1**

Issued the **30** day of **August**, in the year 192 **1**

Chas 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.)

3/12/14/45

In the Circuit Court ^B 441
of Baltimore City. 1921

James Elliott,
 plaintiff,
1821 Pine St.

441 vs.

Lucia Elliott,
 defendant.

Petition.

18 22852

Mr. Clerk: 3
 Please file &c.,

Harry K. Brooks,
Sol. for p'tnr.,
defendant.

fd 6 Sept 1921

James Elliott,) In the
 plaintiff,)
vs.) Circuit Court
Lucia Elliott,)
 defendant.) of Baltimore City.

To the Honorable, the Judge of said Court:

The petition of Lucia Elliott, defendant, in the above entitled cause, respectfully represents unto your Honor:

1st. That heretofore, to wit: on or about the 30th. day of August, 1921, she was sued in this Honorable Court by James Elliott, her husband, the above named plaintiff, for a divorce a vinculo matrimonii, on the grounds of abandonment and adultery.

2nd. That this defendant has answered said bill of complaint, denying the said allegations of abandonment and adultery, and has, by and in her said answer, shown that the said plaintiff is not entitled to any relief in this Honorable Court in the premises.

3rd. That your petitioner is without the necessary means to employ counsel to defend her in said cause, or to properly maintain and support herself and the two months old child of said parties hereto, during the pendency of this suit.

4th. That the said plaintiff is regularly employed at a clothing establishment, and earns about twelve dollars per week.

Wherefore your petitioner prays your Honor to pass an order requiring the said James Elliott, plaintiff, to pay unto your petitioner a reasonable weekly sum of money by way of alimony pendente lite. And also a further sum or sums of money in order that your petitioner may be enabled to employ counsel to defend her in this cause.

5th. That ^{she} has no money to pay counsel to defend her herein and has not paid any money therefor.

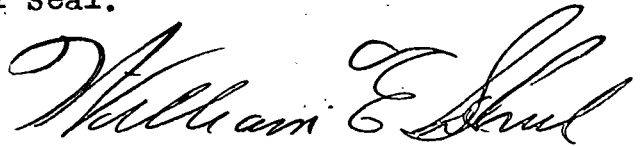
And as in duty bound, etc.

Harry R. Brooks
Solicitor for petitioner.

STATE OF MARYLAND,)
CITY OF BALTIMORE,) to wit:

I hereby certify that on this 6th
day of September, 1921, before me, the subscriber, a Notary
Public of the State of Maryland, in and for the city of Balti-
more, personally appeared Lucia Elliott, and made oath in due
form of law that the matters and facts set forth in the fore-
going petition are true to the best of her knowledge, infor-
mation and belief.

WITNESS my hand and Notarial Seal.



NOTARY PUBLIC.

In the circuit court
of Baltimore city.

J 441
1921

James Elliott,
plaintiff,

vs.

Lucia Elliott,
defendant.

Answer.

B 22852

Mr. Clerk:

(4)
Please file &c.,

Harry K. Brooks,
Sol. for de'ft.

fd 6 Sept 1921

James Elliott,) In the
 plaintiff,)
vs.) Circuit Court
Lucia Elliott,)
 defendant.) of Baltimore City.

To the Honorable, the Judge of said Court:

The answer of Lucia Elliott, defendant, to the bill of complaint of James Elliott, the above named plaintiff, in this Honorable Court against her exhibited.

This defendant, answering, says:

1st. This defendant admits the allegations set forth in paragraphs one, two and five of said bill of complaint.

2nd. This defendant denies each and every allegation set forth in the third paragraph of said bill of complaint.

3rd. This defendant denies having committed adultery, and therefore respectfully avers unto your Honor that the said plaintiff has had nothing to condone so far as this defendant's conduct is concerned.

This defendant having answered said bill of complaint as fully as she is advised it is necessary for her to answer, prays that said bill of complaint may be hence dismissed.

And as in duty bound, etc.,

Harry W. Brooks
Solicitor for defendant.

Lucille Elliott

B Docket 61
441

Circuit Court

James Elliott
1821 Vine St

vs.

Lucia Elliott

Order Counsel Fee and Alimony

Pendente Lite

No. 22852

5 (6)

fd 6 Sept 1921
" 28 " 13 " 4

copy of the within Order of Court served on
James Elliott on the 15th day of September, 1921
in presence of Harry J. Brooks.

Thomas J. Mc Gully
Sheriff

9/15/21

(Brooks)

James Elliott

vs.

Lucia Elliott

-IN THE-
CIRCUIT COURT

-OF-

BALTIMORE CITY

July TERM

ORDERED BY THE COURT this 6 day of September 1921

that the Plaintiff, James Elliott,

pay to the Defendant, Lucia Elliott

the sum of twenty-five Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of five

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

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 21

day of Sept 1921, provided a copy of this Order be served on the said Plaintiff

James Elliott on or before the 15

day of Sept 1921

Robert J. Carter

A copy of the foregoing order having been served upon the defendant as is shown by the Sheriff's return hereon, and no cause to the contrary having been shown, it is this 28 day of September 1921, ordered by the Circuit Court of Baltimore City that the same be, and it is hereby made absolute and final.

Walter Steiner

serve on

James Elliott,
1821 Vine St.

Ct. Ct. 441 B 61
1921

James Elliott

vs.

Lucia Elliott

1821 Vine St

ORDER OF COURT

B 22852

No. B.

