

57 B 1125  
IN THE  
CIRCUIT COURT OF P117  
BALTIMORE CITY.

RICHARD T. HARRIS

VS.

ANNIE E. HARRIS

*M. W. Harris*  
Balls Co.

BILL OF COMPLAINT

Mr. Clerk:-

Please file and  
issue.

*Linwood L. Clark*  
Atty. for Complainant.

B 16350  
<1>

At 15 March 1917

RICHARD T. HARRIS	:	IN THE
	:	
VS.	:	CIRCUIT COURT OF
	:	
ANNIE E. HARRIS	:	BALTIMORE CITY.

: : : : : : : :

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

Your Orator, complaining, respectfully shows unto your Honor:

1st. That on or about the \_\_\_\_\_ day of May, 1902, your Orator was married to the Defendant, Annie E. Harris, in the First Baptist Church, Colored, Caroline Street near Jefferson Street, Baltimore City, by the Reverend Mr. Allen. (The Certificate being in the possession of the Defendant).

2nd. That the Defendant frequently cursed and threatened your Orator, all of which he endured until she threatened to take his life while asleep, after which time he was afraid to occupy the same room with her at night.

3rd. That your Orator lived with the Defendant until the 30th day of March, 1914, at which time the Defendant abandoned your Orator and threatened his life.

4th. That there have been no children as the result of said marriage.

5th. That your Orator at the time of said abandonment lived at Mt. Winans, Baltimore County, and since then has been living at 1007 Pennsylvania Avenue, Baltimore City; that both the Plaintiff and Defendant have been residents of the State of Maryland for the past two years prior to the filing of this Bill of Complaint; in fact all their lives.

6th. That notwithstanding said abandonment, as aforesaid, he has continued to pay his wife for her support such sums from time to time as he has been able to do.

7th. That your Orator did everything possible and reasonable to satisfy and comply with the wishes of his wife, and has conducted himself as a faithful and affectionate husband, and that his entire conduct has been without reproach.

8th. That said separation has continued uninterruptedly for a period of three years, and is deliberate and final, and is without any hope of reconciliation.

WHEREFORE your Orator prays that he may be divorced from the said Annie E. Harris.

*a vinculo Matrimonii*

And for 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 Defendant, at Mt. Winans, Baltimore County, State of Maryland, commanding her to be and appear in this Honorable Court, on some certain day to be named therein, to show cause, if any she may have, why the relief asked for should not be granted as prayed.

  
Attorney for Complainant.

*Sumner and Co left with her.  
Sumner & Noble Sheriff*

112  
1917 No. 57

Ct. Cl.  
Docket.

Richard T. Harris  
vs

Annie E. Harris

**Subpoena to Answer Bill of Complaint**

*B*  
No.

16350

(2)

Received *Mar 16* 1917, at  
8<sup>30</sup> - 9 A.M. forthwith delivered to  
Sheriff of Baltimore County  
William P. Cole, Clerk

Filed *9 April* 1917  
*Sumner & Noble*  
Solicitor

EQUITY SUBPOENA

The State of Maryland

To Anne E Harris  
Int Kinans  
(Balto Co)

Of Baltimore County, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said city, on the Second Monday of April 1917 to answer the complaint of

Richard J. Harris

against you in said Court exhibited.

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 12<sup>th</sup> day of March 1917

Issued the 15<sup>th</sup> day of March in the year 1917

Clas R Whiteford  
Clerk

*B 112*  
*1917*  
IN THE  
CIRCUIT COURT  
OF BALTIMORE CITY.

RICHARD T. HARRIS

VS

ANNIE E. HARRIS

ANSWER

Mr. Clerk:  
Please file.

*Hawkins & McMechen*  
.....  
Solicitors for Defendant.

*B 16350*  
*(3)*

HAWKINS & MCMECHEN  
ATTORNEYS AT LAW  
21 E. SARATOGA STREET  
BALTIMORE, MD.

FILED *11 April 1917*

RICHARD T. HARRIS	:	IN THE
	:	
	:	
VS	:	CIRCUIT COURT
	:	
	:	
ANNIE A. HARRIS	:	OF BALTIMORE CITY.

