

In The Circuit Court
of B 338
Baltimore City 1921

Gusso Lee Johnson

vs

John W. Johnson

537 Wash St

Petition for Divorce & Alimony

Mr. Clerk please file

J Davis

B 226 55

1

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

8 July 1921

Gussie Lee Johnson : In The Circuit Court
vs. of
John H. Johnson : Baltimore City.

To The Honorable, The Judge of Said Court:

Your oratrix complaining respectfully states:-

FIRST, that the parties hereto were married on or about February 2nd. 1921, by Rev. Douglas in Baltimore City Maryland and lived together as man and wife until on or about June 13, 1921.

SECOND, that the defendant is a resident of 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 oratrix toward her husband has always been kind, affectionate and above reproach, he without any just cause or reason abandoned and deserted your oratrix. That the said desertion has continued uninterruptedly for more than three years.

FOURTH, That your oratrix has never condoned nor forgiven the said desertion, that she has never cohabited with the said respondent since the desertion.

FIFTH, That there are no children born as a result of said marriage.

SIXTH, that your oratrix is without means with which to defray the expenses of this litigation; that she is advised by counsel that she is entitled to have an order passed by this Honorable Court awarding her a sum certain as alimony during the progress of this suit and a further sum to compensate her solicitor for his services in the cause.

THEREFORE YOUR ORATRIX PRAYS:

a-a A divorce A Mensa et thora

Such other and further relief as the case may require.

c-c Permanent alimony

d-d Counsel fee and alimony pendente lite.

May it please Your Honor to grant unto your orator a writ of Subpoena, directed unto the said respondent, commanding him to be or appear in this Court on some day certain to be named therein to perform such decree as may be passed in the premises.

As in duty bound, etc.

Johnson
Gusriedee, Rogers
Complainant.

[Signature]
Solicitor For Complainant

City of Bacton } Toland,
State of Ind

I, Notary Public in and for the County of Bacton, State of Ind, hereby certify that on this 6th day of July, personally appeared Gusriedee Johnson who made oath in due form of law that the facts as stated in above petition were true to the best of his knowledge and belief

x Caroline Murray
Notary Public

125-134

330361

Ct. Ct.

1921

Docket No.

Johnson
Johnson

John W.

Pro

SUBPOENA TO ANSWER BILL OF COMPLAINT

B 537 Mosher St
No. 22655
(2) (4)

Filed

12 July

1921

J S Davis

SOLICITOR

11

Non Est.

Thomas A. McKeeth
Sheriff.

(Attached)

July 13 - 1921

Subpoena re - used to August returned

Charles R. Whiteford
CR

2nd return.

Summoned and a copy of the process left
with the defendant -

Thomas A. McKeeth

Sheriff.

(Attached)
7/18-21

Fees \$0.80

EQUITY SUBPOENA

The State of Maryland

To

John H. Johnson

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

Gus Lee Johnson

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 **May** 192 **1**

Issued the *J* day of **July**, 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.)

61 B Docket 338
1921

CIRCUIT COURT.

John H. Johnson
vs.
Johnson
537 Mosher St.

Order for Alimony

Pendente Lite

ORDER

B No. 22655
(3)

\$25 a week
1 child
Fd.: 9 July 1921

Copy of the within Order of Court received on
John H. Johnson on the 18th day of July 1921.
in the presence of Alexine R. Ketchum -
Thomas A. McEntally
Sheriff -
Fees \$10.50

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

Gussie L Johnson

vs.

John H. Johnson

May

TERM, 1921

ORDERED BY THE COURT this 9th day of July 1921

that the defendant

pay to the plaintiff

the sum of

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

day of July 1921 to the said plaintiff

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

day of July 1921, provided a copy of this Order be served on the said defendant

day of

July 1921

John H. Johnson on or before the

20

Charles H. Hester

TRUE COPY—TEST:

CLERK

In The
Circuit Court of
Baltimore City.

338
1921

3/12/14/40

Gussie L. Johnson

vs.

John H. Johnson.

ANSWER.