(77) (8)

19 Jan

Filed 1921
" 23 "
" 309-13 "

Thomas F. McHully
Sheriff

Thomas F. McHully
Sheriff

Thomas F. McHully
Sheriff

Now East
(Brooks)

(2nd Return)

Now East
(Brooks)

3rd Return

(Now East)
(Brooks)

00

James Elliott
vs.
Lucia Elliott

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this 11 day of January 1922
that the Plaintiff appear before this Court in person,
on the 23 day of January, 1922 at 10 o'clock A. M., and then and there
if any he may have, why he should not be punished for contempt of this Honorable Court in obeying
the Order of this Court passed on the 28th day of September, 1921, directing the
payment of Alimony, pendente lite, by him to the Defendant
provided a copy of this Order be served on the said James Elliott, Plaintiff
on or before the 20 day of January, 1922,

Carroll J. Bond

Not Payable
Flora Pris And asso

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this 30th day of January 1922, that the time for showing cause under said Order be extended to the 6 day of February 1922, and the time for service of a copy of the same be extended to the 4 day of February 1922.

Carroll J. Bond

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this 23rd day of January 1922, that the time for showing cause under said Order be extended to the 30 day of January 1922, and the time for service of a copy of the same be extended to the 28 day of January 1922.

Carroll J. Bond

Serve on

Ct. Ct.

B. 191

James Elliott

vs.

Lucia Elliott

ORDER OF COURT

No. B.

COPY:

Filed 191

JAMES ELLIOTT

vs.

LUCIA ELLIOTT

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this 17th day of January 1922
 that the plaintiff appear before this Court in person,
 on the 23rd day of January 1922, at 10 o'clock 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 28th day of September 1921, directing the
 payment of Alimony, pendente lite, by him to the defendant
 provided a copy of this Order be served on the said James Elliott, plaintiff
 on or before the 20th day of January 1922, 191

CARROLL T. BOND

TRUE COPY
TEST,

Chas R Whiteford CLERK

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this 30 day of January 1922, that the time for showing cause under said Order be extended to the 6th day of February 1922, and the time for service of a copy of the same be extended to the 14 day of February 1922

TRUE COPY
TEST,

Clark Whiteford Clk

Carroll Bond

The foregoing Order having been returned "Non Est" as appears by
the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City
this 23 day of January 1922, that the time for showing cause
under said Order be extended to the 30 day of January 1922,
and the time for service of a copy of the same be extended to the 27 day of
January 1922.

TRUE COPY
TEST,

Chas K. Huleford CK

Carroll F. Goid

Serve on

Ct. Ct.

441 B 61
1921

James Elliott
1821 Vine St
vs. Jantzen School

Lucia Elliott

ORDER OF COURT

922852

No. B.

(10)

Filed

9 Kelly
13

1922

Copy of the within Order of Court served on
James Elliott on the 15th day of February, 1922
in presence of Harry J. Brooks.
Thomas J. M. Gully
Sheriff
Fee \$0.50

time 330p

2/15/22
(Brooks)

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY

James Elliott
vs.
Lucia Elliott

Ordered by the Circuit Court of Baltimore City this 9th day of February 1922,
that the Plaintiff James Elliott appear before this Court in person,
on the 20th day of February, 1922 at 10 o'clock 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 28th day of September 1921, directing the
payment of Alimony, pendente lite, by him to the
provided a copy of this Order be served on the said James Elliott
on or before the 17th day of February 1922.

Carroll J. Bond

~~Pay~~ Not payable through
the Provisional Aid Association

441
Circuit Court

441 61
19 21 B No. Docket.

James Elliot

vs.

Lucia Elliot

Final Order, Counsel Fee and Alimony
Pendente Lite.

B 22852
No. B.

11

Filed 20 July 1922

James Elliott
vs.

Rucia Elliott

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

Term, 19

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;

ORDERED by the Circuit Court of Baltimore City this 20th day

of February 1922, that the Plaintiff

pay to the defendant

(payable to the prison and society)

the sum of fifteen Dollars, as counsel fee

in weekly installments of \$5, each, said installments to begin Apr. 1, 1922 for the Solicitor of the defendant and that he

further pay the sum of Three Dollars per week,

to the said defendant

as Alimony *pendente lite* accounting from the 20th day of Feb. Dec. 1922

and continuing until the day of 19, (should this suit be

so long pending) or until the further order of this Court and attachment determined.

Carroll J. Bond

Serve on

James Elliott,
1821 Vine St.

He is janitor at a
Public School

Mad 2307

In 112 School

Ct. Ct.

441- B $\frac{61}{1921}$

James Elliott

vs.

Lucia Elliott

ORDER OF COURT

D 22852

No. B.

12

Filed

4 May

1922

13

copy of the within Order of court served on
James Elliott on the 10th day of May. 1922,
in presence of Harry J. Brooks.

Thomas F. Mully
Sheriff.

Fees \$0.50

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

James Elliott
vs.
Lucia Elliott

Ordered by the Circuit Court of Baltimore City this 4 day of May, 1922
that the plaintiff, James Elliott, appear before this Court in person,
on the 15 day of May, 1922, at 10 o'clock 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 obey-
ing the Order of this Court passed on the 28th day of September, 1921, directing the
payment of Alimony, pendente lite, by him to the defendant, Lucia Elliott,
provided a copy of this Order be served on the said plaintiff,
on or before the 12 day of May, 1922.

Carroll J. Bond

4 Werts @ 3⁰⁰, in arrears - \$12⁰⁰
Counsel fee, 15⁰⁰
Not payable through Prison aid.
Harry K. Brooks
Sub. for defendant,