

IN THE CIRCUIT COURT OF
BALTIMORE, CITY.
19207
1925 *65-13*

GEORGE W. GAINES

VS.

LAURA GAINES.

826 Sterling St

BILL FOR DIVORCE.

B-285-87

Mr. Clerk:

17
Please file.

Davis Evans
ATTORNEYS FOR PLAINTIFF.

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

Feb 19 - 17 Mch 1925

GEORGE W. GAINES

:

IN THE CIRCUIT COURT

VS.

:

OF

LAURA GAINES

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents;

- I. That he was married to his wife, Laura Gaines, on the 28th day of May, 1885 and with whom he resided until about the 13rd day of September, 1920, when the defendant deserted the plaintiff.
2. That though the conduct of your Orator toward the said Laura Gaines has always been kind, affectionate and above reproach, she has, without any just cause or reason abandoned and deserted him and has declared her intention to live with him no longer, and that such abandonment has continued uninterruptedly for more than three years and is deliberate and final, and the separation of the parties is beyond any reasonable expectation of reconciliation.
3. That your Orator has not lived or co-habited with the said defendant since said desertion.
4. That there are seven children, six who are of age and one Orra Gaines, who is seventeen years of age.
5. That both your Orator and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this Bill of Complaint.

TO THE END, THEREFORE:

(a) That your Orator may be divorced A Vinculo Matrimonii from the said Laura Gaines.

(b) That he 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 against the said Laura Gaines commanding and requiring her 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.


SOLICITORS FOR COMPLAINANT.

P 14

Ct. Ct.

B 207
192 5

Docket No.

Gaines

vs.

Gaines

826 Starling St

SUBPOENA TO ANSWER BILL OF COMPLAINT

PW

No.

B 28587

{ 2 }

Filed 31st March 192 5

Davis & Evans

SOLICITORS

4

Summoned and a copy of the Process left with the defendant John C. Potee Sheriff
(Moylan) 3-21-25
Fees \$0.80

3/13/25

THE STATE OF MARYLAND
COURT OF COMMON PLEAS

EQUITY SUBPOENA

The State of Maryland

On Laura Gaines

(826 Sterling 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 April next cause an appearance to be entered for you and your answer to be filed to the complaint of George W. Gaines

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 9th day of March 1925 Issued the 19th day of March, in the year 1925

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.

IN THE CIRCUIT COURT OF

Baltimore City.
B207 *65B*
1925 *207*

GEORGE W. GAINES

VS.

LAURA GAINES.

ANSWER.

Mr. Clerk:

Please file, etc.
Meyer Reamer
Solicitor for Respondent.

B28587
(3)

MEYER REAMER

223-25 ATTORNEY AT LAW
EQUITABLE BUILDING

BALTIMORE, MD.
Filed April 1925

George W. Gaines

vs.

Laura Gaines

In the Circuit Court

of

Baltimore City.

To the Honorable, the Judge of said Court:

The Answer of Laura Gaines, Respondent, in the above entitled cause to the Bill of Complaint heretofore exhibited against her respectfully says:

1st. Answering the first paragraph of said Bill of Complaint, Your Respondent admits that she was married to the Complainant on the 28th day of May, 1885 and resided with him until about the third day of September, 1920, but emphatically denies that Your Respondent deserted the Plaintiff.

2nd. Answering the second paragraph of said Bill of Complaint, Your Respondent denies the allegations as therein stated, but on the contrary avers that Your Complainant deserted Your Respondent without any just cause or reason, and that Your Respondent has always been a kind and affectionate wife towards Your Complainant.

3rd. Answering the third paragraph of said Bill of Complaint, Your Respondent neither admits nor denies the allegations therein stated but demands strict proof thereof.

4th. Answering the fourth and fifth paragraphs of said Bill of Complaint, Your Respondent admits the allegations therein stated.

Having fully answered said Bill of Complaint and all of the allegations thereof this Respondent prays the same may be dismissed with costs.

And as in duty bound, etc.

Laura X. Gaines
Respondent.

Meyer Reamer
Solicitor for Respondent.

IN THE CIRCUIT COURT OF

B207
1925 BALTIMORE CITY. *650*
207

GEORGE W. GAINES

VS.

LAURA GAINES.

PETITION.

Mr. Clerk:

Please file, etc.

Meyer Reamer
Solicitor for Petitioner

B 28587
(4)

MEYER REAMER

ATTORNEY AT LAW

223-25 EQUITABLE BUILDING

BALTIMORE, MD.

Filed 9th April 1925

George W. Gaines

vs.

Laura Gaines

In the Circuit Court

of

Baltimore City.

The Petition of Laura Gaines, the Defendant in the above entitled case respectfully represents unto Your Honor as follows:-

1st. That heretofore she was sued in this Honorable Court for a divorce a vinculo matrimonii by the Plaintiff, her husband, on the ground of desertion.

2nd. That Your Petitioner has answered the Bill of Complaint denying said charge and has shown that the Plaintiff is not entitled to the relief he seeks.

