

IN THE CIRCUIT COURT OF

63 B 186
BALTIMORE CITY

1923
FLORENCE L. JACKSON

VS.

ALGERNON M.A. JACKSON

BILL FOR DIVORCE.

Mr . Clerk;

Please file.

B 25092
J. Steward Davis
ATTORNEY FOR PLAINTIFF

DAVIS & BISHOP

ATTORNEYS AT LAW

BANNEKER BUILDING

14 E. PLEASANT STREET

BALTIMORE, MD.

H. J. March 1923

3/13/15

FLORENCE L. JACKSON : IN THE CIRCUIT COURT
VS. : OF
ALGERNON M.A. JACKSON : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully says:

- (1) That she was married to her husband, Algernon M.A. Jackson on or about the 9th day of September, 1908 and with whom she resided until about the 17th day of September, 1918.
- (2) That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said Algernon M.A. Jackson.
- (3) That the said Algernon M.A. Jackson, has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned women, whose names to your Oratrix are unknown, and said offense has not been condoned by your Oratrix.
- (4) That there are five children born as result of said marriage: Algernon, Jr. age twelve; Mary, age ten, Randall age, seven, Violet age 6 and Portia age four, for whom the plaintiff asks custody.
- (5). That both your Oratrix and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than two years prior to the filing of this Bill.

(6) Your Oratrix states further, that she is destitute and without funds to defray the expenses of this litigation; further that she is without the means of support for herself and children. She is advised by Counsel that she is permitted to petition this Honorable Court that the defendant shall be compelled to contribute a reasonable amount as alimony pendente lite towards the support of your Oratrix and children, and that she will also be awarded an amount in order to compensate her Solicitor.

Your defendant is employed as clerk in the Post Office and earns an average of sixteen hundred and fifty dollars per year.

TO THE END, THEREFORE:

- a) That your Oratrix may be divorced a Vinculo Matrimonii from the said Algernon M.A. Jackson.
- (b) That she may have such other and further relief as her case may require.
- (c) That this Honorable Court will decree that the defendant pay a reasonable sum as alimony pendente lite and an additional sum as Counsel fee.
- (d) Permanent alimony.
- (e) Right to resume her maiden name, Dandge.

May it please your Honor to grant unto your Oratrix the Writ of Subpoena directed against the said Algernon L. Jackson, 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.

J. Steward Davis
SOLICITOR FOR COMPLAINANT.

63 B Docket 186
1923
CIRCUIT COURT.

Jackson
vs.
Jackson

Order for Alimony
Pendente Lite

ORDER

B No. 25092

\$ (3) (4)
(6) 40 a week
5 children

Fd.: 24 March 1923
2 Apr " "
19 " " 6

Thomas F. M. Maulty Sheriff
Thomas F. M. Maulty Sheriff
Thomas F. M. Maulty Sheriff
Non Est
(2nd Return)
Non Est
3rd Return
Non Est

Florence L. Jackson

vs.

IN THE
CIRCUIT COURT

OF

BALTIMORE CITY

Algernon M. A. Jackson

March TERM, 1923

ORDERED BY THE COURT this 24 day of March 1923

that the defendant Algernon M. A. Jackson

pay to the plaintiff Florence L. Jackson

the sum of ~~forty~~ twenty

Dollars per week, during the continuance of this suit, accounting from the 24

day of March 1923 to the said plaintiff Florence L. Jackson

as alimony, *pendente lite* unless cause to the contrary be shown on or before the 7

day of April 1923, provided a copy of this Order be served on the said defendant

Algernon M. A. Jackson on or before the 31

day of March 1923

Henry Saffery

TRUE COPY—TEST:

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 19 day of April 1923, that the time for showing cause
under said Order be extended to the 3 day of May 1923,
and the time for service of a copy of the same be extended to the 27 day of
April 1923

Henry Saffoy

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 2nd day of April 1923, that the time for showing cause
under said Order be extended to the 17 day of April 1923
and the time for service of a copy of the same be extended to the 12 day of
April 1923

Henry Duffey

B Docket.....

CIRCUIT COURT.

Jackson
.....
Jackson vs.
Jackson
.....

Order for Alimony

Pendente Lite

ORDER

B No......

()

COPY.

Fd.:

IN THE
CIRCUIT COURT

OF
BALTIMORE CITY

FLORENCE L. JACKSON

vs.

ALGERNON M. A. JACKSON

March TERM, 192 3

ORDERED BY THE COURT this 24th day of March 192 3

that the defendant Algernon M. A. Jackson

pay to the plaintiff Florence L. Jackson

the sum of Twenty

Dollars per week, during the continuance of this suit, accounting from the 24th

day of March 192 3 to the said plaintiff Florence L. Jackson

as alimony, *pendente lite* unless cause to the contrary be shown on or before the 7th

day of April 1923, provided a copy of this Order be served on the said defendant

Algernon M. A. Jackson on or before the 31st

day of March 192 3

HENRY DUFFY

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 19 day of April 1923, that the time for showing cause under said Order be extended to the 3 day of May 1923, and the time for service of a copy of the same be extended to the 27 day of

April 1923

True Copy Test
Clark Whitford c/s Henry Duffly

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 2 day of april 1923, that the time for showing cause
under said Order be extended to the 17 day of april 1923,
and the time for service of a copy of the same be extended to the 12 day of

april 1923

True Copy Test

Clara R. Whiteford Cl

Henry W. Duffy

217-248

186263

Ct. Ct.

192 3 Docket No.

Jackson
Jackson

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. ^B 25092.
^{Pro}

Filed ⁽²⁾⁽⁵⁾ ^{9 apue} 1923
^{J. S. Davis} SOLICITOR
" ^{14 May}
^B

Non Est

Thomas F. Meryault
Sheriff

4/12 1923

REISSUED TO My Return Day, 1923

Chas. R. Whitford
Clerk

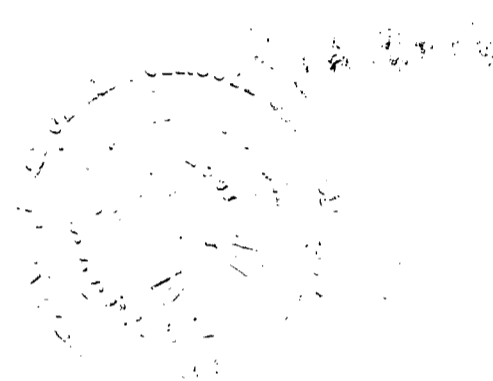
Now Est
Thomas F. Meryault
Sheriff

EQUITY SUBPOENA

The State of Maryland

To

Algernon M. A. Jackson



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 **April** next cause an appearance to be entered for you and your answer to be filed to the complaint of

Florence L. Jackson

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 **March** 192**3**

Issued the **22** day of **March**, in the year 192**3**

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.)

Ct. Ct.

192

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed 192

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

To

Algernon M. A. Jackson

Seal

REISSUED TO *May* ^{4/12} 1923
Return Day, 1923
Chas R Whiteford
Clerk

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 April next cause an appearance to be entered for you and your answer to be filed to the complaint of

Florence L. Jackson

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 March 1923

Issued the 22 day of March, in the year 1923

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.)