Mr. Clerk:

Please file, etc.,

W. H. Pairo
Sol. for Dft.

1322655
L57

WILLIAM HARRY PAIRO
ATTORNEY-AT-LAW
1208 PENNSYLVANIA AVE.
BALTIMORE, MD.

Filed 25" July 1921

Gussie L. Johnson *
**
vs *
John H. Johnson. *
47

In The
Circuit Court of
Baltimore City.

July term, 1921.

To The Honorable, The Judge of Said Court:

The Answer of the Defendant to the Bill of Complaint filed in this cause, respectfully sets forth as follows:

FIRST: That he admits the marriage and residence of the parties hereto as the same is therein set forth. That he denies each and every other allegation contained therein and demands full, formal and complete proof thereof.

WHEREFORE having duly answered said Bill as fully as he is advised is necessary or material he prays the same may be hence dismissed.

And as in duty bound will ever pray, etc.,



Solicitor for Defendant.

Defendant.

In The ^{B 338}
Circuit Court of ¹⁹²¹
Baltimore City.

Gussie L. Johnson

vs.

John H. Johnson.

ANSWER TO ORDER NISI.

Mr. Clerk:

Please file, etc.,

W. H. Pauro

Sol. for Deft.

B. 22655
467

WILLIAM HARRY PAIRO
ATTORNEY-AT-LAW
1208 PENNSYLVANIA AVE.
BALTIMORE, MD

Filed 25 July 1921

Gussie L. Johnson *
vs. *
John H. Johnson. *

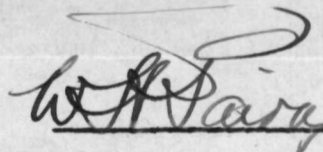
In The
Circuit Court of
Baltimore City.

July term, 1921.

To The Honorable, The Judge of Said Court:

The Answer of the Defendant to the order nisi for alimony pendente lite respectfully sets forth as follows:
FIRST: That owing to the scarcity of work your orator is utterly unable to comply with the order dated July 9th 1921 requiring him to pay unto the plaintiff the sum of Eight dollars per week accounting from the said 9th day of July, and requests that he may have his day in Court wherein he may be able to show unto Your Honor why he cannot and should pay unto the plaintiff the aforementioned sum.

And as in duty bound will ever pray, etc.,

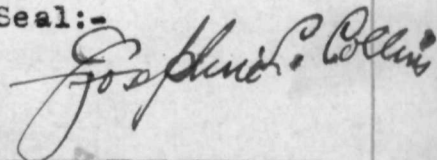


Solicitor for Defendant.

Defendant.

Sworn to before me, this 23rd day of July, 1921, by John H. Johnson.

Witness my hand and Notarial Seal:-



Notary Public.

J. S. Harris

338 Bl Ct. Ct.
19 21 No. Docket.

Gessie Lee Johnson

vs.

John W. Johnson

MOTION FOR HEARING

B 22655
No. 7

Filed 17 day of Aug 19 21

W. A. Paine

Jessie Lee Johnson

vs.

John H. Johnson

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The *plaintiff* by *Steward Davis*
her Solicitor applies to have the above entitled cause placed on the Trial

Calendar for hearing *on alimony*

in conformity with the First Equity Rule.

(Steward Davis)
Solicitor for *plaintiff*.

Serve on

W.H. Pairo

338
1921 No. 61 Docket

Ct. Ct.

Gussie Lee Johnson

vs.

John H. Johnson

NOTICE OF HEARING

B 22655
No.

(8)
No.

Filed 17 day of Aug 1921

10

Copy of the within Notice served on W. H. Pairo
Solicitor, on the 17th day of August, 1921.
in presence of Edward P. Wolf.
Free \$0.50 Thomas J. M^cInty Sheriff

CLERK OF COURT

GUSSIE LEE JOHNSON

VS.

JOHN H. JOHNSON

IN THE

CIRCUIT COURT

OF BALTIMORE CITY

Upon application made by the Solicitor for the PLAINTIFF

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*the above entitled cause has been placed upon the trial Calendar in
accordance with the provisions of the First Equity Rule, and the
same will stand for hearing on alimony*

.....

.....

when reached in due course on said Calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court