

In the Council  
of  
Baltimore City

Wm Harding 246

67 1921

Virginia Harding

Bill for James A. ...

Mr. Clerk please file

*(Signature)*

B 22 478

DAVIS & BISHOP

ATTORNEYS AT LAW

BANNER BUILDING

4 E. PENNSYLVANIA STREET

BALTIMORE, MD.

*sd 14 May 1921*

William Harding

In The Circuit Court

vs.

of

Virginia Harding

Baltimore City.

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To The Honorable, The Judge of Said Court:

Your orator complaining, respectfully says:

FIRST, that the parties hereto were married on or about November 18th. 1918 in Baltimore city, state of Maryland and lived together as man and wife until on or about December 22nd. 1920.

SECOND, That both parties are residents of the city of Baltimore, State of Maryland and have been for more than two years prior to the filing of this bill of complaint.

THIRD, That though the conduct the conduct of your orator toward his wife has always been kind, affectionate and above reproach, she without any just cause or reason deserted your orator ~~your-orator~~ to live in open adultery with lewd and abandoned men whose names are known to your orator. That the said defendant has declared her intentions to live no longer with your orator; that the said separation of the parties are beyond any reasonable hope or expectation of reconciliation.

FOURTH, That your orator has never condoned nor forgiven the said desertion and adultery, that he has never cohabited with the said respondent since the desertion and adultery.

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

THEREFORE YOUR ORATOR PRAYS:


a-a A divorce a vinculo matrimonii from the respondent.

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

May it please Your Honor to grant unto your  
Orator a writ of Subpoena, directed unto the said respondent,  
commanding her to be or appear in this Court on some day cer-  
tain to be named therein to perform such decree as may be pass-  
ed in the premises.

As in duty bound etc.

-----  
Complainant

  
-----  
Solicitor For Complainant.



72

246 p61  
1921

Ct. Ct.

Docket No.

Harding

Harding

932 Rutland Ave

SUBPOENA TO ANSWER BILL OF COMPLAINT

Per

No.

B 22478

2

Filed

23 May 1921  
J. S. Carr

SOLICITOR

6

Summoned and a copy of the process left with

the defendant

Thomas F. McNulty  
Sheriff

Fees \$0.80

(Frank)  
5/20/21

EQUITY SUBPOENA

The State of Maryland

To

Virginia Harding

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

William Harding

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 1921

Issued the 14th day of May, in the year 1921

CLAS 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.)

CIRCUIT COURT

19 21 Docket No. 246

1921  
Wm Harding

vs.

Virginia Harding

ORDER OF APPEARANCE

Mr. Clerk

Please File

James Kugel

Sol. for

B 22478

No.

3

Filed 13 day of June 19 21

246  
1921

Form 20

*Wm Harding*

IN THE  
**Circuit Court**  
OF  
BALTIMORE CITY

*Virginia Harding* vs.

*Term, 19*

Mr. WHITEFORD, Clerk.

*Enter my appearance for Defendant*

*James Fluegel*

Solicitor

~~*Virginia Harding*~~  
~~*Defendant*~~

FEDGER



246  
1921

In the  
Circuit Court  
of  
Baltimore City.

-----  
William Harding  
Vs  
Virginia Harding  
-----

Answer of Defendant  
to Bill of Complaint.

-----  
B 22 478  
Mr. Clerk

Please file.

*James Fluegel*  
Solicitor for Defendant.

fd 16 June 1921  
ATTORNEY AT LAW,  
EQUITABLE BLDG.,  
BALTIMORE, MD.



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William Harding                    ::           In the  
  ::           Circuit Court  
  ::           of  
Virginia Harding                    ::           Baltimore City.

To the Honorable, the Judge of said Court:

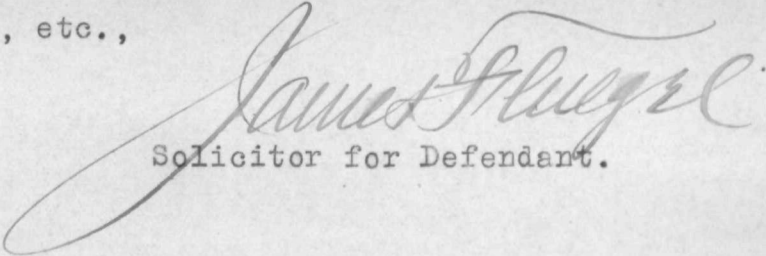
The Answer of Virginia Harding, the defendant in the above entitled cause, to the Bill of Complaint, respectfully represents unto Your Honor as follows:

1. That she admits the marriage of the parties hereto, their residence and that no children were born as the offspring of their marriage, as setforth in paragraphs one, two and five of the said Bill of Complaint.