::::::::::::::::::::

TO THE HONORABLE THE JUDGE OF SAID COURT:

The ANSWER of ANNIE E. HARRIS, the respondent, to the BILL of COMPLAINT in this Honorable Court exhibited against her, respectfully represents:

FIRST: That your respondent admits her marriage with the complainant, at and about the time set out in said Bill of Complaint, but she avers that it took place at her residence in Baltimore City, and not at the First Baptist Church as alleged.

SECOND: That your respondent denies every and all of the facts concerning the charges of cruelty set out in paragraph No.2 of said Bill of Complaint, and she avers that the only approach to such conduct on her part was when she denied the right of the Complainant to chastise her physically, or when she would protect herself from his assaults.

THIRD: That your respondent denies any abandonment by her of her said husband on March 30th, 1914, or at any other time, but she alleges that the final separation between them occurred in the month of June 1914, and that at that time the complainant abandoned and deserted your respondent leaving her not so much as the ordinary necessities of life in their home.

FOURTH: That she admits paragraph No.4 of said Bill of Complaint regarding the birth of children

FIFTH: That your respondent admits as alleged in paragraph No.5 of said Bill of Complaint that at the time of the separation between them that they levied at Mt. Winans, Baltimore County, the residence of the parties in Maryland, and the present residence of the complainant.

SIXTH: That your respondent denies the allegations in paragraph No.6 of said Bill of Complaint regarding the support given her by the complainant and she alleges quite to the contrary that except for small sums of FIVE DOLLARS (\$5.00) paid her at intervals of three (3) and four (4) months, the complainant has done nothing for her support and maintenance since their separation.

SEVENTH: That your respondent denies completely and fully every allegation in paragraph No.7 of said Bill of Complaint, and in further explanation of her denial says that her husband did everything possible during their life together, following a brief period after their marriage, to show his aversion for her, to humiliate her at home and abroad, and to provide as little as possible for her support, his object being to drive her from their home, and when he found this impracticable, he left himself.

EIGHTH: That she denies that the separation between them has continued uninterruptedly for three years, or that it is deliberate and final, or beyond any hope of reconciliation, except as it is the wish and desire of the complainant.



Having answered said Bill of Complaint as fully as she is advised is necessary, your respondent prays that she may be hence dismissed with her costs.

AND AS in duty bound, etc.

Test:-

J. Winfield Thomas  
Ida Henry

Amie A. X. Harris  
maul

Hawkins & McMechen  
Solicitors for Defendant.

B 112  
IN THE 1917  
CIRCUIT COURT  
OF BALTIMORE CITY.

RICHARD T. HARRIS

VS

ANNIE E. HARRIS

P E T I T I O N .

Mr. Clerk:-  
Please file.

*Hawkins & McMechen*  
Solicitors for Petitioner.

B 16350  
(4)

HAWKINS & MCMECHEN  
ATTORNEYS AT LAW  
21 E. SARATOGA STREET  
BALTIMORE, MD.

FILED *11 April 1917*

<p>RICHARD T. HARRIS</p> <p style="text-align: center;">VS</p> <p>ANNIE <i>A.</i> HARRIS.</p>	<p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p> <p>:</p>	<p>IN THE</p> <p>CIRCUIT COURT</p> <p>OF</p> <p>BALTIMORE CITY.</p>
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: : : : : : : : : : : :

TO THE HONORABLE THE JUDGE OF SAID COURT:

Your petitioner, complaining, says:

1. That the plaintiff has filed his Bill in this Court for a divorce a vinculo matrimonii from your petitioner on the grounds of desertion and abandonment, as will appear by reference to said Bill of Complaint.
  
2. That your petitioner altogether denies said charge, and affirms that when said cause comes on to be heard, it will be seen by the Court that the said charge is entirely destitute of foundation.
  
3. That while denying that she has deserted or abandoned her husband as alleged in his said Bill of Complaint, your petitioner admits it to be true that said plaintiff has not for more than two (2) years lived with her, although she has always been and is now willing and anxious for him to do so.
  
