

B 277/1923

In the
Circuit Court No. 2
of
Baltimore City

Harry Green

vs

Martha Green

#1008 W. Lexington St

Bill of Complaint

Mr. Clerk:-

Please file.

Wm C. McCord
att'y for Plaintiff

No 22893 B

WILLIAM C. McCARD
ATTORNEY AT LAW
BALTIMORE, MD.

Jd 11 June 1923

Harry Green) In the
vs) Circuit Court No. 2
Martha Green) of
) Baltimore City

TO THE HONORABLE THE JUDGE OF SAID COURT:-
YOUR ORATOR HUMBLY COMPLAINING SAYS:-

First:

That on or about the 2nd. day of May 1918 he was married to his wife, Martha Green and that he resided with his wife until on or about the 5th. day of January 1920.

Second:

That Your Orator has been an actual resident of the State of Maryland for more than two years last passed preceeding the filing of this Bill of Complaint.

Third:

That one child, namely, Katherine Elizabeth, aged 5 years, was born as a result of this union.

Fourth:

That ever since their said marriage Your Orator has behaved himself as a faithful, chaste and affectionate husband toward the said Martha Green, the defendant, but that the said Martha Green on divers days and times since their said marriage to-wit, between the 5th. day of January 1920 and the filing of Your Orator's Bill of Complaint has committed the crime of adultery with one John Robinson in the City of Baltimore, Maryland.

Fifth:

That Your Orator has not lived or cohabited with the said Martha Green, the defendant since he has discovered her said adulteries.

TO THE END THEREFORE:

- a. That Your Orator may be divorced a vinculo matrimonii from the said Martha Green, defendant.
- b. That Your Orator may be awarded the care and custody of the infant daughter, Katherine Elizabeth, daughter of the said parties hereto.
- c. That Your Orator 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 to the said Martha Green residing in Baltimore City, commanding her to be and appear in this Honorable Court on some certain day to be named therein, in person or by solicitor, to answer the premises and show cause, if any she may have, why a decree ought not be granted as prayed.

AND as in duty bound, etc.

Wm. C. McCord
Solicitor for Complainant

16

Ct. Ct. No 2

277
1923

B

Docket No. 32

Green

vs.

Green

Subpoena to Answer Bill of Complaint

Om

No. 22893 B

2

Copy = copied

Filed 22 June, 1923

Wm C McCard

Solicitor.

9

PL 2471

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

Thomas A. McCall
Sheriff

(Ring)
6/13.23

EQUITY SUBPOENA
The State of Maryland

To

Martha Green *SP 4/13/23 (Army)*
1008 N. Lexington 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 *July*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Harry Green

against you exhibited in the CIRCUIT COURT No. 2 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 *14* day of *May*, 192*3*

Issued the *14* day of *June* in the year 192*3*.

John Perasanto

Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

B 277/1923

IN THE CIRCUIT COURT NO. 2

OF

BALTIMORE CITY

MARTHA GREEN

VS.

HARRY GREEN

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

J. Steward Davis
ATTORNEY FOR RESPONDENT.

No 22893 B
3

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

Filed June 1923

MARTHA GREEN : IN THE CIRCUIT COURT NO. 2
VS . : OF
HARRY GREEN. : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of the respondent in the bill of the above case exhibited is as follows:-

1. He admits the statements contained in the first paragraph of the Complainant's Bill of Complaint.
2. He admits the statements contained in the second paragraph of the Complainant's Bill of Complaint.
3. He admits the statements contained in the third paragraph of the Complainant's Bill of Complaint.
4. He denies with great emphasis the allegations contained in the fourth paragraph of the complainant's Bill of Complaint.
5. He neither admits or denys the fifth paragraph of the Complainant's Bill of Complaint.

WHEREFORE the respondent prays that the Complainant's Bill be dismissed.

J. Steward Davis
ATTORNEY FOR RESPONDENT.

IN THE CIRCUIT COURT NO.2

OF *B 277*
1923

BALTIMORE CITY

Navy
MARTHA GREEN

VS.

Martha
MARTHA GREEN

1107 Harlem Ave.

Petition for Alimony &
~~RESPONDENT'S ANSWER~~

Mr. Clerk:-

Please file.

