

3/12/1904

In The Circuit Court  
of  
Baltimore City 1922

James E. Gibson

vs  
Isabella Gibson

Brief for James E. Gibson

Mr Clerk please file

*(Signature)*

B 23497  
(1)

J. Steward Davis  
DAVIS & BISHOP  
ATTORNEYS AT LAW  
BANKERS BUILDING  
BALTIMORE, MD.  
*J. Steward Davis* 1922  
215 Courtland St.

JAMES E. GIBSON : IN THE CIRCUIT COURT ~~NO. 100~~

VS. : OF

ISABELLA GIBSON : BALTIMORE CITY.

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:-

FIRST: That he was married to his wife, Isabella Gibson, on January 27, 1917 and with whom he resided in Baltimore City until about the 16th day of August, 1917.

SECOND: That ever since said marriage your Orator has behaved himself as a faithful, chaste and affectionate husband toward the said Isabella Gibson.

THIRD: That the said Isabella Gibson has on divers days and times since the said marriage, committed the crime of adultery with divers, lewd and abandoned men in Baltimore City, whose names to your Orator are unknown, and said offense has not been condoned by your Orator.

FOURTH: That there are no children as result of said marriage.

FIFTH: That your Orator has not lived nor cohabited with the said Isabella Gibson since he discovered her adultries.

SIXTH: 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.


TO THE END, THEREFORE:

(a). That your Orator may be divorced a Vinculo Matrimonii from the said Isabella Gibson.

(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 Isabella Gibson 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.

  
SOLICITOR FOR COMPLAINANT.

385-400

108 B62

Ct. Ct.

192 2

Docket No.

Gibson

Gibson

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B  
23497

(2) (3)

Filed

15 March 192 2

J. S. Davis

SOLICITOR

fd 103 April 1922

Thomas F. M. Gaulty  
Sheriff

3/15 1922

REISSUED TO Apule

Robert D. 1922  
East W. Hulstford

Thomas F. M. Gaulty  
Sheriff

New Est

New Est

EQUITY SUBPOENA

The State of Maryland

To

*Isabella Gibson*

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

*James E. Gibson*

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~~ <sup>JAMES P. CORTER</sup> Chief Judge of the Supreme Bench of Baltimore City, the **9th** day of ~~January~~ <sup>March</sup> 192**2**  
Issued the **2** day of ~~February~~, in the year 192**2**

**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

Isabella Gibson

(L.S.) 1622 & Monument

3/15 1922

REISSUED TO

Alpine

Return Day 1922

Chas R Whiteford

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

James E Gibson

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 9th day of January 1922

Issued the 21 day of March, in the year 1922

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.)