4. That your petitioner is advised that she is entitled to have an order passed by this Honorable Court requiring the plaintiff to pay her a reasonable and proper sum for alimony pendente lite for her personal support, and also a reasonable and proper sum to enable her to defray the necessary

expenses for her defense to said Bill and to compensate counsel whom she has retained to defend the said suit.

5. That the plaintiff is a pensioner receiving your petitioner is advised a sum not less than SIXTEEN DOLLARS (\$16.) per month from the United States Government, and in addition is engaged in the transfer business with his own teams from which he makes TWENTY DOLLARS (\$20.) and TWENTY-FIVE DOLLARS (\$25.00) per week clear of expenses, while your petitioner is without means of support, except from her own labor and the charity of her friends.

6. That in view of the circumstances set forth in the above paragraph, your petitioner is advised that she is entitled to a liberal allowance to be made for her defense, and the amount of her alimony pendente lite should also be fixed according to the plaintiff's means and ability.

YOUR PETITIONER, THEREFORE, PRAYS your Honor to pass an order requiring the said Richard T. Harris to pay her alimony pendente lite such a sum and at such intervals, as to the Court shall seem proper; and also such other sum, as to the Court shall seem proper, to enable your petitioner to defray the expenses to which she will be put in defending said suit, including a reasonable fee to her counsel.

AND as in duty bound, etc.

Hartree & McEachern  
Solicitors for Petitioner.

STATE OF MARYLAND, BALTIMORE CITY, to wit:

I HEREBY CERTIFY, that on this 7<sup>th</sup> day of April, Nineteen hundred and seventeen, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared ANNIE A. HARRIS, and made oath in due form of law that the matters and facts in the foregoing petition, are true to the best of her knowledge and belief.

WITNESS my hand and Notarial Seal.

*Notary: J. Winfield Thomas*

*Attest: Henry  
Annie A. Harris*

*J. Winfield Thomas*  
Notary Public.

57 B Docket 112  
1917

CIRCUIT COURT.

Richard T. Harris  
1007 Penna Ave  
vs.

Annie S. Harris

Order For Alimony

Pendente Lite.

ORDER

B No. 6  
( ) 50

Fd.: 11 April 1917  
Hankins + Mc Mahony  
SP 2766

Copy of the within Order of Court served on Richard  
S. Harris on the 17th day of April 1917. in presence of  
John B Kelly.

Thomas F. McNulty  
Sheriff

Fees \$0-50.

Richard T. Harris

vs.

Annie E. Harris

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

March TERM, 1917

ORDERED BY THE COURT this 11<sup>th</sup> day of April 1917

that the ~~defendant~~ plaintiff, Richard T. Harris  
pay to the ~~plaintiff~~ defendant, Annie E. Harris  
the sum of Seven

Dollars per week, during the continuance of this suit, accounting from the 11<sup>th</sup>  
day of April 1917 to the said ~~plaintiff~~ defendant  
as Alimony, *pendente lite* unless cause to the contrary be shown on or before the 26  
day of April 1917, provided a copy of this Order be served on the said ~~defendant~~  
~~plaintiff~~ on or before the 19  
day of April 1917

H. Arthur Stump

TRUE COPY—TEST:

CLERK.

IN THE *B112*  
CIRCUIT COURT OF  
BALTIMORE CITY. *1917*

RICHARD T. HARRIS

VS.

ANNIE E. HARRIS.

ANSWER

Mr. Clerk:-

Please file, &c.,

*Lawrence L. Clerk*  
Attorney for Plaintiff.

*B16 350*

*(6)*

*Ad 25 April 1917*



RICHARD T. HARRIS	:	IN THE
	:	
VS.	:	CIRCUIT COURT OF
	:	
ANNIE E. HARRIS	:	BALTIMORE CITY.

: : : : : : : : :

The Plaintiff, by Linwood L. Clark, his Attorney, answering the petition of the Defendant for alimony pendente lite, and showing cause why Seven Dollars per week alimony pendente lite should not be paid to the Defendant, as provided in the Nisi Order of this Honorable Court on the Eleventh day of April, 1917, respectfully says:

First: That the Plaintiff has been paying to the Defendant all he could afford to pay since she deserted him, and that the Defendant has been accepting same without complaint.