2. That she denies any and all other allegations therein contained against her, and demands full and strict proof thereof.

Having answered the Bill of Complaint as fully as she is advised this defendant prays to be dismissed, with her costs.

And, as in duty bound, etc.,

  
Solicitor for Defendant.

Y

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3/12/14/35

246  
1921

In the  
Circuit Court  
of  
Baltimore City.

-----  
William Harding  
Vs  
Virginia Harding  
-----

Petition of Defendant  
for alimony pendente  
lite and counsel fee.

B 22478

Mr. Clerk:

57  
Please file.

*James Fluegel*  
Solicitor for Petitioner.

James Fluegel,  
Attorney at Law,  
55 E. Lexington St.,  
Baltimore, Md.  
fd 16 June 1921



William Harding            ::  
                                  Vs                            ::  
Virginia Harding            ::

In the  
Circuit Court  
of  
Baltimore City.

To the Honorable, the Judge of said Court:

The Petition of Virginia Harding, the defendant in this cause, respectfully represents unto Your Honor as follows:

1. That heretofore she was sued in this Honorable Court for a divorce a vinculo matrimonii by her husband, the plaintiff in this cause, on the ground of her alleged adultery.

2. That this defendant has answered the Bill of Complaint denying said charge, and has shown that the plaintiff is not entitled to the relief sought.

3. That Your Petition<sup>er</sup> has no means of her own for her maintenance and support, nor is she able to pay the costs of this proceeding, or her counsel his fee for the professional services to be rendered in defending her herein.

4. That the plaintiff is employed at Sparrows Point and earns about \$35.00 per week.

Wherefore Your Petitioner prays that Your Honor pass an order allowing her alimony pendente lite, as well as a reasonable sum as a counsel fee for her Solicitor of Record herein.

And, as in duty bound, etc.,

*James H. Stuegel*  
Solicitor for Petitioner.

*Virginia Harding*  
Petitioner.

STATE OF MARYLAND, Baltimore City, to wit:

Subscribed and sworn to this 15 day of June, 1921, by Virginia Harding, the Petitioner aforementioned.

As witness my hand and Notarial seal.

*Howard A. Sweeten*  
Notary Public.



Serve on  
Wm Harding,  
1723 Ashland Ave  
J. Steward Davis  
Solicitor for Wm Harding

B61 Docket 146  
1921  
**Circuit Court**

Wm Harding

vs.

Virginia Harding

**Order Counsel Fee and Alimony**

Pendente Lite

Jas Blugel  
No. \_\_\_\_\_

B 22478

(6) (7)

(8)

Ed 16 June 1921  
" 28 July 2  
" 13 July 3

Thomas F. McCall  
Sheriff

Non Est  
(McKinley)

2<sup>nd</sup> Return.

Copy of the within Order of Court served on  
J. Steward Davis, Solicitor, on the 30<sup>th</sup>  
day of June, 1921, in presence of Edward P. Wolf.

Ex 4050

Thomas F. McCall  
Sheriff

-IN THE-  
**CIRCUIT COURT**

-OF-  
**BALTIMORE CITY**

William Harding

vs.

Virginia Harding

May TERM 1921

ORDERED BY THE COURT this 16<sup>th</sup> day of June 19 21

that the Plaintiff William Harding

pay to the Defendant Virginia Harding

the sum of ~~Twenty~~ *Fifty* Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of *Fifteen*

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

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the *30*

day of June 1921; provided a copy of this Order be served on the said Plaintiff

William Harding on or before the *25*

day of June 19 21.

*Charles H. Hines*

TRUE COPY—TEST:

CLERK

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 13<sup>th</sup> day of July 1921, ordered by the Circuit Court of Baltimore City that the same be, and it is hereby made absolute and final.

James P. Forten



The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City

this 28<sup>th</sup> day of June 1921, that the time for showing cause

under said Order be extended to the 12 day of July 1921,

and the time for service of a copy of the same <sup>on the plaintiff's solicitor</sup> be extended to the 7 day of

July 1921.

*Charles H. Hester*