J. Steward Davis
ATTORNEY FOR RESPONDENT.

70 22 73 B
H

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

July 31 1923

3/19/13

Harvey
~~MARTHA GREEN~~

IN THE CIRCUIT COURT NO. 2

VS.

: :

OF

Martha
~~HARRY GREEN~~

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your respondent respectfully says, that on the *11th* day of *June* 1923, the Orator filed in this Honorable Court a bill of complaint praying a divorce a Vinculo Matrimonii. On the *27th* day of *June* 1923 your respondent filed an answer to the aforementioned bill of complaint; that your respondent is destitute and without means with which to support herself and child; that your Orator is employed and receives a salary to the amount of twenty-five dollars per week; that your respondent is advised that she is entitled to receive from the orator a sum sufficient for the support of herself and child and a sum to compensate her Solicitor in defending this suit.

WHEREFORE YOUR RESPONDENT PRAYS:

- (a) Alimony pendente lite.
- (b) Counsel fee for her Solicitor.
- (c) Permanent alimony.

May it please your Honor to issue an order on the Orator commanding him to pay the respondent a reasonable sum as alimony pendente lite and a reasonable sum to compensate her solicitor.

AND as in duty bound etc.,

J. Steward Davis

ATTORNEY FOR RESPONDENT.

June on
Harry Green
1107 Harlan Ave

non est

32 B Docket 277/1923

CIRCUIT COURT No. 2

Green

vs.

Green

1107 Harlan Ave

Order Counsel Fee and Alimony

Pendente Lite

Husband Plaintiff

ORDER

No. 22893 B.

(5).

copy copied

Filed 1 August 1923

13

Thomas F. McQuilty
Sheriff

non est
(same)

IN THE

CIRCUIT COURT No. 2

OF

BALTIMORE CITY

Harry Green

vs.

Martha Green

July, TERM, 1923

ORDERED BY THE COURT, this *1* day of *August* 1923

that the Plaintiff *Harry Green*

pay to the Defendant *Martha Green*

the sum of *Nine* ^{*00*} Dollars as Counsel Fee for the

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

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

Martha Green

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the *16*

day of *August* 1923, provided a copy of this Order be served on the said Plaintiff

Harry Green on or before the *6*

day of *August* 1923

Carroll J. Bond

TRUE COPY—TEST:

*\$25. per week
1 child*

Clerk.

32. B Docket 277/1923

CIRCUIT COURT No. 2

Green

vs.

Green

Order Counsel Fee and Alimony

Pendente Lite

Husband Plaintiff

ORDER

No. () B.

Copy

IN THE

CIRCUIT COURT No. 2

OF

BALTIMORE CITY

Harry Green

vs.

Martha Green

July

, TERM, 1923

ORDERED BY THE COURT, this *1* day of *August* 1923

that the Plaintiff *Harry Green*

pay to the Defendant *Martha Green*

the sum of *Nine⁰⁰* Dollars as Counsel Fee for the

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

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

Martha Green

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

day of *August* 1923, provided a copy of this Order be served on the said Plaintiff

Harry Green on or before the *6th*

day of *August* 1923

Carroll T. Bond

TRUE COPY—TEST:

John Pleasants

Clerk.

Deemed
Harry Green
or
Wm C. McCord Attorney

32 B Docket 277
1923

CIRCUIT COURT No. 2

Harry Green
vs.
Martha Green

Order Counsel Fee and Alimony
Pendente Lite
Husband Plaintiff

ORDER

No. 22893 B.
(6)

Copy - copied

Filed 14 September 1923

Copy of the within Order of Court served on
Wm C. McCord, Solicitor on the 15th day of
September 1923 in presence of Harry B. Franz

Fees \$0.50

Thomas F. M^{ch}aulty
Sheriff

Harry Green

IN THE

CIRCUIT COURT No. 2

vs.

OF

Martha Green

BALTIMORE CITY

September, TERM, 1923

ORDERED BY THE COURT, this 14th day of September 1923

that the Plaintiff Harry Green

pay to the Defendant Martha Green

the sum of Twenty Dollars as Counsel Fee for the

Solicitor of the Defendant, and that he further pay the sum of Nine

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

Martha Green

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 29

day of September 1923, provided a copy of this Order be served on the said Plaintiff

Harry Green or his solicitor Wm E. McClard or before the 19th

day of September 1923

subscribed

\$ 25. per week

1 chkd.

TRUE COPY—TEST:

Clerk.