Second: That the income of the Plaintiff is only from about Five to Eight Dollars a week at his business as a drayman, and about Fifty Dollars every three months as a pension.

Third: That after the Plaintiff makes the most meagre provision for himself, both as to clothes and food, and also shelter, and makes reasonable provision for his horse and wagon, he has nothing left; that as a matter of fact he is now three months in arrears in his rent for his rooms and stable amounting to about Forty-five Dollars.

Fourth: That it is impossible for the Plaintiff to pay alimony pendente lite; that he had to borrow money to pay the costs of this case.

Fifth: That the Defendant is not in need of support, or of alimony pendente lite, and is more comfortably fixed and provided for in every respect than the Plaintiff.

Sixth: Having answered the petition of the Defendant for alimony, and having shown the impossibility of paying the Defendant alimony pendente lite, your Plaintiff respectfully moves that said petition be dismissed.

  
 Attorney for Plaintiff.

Sewson  
Linwood R Clark  
Solo

112- B Ct. Ct.  
1917 No. 57 Docket.

Harris

vs.

Harris

**NOTICE FOR HEARING.**

B. No. 16350  
(7)

No.  
Filed 28 day of April 1917

9

Copy of the within notice served on Linwood Le  
Clark Solicitor on the 1st day of May 1917 in presence  
of John B. Kelly,  
Thomas F. McMullin  
Sheriff  
Fees \$0-50

Richard J. Harris

vs

Annie E. Harris

IN THE  
**CIRCUIT COURT**  
OF BALTIMORE CITY

Upon application made by the Solicitor for the *Defendant*.....

*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 & Counsel fee*

*when reached in due course on the said calendar.*

CHARLES R. WHITEFORD,

*Clerk Circuit Court.*

Lumwood L Clark

112  
1917 Ct. Ct.  
No. 57 B Docket.

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Richard T. Harris

VS.

Annie E. Harris

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**MOTION FOR HEARING**

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B  
No. 16350

8

Filed 28 day of April 1917

Hartman + M. Medler

*Richard T. Harris*

VS.

*Annie E. Harris*

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY

The *defendant* by *Hawkins & McMechen*

*her*

Solicitors applies to have the above entitled cause placed on the Trial

Calendar for hearing *on the question of alimony covered*

*fee*

in conformity with the First Equity Rule.

*Hawkins & McMechen*

Solicitors for

*defendant.*

Circuit Court 57 B.  $\frac{112}{1917}$

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Richard T. Harris

vs.

Annie E. Harris

---

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Final Order, Counsel Fee and Alimony

*Pendente Lite*

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No. 16350 B  
197

Filed 19 June 1917

Richard T. Harris  
vs.

Annie E. Harris

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY.

May

Term, 1917

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 19<sup>th</sup> day of June 1917, that the Plaintiff, Richard T. Harris pay to the defendant Annie E. Harris the sum of \_\_\_\_\_ Dollars, as counsel fee for the Solicitor of the \_\_\_\_\_ and that he further pay the sum of Two Dollars per week, to the said Annie E. Harris as Alimony *pendente lite* accounting from the 21<sup>st</sup> day of May 1917 and continuing until the \_\_\_\_\_ day of 1917 (should this suit be so long pending) or until the further order of this Court

H Arthur Stump -

Serve on

Linwood L. Clark  
Solicitor

112 Saratoga St.

908 Angyle ave

Ct. Ct.

57 B 112  
1917

Richard T. Harris

vs.

Annie S. Harris

ORDER OF COURT

B 16350

No. B.

(10) (11)  
(12)

Filed 10 Sept 1917

21 43  
3 Oct

Thomas F. McVultry  
Sheriff  
Thomas F. McVultry  
Sheriff

Am Ed  
(Kelly)  
2nd Return  
Am Ed  
(Kelly)  
3 (R. D. Return)

Copy of the Within Order of Court served on Richard T. Harris  
on the 5<sup>th</sup> day of October 1917 in presence of Charles A. Baman  
Thomas F. McVultry  
Sheriff

Fees \$0.50



Richard T. Harris

vs.

Annie E. Harris

IN THE  
CIRCUIT COURT

OF  
BALTIMORE CITY.

