

IN THE
CIRCUIT COURT OF
BALTIMORE CITY.

B 438
1927

LEWIS FORD

VS.

--IDA FORD.

1806 Baltimore St -

Bill for Divorce

--A VINCULO MATRIMONII--

B32200

Mr: Clerk:

Please file &c.

Sol: for Plaintiff.

[Handwritten signature]

ROY S. BOND
ATTORNEY AT LAW
220 ST. PAUL PLACE
BALTIMORE, MD.

8 Sept 1927

FILED

THE DAILY RECORD COMPANY
BALTIMORE, MD.

LEWIS FORD

IN THE

VS.

--CIRCUIT COURT OF--

IDA FORD

BALTIMORE CITY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

Your Orator- LEWIS FORD- complaining, respectfully says:

(1). THAT HE WAS MARRIED to his wife, IDA FORD, in Baltimore City, State of Maryland, on or about the 17th day of October, 1917, with whom he resided until on or about the 15th day of August, 1922.

(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 THOUGH THE CONDUCT of your Orator towards his said wife- IDA FORD- has been kind, affectionate and above reproach in all respects, she, without just cause or reason, abandoned and deserted him and has declared her intentions to live with him no more; that such abandonment has continued uninterruptedly for more than three years, is deliberate and final, and beyond any reasonable hope or expectation of a reconciliation.

(4). THAT THE DEFENDANT, Ida Ford, 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 cohabited with the defendant or condoned the said offense since he discovered the same.

(5). THAT THERE ARE no children as issue of said marriage.

WHEREFORE YOUR ORATOR PRAYS-

-a- A divorce- A VINCULO MATRIMONII-
from the defendant- IDA FORD--

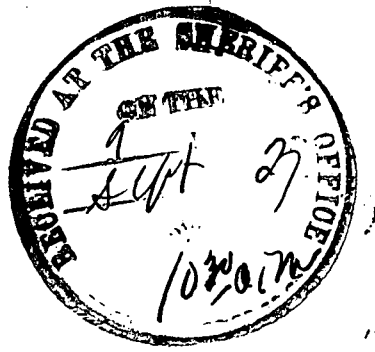
-b- Such other and further relief as the
case may require.

MAY IT PLEASE YOUR HONOR, to grant unto your
Orator- LEWIS FORD- the writ of subpoena, directed unto the said
defendant- IDA FORD- residing 1806 Division St., 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.,



SOLICITOR FOR PLAINTIFF.



B438

1927

Docket No.

Jessie Ford

B 339 Ct. Ct.

W

Jessie Ford.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B 32200 (27)

Filed

13 Sept

1927

Ray J. Bond
SOLICITOR

Summoned and a copy of the Process left with the Defendant

Lyett
(9/9/27)

John E. Potee
Sheriff

Fees \$0.95

EQUITY SUBPOENA

The State of Maryland

On

Ida Ford
1806 Division 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

Lewis Ford.

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 *11* day of *July* 192*7*
Issued the ~~*8*~~ *8* day of *September*, in the year 192*7*

Charles 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.

Sernon Boyd Bond
attorney - 220 St Paul
Place

~~272~~

438-1927
In The Grand Court
No 207
Baltimore City

Lewis Ford B 438
1927
60

Ira Ford
B 32200
(3)

Answers to brief
complaint

Mr Clerk please file

Davis & Evans
attorneys

9d 20 Sept 1927

DAVIS & EVANS
ATTORNEYS AT LAW

Filed 20th September 1927

3/13/2/53

LEWIS FORD

VS.

IDA FORD

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*

*
*

IN THE

CIRCUIT COURT ~~MD~~

BALTIMORE CITY

TO THE HONORABLE- THE JUDGE OF SAID COURT:

Your Respondent, answering the Bill of the above Plaintiff, exhibited, respectfully says:

1. That she admits the allegations as contained in the first (1) paragraph of the Bill of Complaint.
2. That she admits the allegations as contained in the second (2) paragraph of the Bill of Complaint.
3. That she denies most emphatically the allegations contained in the third (3) paragraph of the Bill of Complaint.
4. That she denies most emphatically the allegations contained in the fourth (4) paragraph of the Bill of Complaint.
5. That she admits the allegations as contained in the fifth (5) paragraph of the bill of complaint.
6. That your respondent is destitute and without the means of defraying the expenses of this suit; that she is advised by counsel that she is entitled to petition this Honorable Court pass an order allowing your respondent a sum certain to compensate her soliditor and as alimony pendente lite; that the complainant is employed and earns approximately \$25.00 per week.

WHEREFORE YOUR RESPONDENT PRAYS:

- (a) Alimony pendente lite.
- (b) Counsel fee.
- (c) That the bill be dismissed with cost to the complainant.