3rd. That Your Petitioner is destitute and has no means of support for herself, nor to compensate her counsel for his services in representing her in this cause.

4th. That the Plaintiff is a porter and does other work in addition and is able to earn at least Twenty-Five (\$25.00) Dollars per week.

Wherefore Your Petitioner prays that an Order be passed by this Honorable Court directing the Plaintiff to pay her alimony pendente lite for herself, as well as a reasonable sum for a counsel fee for her solicitor of record in this cause.

And as in duty bound, etc.

Laura ^{Laura} ~~Gaines~~ ^{Gaines}..
Petitioner.

Meyer Reamer...
Solicitor for Petitioner.

State of Maryland, City of Baltimore, to wit:

I hereby certify that on this 8th day of April, 1925, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared Laura Gaines, Petitioner, and she made oath in due form of law that the matters and facts contained in the foregoing Petition are true and bona fide as therein set forth to the best of her knowledge, information and belief.

As witness my hand and Notarial Seal.

Glorance Lewis
.....
Notary Public.

B 65 Docket 207
1925

Circuit Court

Gaines

VS.

Gaines

Order Counsel Fee and Alimony

Pendente Lite

B No. 28557

157

(6)

Ed Payne 1925

30 3 4

Copy of the within Order of Court served on
George W. Gaines on the 14th day of April 1925
in presence of Adam S. Buck

John E. Potce
Sheriff

Fees \$0.50

928 h Guy

George W. Gaines

vs.

Laura Gaines

—IN THE—

CIRCUIT COURT

—OF—

BALTIMORE CITY

March

TERM

ORDERED BY THE COURT this 9 day of April 1925

that the Plaintiff George W. Gaines

pay to the Defendant Laura Gaines

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 Laura Gaines

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 24

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

George W. Gaines on or before the 30

day of April 1925

George A. Salter

TRUE COPY—TEST:

CLERK

Serve on

Thomas Drug
Store, Asquith &
Gay sts

Ct. Ct. B 65-207
1925

Gaines

vs.

Gaines

ORDER OF COURT

B28587

No. 17 B.

Filed 1st May 1925
3

Copy of the within Order of Court read on George W. Gaines on the 2nd day of May, 1925, in the presence of Maurice L. Yaffe.

John E. Potee
Sheriff

Fees \$0.50

George W. Gaines

vs.

Lama Gaines

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this 1 day of May 1925
that the Plaintiff appear before this Court in person,
on the 5 day of May, 1925, 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 — day of —, 19 —, directing the
payment of Alimony, pendente lite, by him to the Defendant
provided a copy of this Order be served on the said Plaintiff
on or before the 4 day of May, 1925

Charles P. Sker

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 30 day of April 1925, ordered by the Circuit Court of Baltimore City that the same be, and it is hereby made absolute and final.

George A. Salts

Serve on

Geo W. Gaines
of James Drug
Store
Crispith & Gayst

Ct. Ct.

B $\frac{207}{1925}$

Gaines

vs.

Gaines

ORDER OF COURT

28-587

No. B.

Filed 192

Gaines
vs.
Gaines

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this April day of 1925
that the Plaintiff Geo. W. Gaines appear before this Court in person,
on the 5th day of May, 1925, 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 April, 1925, directing the
payment of Alimony, pendente lite, by him to the Defendant Laura Gaines
provided a copy of this Order be served on the said Plaintiff, Geo. W. Gaines.
on or before the _____ day of _____, 19__ .

CIRCUIT COURT

207
192 **B**

No. **658** Docket.

George W. James

vs.

Laura James

Final Order, Counsel Fee and Alimony

Pendente Lite.

No. **28587** **B**

87

Filed

May

1925

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

George W. James
vs.
Rena James

Term, 192.....

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 5th day of May 1925, that the plaintiff pay to the defendant the sum of Twenty five Dollars, as counsel fee for the Solicitor of the defendant, payable at rate of \$5.00 per wk. and that he further pay the sum of Three Dollars per week, to the said..... as Alimony *pendente lite* accounting from the 5th day of May 1925 and continuing until the..... day of..... 192....., (should this suit be so long pending) or until the further order of this Court.

George A. Salter

Serve on

George W. Gaines
Co Francis Dugpton
Cor Gay & Disquith Sts

Ct. Ct.

B 207
1925

Gaines

VS.

Gaines

ORDER OF COURT

No. 28587 B.

297

Filed

22nd Sept
3

1925

Copy of the within Order of Court served on George W. Gaines
on the 26th day of September 1925 in presence of

Thomas S. Buck

Dec \$0.50

John E. Potter
Sheriff

George W. Gaines
vs.
Laura Gaines

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this 22nd day of Sept 1925
that the Complainant, George W. Gaines appear before this Court in person,
on the 5th day of October, 1925, 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 5th day of May, 1925, directing the
payment of ~~Attorney's~~ Counsel fee ~~pendente lite~~, by him to the Defendant's Solicitor, Meyer Reamer
provided a copy of this Order be served on the said George W. Gaines
on or before the 29 day of September, 1925

James P. Gorten