Ordered by the Circuit Court of Baltimore City this ~~10~~ day of ~~Sept~~ 1917

that the ~~plaintiff~~ *Richard T. Harris* appear before this Court in person, on the *17* day of *September*, 1917, 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 *19th* day of *June*, 1917, directing the payment of Alimony, pendente lite, by him to the ~~defendant~~ *Annie E. Harris* provided a copy of this Order be served on the said ~~plaintiff~~ *at his solicitor* on or before the *14* day of *September*, 1917.

H. Arthur Stump

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 *3* day of *October* 1917, that the time for showing cause under said Order be extended to the *8* day of *October* 1917, and the time for service of a copy of the same be extended to the *6* day of *October* 1917.

H. Arthur Stump

Richard T. Harris

IN THE

CIRCUIT COURT

vs.

OF

Annie E. Harris

BALTIMORE CITY.

Ordered by the Circuit Court of Baltimore City this 10 day of Sept 1917

that the ~~plaintiff~~ Richard T. Harris appear before this Court in person, on the 17 day of September, 1917, 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 19<sup>th</sup> day of June, 1917, directing the payment of Alimony, pendente lite, by him to the ~~defendant~~ Annie E. Harris provided a copy of this Order be served on the said ~~plaintiff~~ or his solicitor on or before the 14 day of September, 1917.

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 21 day of Sept 1917, that the time for showing cause under said Order be extended to the 1<sup>st</sup> day of October 1917, and the time for service of a copy of the same be extended to the 28 day of Sept 1917.

H. Arthur Stump.

Serve on

Richard J. Harris  
Friendship, Howard Co.,  
Md., care Harry Harris

Ct. Ct.

57 B 772  
1917

Richard J. Harris

vs.

Annie S. Harris

ORDER OF COURT

Within "Order of Court" served  
on, & Copy of same left  
with Richard J. Harris  
June 10/18 350  
No. of Sher. Return  
B. 16350  
{ 13 }

Received 7<sup>th</sup> June 1918  
and forthwith delivered to the Sheriff  
of Howard County.  
Hart B. Nell, Clerk.

Filed 6 June 1918

Richard T. Harris

vs.

Annie S. Harris

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this 6<sup>th</sup> day of June 1918  
 that the plaintiff Richard T. Harris appear before this Court in person,  
 on the 17 day of June, 1918, 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 19<sup>th</sup> day of June, 1917, directing the  
 payment of Alimony, pendente lite, by him to the defendant Annie S. Harris  
 provided a copy of this Order be served on the said Plaintiff  
 on or before the 14 day of June, 1918

Jacques M. Reubler

Serve on

Richard T. Harris.....

908 Argyll avz.....

Ct. Ct.

57B 112  
1917

Richard T. Harris.....

vs.

Annie E. Harris.....

ORDER OF COURT

B 16 350  
No. .... B. (14)

Filed 3<sup>rd</sup> August 1917

Copy of the within Order of Court served on Richard T. Harris on the 4<sup>th</sup> day of August 1920 in presence of John B. Kelly. Thomas F. McSherry Sheriff  
Fees \$ 0.50

Richard T. Harris

vs

Annie S. Harris

IN THE  
CIRCUIT COURT

OF  
BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this ...3<sup>rd</sup>... day of ...August... 1920  
that the plaintiff Richard T. Harris appear before this Court in person,  
on the 3<sup>rd</sup> day of August, 1920 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 ...19<sup>th</sup>... day of June ... 1917, directing the  
payment of Alimony, pendente lite, by him to the defendant, Annie S. Harris  
provided a copy of this Order be served on the said Richard T. Harris  
on or before the 17<sup>th</sup> day of August, 1920

*Charles H. Haines*

Ordered this 13<sup>th</sup> day of August, 1920, that the foregoing order be and  
is rescinded with out prejudice to rights of either party  
James M. Cumber

112  
19

Ct. Ct.

19

Docket

Harms

vs.

Harris

**SUMMONS FOR WITNESSES**

B 16350

No.

(15)

Filed 10 day of Aug 19 70

In the Circuit Court of Baltimore City

\_\_\_\_\_ Term, 19

The Sheriff will please summon the following witnesses,

returnable Aug 13 - 1920 at 10 A. M.