*Doris v Evans
attorneys-at-law*

Done on
Roy S Bond
Per

RECEIVED AT
THE SHERIFFS OFFICE ON

SEP 21 1927 3 06 PM

Docket

1927

Circuit Court

Lewis Ford

VS.

Jada Ford

Order Counsel Fee and Alimony

Pendente Lite

B No. 32200

(4)

FD 21 Sept 1927

copy of the within Order of Court served
on Roy S. Bond Solicitor for the defendant
on the 22th day of September 1927 in
presence of Adam S. Buck

Dues \$0.75

John E. Peters
Sheriff

Lewis Ford

vs.

Ida Ford

—IN THE—

CIRCUIT COURT

—OF—

BALTIMORE CITY.

September TERM

ORDERED BY THE COURT this 21st day of September 1927

that the Plaintiff Lewis Ford

pay to the Defendant Ida Ford

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

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

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

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 6

day of October 1927 provided a copy of this Order be served on the said Plaintiff

Lewis Ford or his Solicitor on or before the 28th

day of September 1927.

H. Arthur Stump

TRUE COPY—TEST:

CLERK

B438/1927

IN THE
CIRCUIT COURT OF
BALTIMORE CITY.

B 438
1927

LOUIS FORD

VS.

--IDA FORD.--

B 32200
757

ANSWER TO PETITION
FOR ALIMONY AND
COUNSEL FEE.

Mr: Clerk:

Please file &c.,

Roy S. Bond
Sol. for Respondent.

ROY S. BOND
ATTORNEY AT LAW
220 ST. PAUL PLACE
BALTIMORE, MD.

FILED

24 Sept 1927

LOUIS FORD

-- IN THE

VS.

-- CIRCUIT COURT OF--

IDA FORD--

BALTIMORE CITY.

TO THE HONORABLE- THE JUDGE OF SAID COURT:

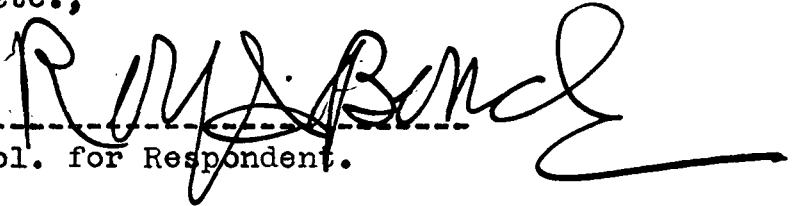
Your Respondent, Louis Ford, through and by his Solicitor- Roy S. Bond, in answer to petition for alimony and Counsel fee which was served on his Solicitor, Roy S. Bond, respectfully says:

(I). THAT AN ORDER for alimony was passed only last week by his Honor, Judge Ullman, sitting in Criminal Court, Part 2, of Baltimore City, allowing the defendant alimony in keeping with her station in life, and in keeping with your Respondent's earnings, and that he is unable to ^{further} pay alimony and Counsel fee, ~~regardless~~ as to how eager he may be to comply with the order of this Honorable Court.

Having answered in so far as he is advised is necessary, he respectfully prays that the petition heretofore filed be dismissed and the order thereon vacated.

As in duty bound etc.,

Sol. for Respondent.



STATE OF MARYLAND
BALTIMORE CITY - to wit-

I HEREBY CERTIFY THAT on this - 23rd- day of Sep-
tember, 1927, before me the subscriber, a Notary Public, of the
State of Maryland, in and for Baltimore City, personally appeared
-ROY S. BOND, Solicitor for - LOUIS FORD- Respondent, and made
oath in due form of law, that the matters 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.

Eleanor S. Wright

NOTARY PUBLIC.

Circuit Court ~~No. 2~~

438
192 7 DOCKET..... No. 67B

LEWIS FORD

vs.

IDA FORD.

Petition for leave to take Testimony
and Order of Court thereon

Dapp

B No. 32200
(6)

Filed 14 Oct 1927

LEWIS FORD

IN THE

Circuit Court No. 2

vs.

IDA FORD.

-OF-

BALTIMORE CITY

To the Honorable the Judge of the
Circuit Court No. 2 of Baltimore City:

THE PETITION OF --- LEWIS FORD-- Plaintiff

in this case, respectfully shows that -- he----- desire s----- to take testimony in this case, and respectfully pray s----- that leave be granted --him---- to do so before one of the Standing Examiners of this Court.

R. M. B. M. D.
Solicitor for Plaintiff.

ORDERED, this 14th day of October 1927, that leave be granted to the parties to the cause, to take testimony, as prayed, before any one of the Standing Examiners of this Court.

H. Arthur Plunkett