[Lined area for listing witnesses]

to testify for Defendant  
in the case of Harris

vs. Harris

Clark Whitford  
CLERK OF CIRCUIT COURT OF BALTIMORE CITY



# CIRCUIT COURT

19 <sup>11/2</sup> 17 Docket No. 57B

RICHARD T. HARRIS

vs.

ANNIE E. HARRIS.

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## ORDER OF APPEARANCE

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---

Mr. Clerk

Please File

Sol. for

B 16350  
No. 16

Filed 13 day of July 19 21

ANNIE E. HARRIS  
I. EDGEPAR  
MILL

RICHARD T. HARRIS

vs.

ANNIE E. HARRIS.

IN THE  
**Circuit Court**  
OF  
BALTIMORE CITY

Term, 19

Mr. WHITEFORD, Clerk.

Enter my appearance for ~~Defendant~~ Plaintiff

*[Handwritten signature]*  
*[Handwritten signature]*  
Solicitor  
for Plaintiff.

IN THE CIRCUIT COURT

NO. 1  
BALTIMORE CITY.

*B 112*  
*1917*

Richard T. Harris

vs.

Annie E. Harris.

-POWER OF ATTORNEYS.-

*B 16350*

Mr. Clerk:--

*17*

Please file &c.,

*Roy S. Bond*

ROY S. BOND  
ATTORNEY AT LAW  
215 ST. PAUL PLACE  
BALTIMORE, MD.

FILED

*13 July 1921*

RICHARD T. HARRIS

vs

ANNIE E. HARRIS

\*  
\*  
\*  
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\*  
\*  
\*

IN THE  
CIRCUIT COURT ~~No. 2~~  
OF  
BALTIMORE CITY

oooo00000oooo

Mr. Clerk:

Please issue subpoenas for the following witnesses for defendant, and make same returnable before Judge Ambler, Friday August 13th 1920, 10 o'clock, A. M.:--

<sup>sd</sup>  
10 Richard T. Harris, 908 Argyle Ave.

<sup>sp</sup>  
11 Ida V. Henry, 1512 McCulloh Street.

Staubrich & McMechen  
Solicitors for Defendant.

KNOW ALL MEN BY THESE PRESENTS, that I, Richard T. Harris, of the City of Baltimore, State of Maryland, do constitute and appoint J. Stewart Davis and Roy S. Bond, as my true and Lawful Attorneys in the matter of the divorce case of Richard T. Harris versus Annie E. Harris, hereby granting unto my Attorneys all power to act in every compacity for me in the same and hereby discharging all others and declaring the said J. Stewart Davis and Roy S. Bond, my only true and lawful Attorneys.

IN WITNESS WHEREOF, I set my hand and Seal this 12<sup>th</sup>  
day of July 1921.

Richard T. Harris

Richard T. Harris

vs

Annie E. Harris.

)  
)  
)  
)  
)

In The  
Circuit Court of  
Baltimore City.

Mr. Clerk:

Please issue summons for the following witnesses for the defendant and make the same returnable Wednesday, March 8, 1922.

*SP*  
Rebecca Jackson,

*SP*  
Chatman Jackson, ~~and~~

*SP*  
15 Matilda Murdock. *all at*

Mt. Winans,

Baltimore City.

*Harris v M Mechem*

Solicitors for Defendant.

Serve on

Circuit Court No. 2

1917 <sup>112</sup> <sup>701.</sup> Docket No. <sup>578</sup>

RICHARD T. HARRIS

vs.

ANNIE E. HARRIS.

PETITION AND ORDER TO TAKE TESTIMONY UNDER 35TH RULE.

B 16350

No. \_\_\_\_\_

18

Filed

13 July

1917

3

Linwood L. Clarke  
Roy S. Bond  
J. Steward Davis

Serve on

Linwood L. Clarke n. e.

J. Steward Davis 7/20/21

Hawkins & McMechen 7/20/21

Hawkins +  
McMechen

*Copy of the within Petition and Order of Court served on Hawkins and McMechen Solicitors, by service on St. Ashbie Hawkins Solicitor, Also Copy of the within Petition and Order of Court served on J. Steward Davis, Solicitor, on the 20th day of July 1921. in the presence of Morris Finckelstein. Now Ent as to Linwood L. Clarke.*

Fee \$1.00

Thomas J. McNeilly  
Sheriff

RICHARD T. HARRIS

vs.

ANNIE E. HARRIS.

IN THE  
Circuit Court No. *1*  
OR  
BALTIMORE CITY.

To the Honorable, the Judge of the  
Circuit Court ~~No. 2~~ of Baltimore City:

The Plaintiff in this case respectfully shows unto your Honor

That he desires to examine orally, in open Court and in the presence of your Honor, certain witnesses who can testify to the facts and matters relevant to the allegations in the Bill of Complaint filed in this case.

Your Petitioner therefore prays your Honor to pass an order, according to the Statutes for such cases made and provided

And as in duty bound will ever pray.

*Roy Bond*  
Solicitor for Plaintiff.

Upon the foregoing Petition and Application it is this *13* day of *July*  
A. D. 19*12* / , Ordered that the Petitioner have leave to take testimony as prayed and that the testi-  
mony to be offered be taken as required by the 35th Rule of this Court. And it is further Ordered that  
a copy of this Petition and Order be served on the *Defendant*  
or her Solicitor, on or before the *23* day of *July*, 19*12*,  
*James P. Gorter*



# CIRCUIT COURT

B-112  
1917

*Docket No.*

---

Harris  
*vs.*

Harris

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PETITION AND ORDER TO  
TAKE TESTIMONY UN- .  
DER 35th RULE

No. B 16 350

RICHARD T. HARRIS

vs.

ANNIE HARRIS

IN THE  
Circuit Court  
OF  
BALTIMORE CITY

To the Honorable the Judge of the  
Circuit Court of Baltimore City:

The plaintiff in this case respectfully shows unto your Honor:

THAT he desires to examine orally, in open Court and in the presence of your Honor, certain witnesses who can testify to the facts and matters relevant to the allegations in the Bill of Complaint filed in this case.

Your petitioner therefore prays your Honor to pass an order, according to the Statutes for such case made and provided.

And as in duty bound will ever pray.

Roy S. Bond

Solicitor for Plaintiff.

Upon the foregoing Petition and Application it is this 13<sup>th</sup> day of July  
A. D., 1921, Ordered that the petitioner have leave to take testimony as prayed and that the testimony to be offered be taken as required by the 35th Rule of this Court. And it is further Ordered that a copy of this petition and order be served on the Defendant or her Solicitor, on or before the 23<sup>rd</sup> day of July 1921

James P. Gorter

TRUE COPY

TEST

Chas R. Whiteford  
CLERK.

# CIRCUIT COURT

19

Docket No. B 112  
1917

Richard J Harris

*vs.*

Annie E Harris

---

*Struck out*  
ORDER ~~OF~~ APPEARANCE ✓

---

Mr. Clerk

Please File

Lewis S. Crane  
*Sol. for ref*

B  
No. 16650  
19

Filed 2 day of March 1917

B 112-1917

Richard J Harris

vs.

Annie E Harris

IN THE  
**Circuit Court**  
OF  
BALTIMORE CITY

Term, 19

Mr. WHITEFORD, Clerk.

please ~~strike out~~ Enter my appearance for ~~Defendant~~ *Plf*

*Leonard L. Blair*  
Solicitor

668  
1917

112  
17

Ct. Ct.

Docket 57

Harris

vs.

Harris

**SUMMONS FOR WITNESSES**

B No. 16350

20

Filed

day of

March 19 22

*In the Circuit Court of Baltimore City*

\_\_\_\_\_ Term, 19

The Sheriff will please summon the following witnesses,

returnable March 8 - 1922 at 10 A. M.

Multiple horizontal lines for listing witnesses.

to testify for Defendant  
in the case of Harris

vs. Harris

Clark Whiteford

112  
17 In The Circuit Court of Baltimore City. 1917

Richard T. Harris  
vs  
Annie Harris.

908 Argyle

Order of Court.

Mr. Clerk:  
Please file.

*Hawkins & McMechen*  
Solicitors for Defendant.

B 16350  
21

HAWKINS & McMECHEN  
ATTORNEYS-AT-LAW  
14 PLEASANT STREET  
BALTIMORE, MD.

FILED 20 March 1922

The Daily Record Co. Print, Baltimore, Md.

10

Copy of the within Order of Court served on Richard  
T. Harris on the 22nd day of March 1922 in presence  
of John A. Kelly  
Thomas A. McCarty  
Schwartz  
\$ 0.50

Richard T. Harris	)	In The
vs	)	Circuit Court
Annie Harris	)	of
	)	Baltimore City.
	)	

It appearing to the Court that on the 19th day of June, 1917, his Honor Judge Stump passed a final order in this cause allowing the defendant, Annie Harris, Two dollars. (\$2.00) per week, alimony pendente lite; that at a hearing had before Judge Ambler on the 13th day of August, 1920 of an order passed by Judge Heuisler on the 3rd day of August, 1920, requiring the said Harris to show cause why he should not be punished for contempt, the order to show cause as aforesaid, was rescinded, without prejudice to the rights of either; that the said Harris has not obeyed in any way the final order passed as aforesaid, on the 19th day of June, 1917, it is thereupon

Ordered by the Circuit Court of Baltimore City this 20 day of March, 1922, that the plaintiff, Richard T. Harris, appear before this Court in person, on the 27 day of March, 1922, at ~~20~~<sup>30</sup> o'clock P. 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 19th day of June, 1917, directing the payment of Alimony pendente lite by him to the defendant, Annie Harris, provided a copy of this Order be served on the said Richard T. Harris, or his solicitors of Record, on or before the 25 day of March, 1922.

*Charles E. Stump*



Serve on

Richard J. Harris  
90 1/2 Little  
Cune St.

Ct. Ct.

57 B. 142  
1927

Richard J. Harris

vs.

Annie E. Harris

ORDER OF COURT

B No. 163.50 B.

122

Filed 25<sup>th</sup> Sept 1927

10

Copy of the within Order of Court served on Richard  
J. Harris on the 27<sup>th</sup> day of September 1922 in  
presence of John B. Kelly.  
Thomas F. McCullough  
Sheriff  
Fee \$0.50

Richard T. Harris

vs.

Cornie E. Harris

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this 25<sup>th</sup> day of September 1922 that the plaintiff Richard T. Harris appear before this Court in person, on the 2 day of October, 1922, 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 19<sup>th</sup> day of January, 1917, directing the payment of Alimony, pendente lite, by him to the defendant Annie F. Harris provided a copy of this Order be served on the said Plaintiff on or before the 29 day of Sept, 1922

Carroll J. Bond

Plaintiff has not paid a single cent since the passage of the Order.

W. Annie Harris

668 Circuit Court

19..17.. 137

Docket No.....

Karrs

vs.

Karrs

COMMITMENT

B 16350  
(23)

Fd. 2 October, 1922

1922, Oct 2, Dismissed per Order of Court

Thomas J. W. Anely  
Sheriff

\$ 2.00 Sheriff  
1.00 clerk  
3.00 Pd Oct 22/1922

Richard J Harris

vs.

Annie E Harris

IN THE

Circuit Court

OF

BALTIMORE CITY.

The ~~Defendant~~ Plaintiff *Richard J Harris*, having been brought before the Court

under the writ of attachment heretofore issued against him, as for a contempt, for his non-compliance with the order of this Court passed Conditionally on the *11* day of *April*,

19*17*, and made final on the *19* day of *June*, 19*17*, and

being still in contempt for his non-compliance therewith, the Court being satisfied from the proof in the cause that he is able to comply with the said order; it is this *2* day of *October*,

19*22*, ORDERED, by the authority of the Circuit Court of Baltimore City, that the said *Richard J Harris* pay the Costs of the attachment and stand committed to the custody of the

Warden of the Jail of Baltimore City until he shall have purged the contempt by his compliance with the said order, and that the Sheriff of Baltimore City deliver the body of the said *Richard J*

*Harris* to the said Warden, together with a copy of this order to be furnished by the Clerk of this Court.

*Carroll J Bond*

*Dismissed upon payment of costs and upon age payment of arrears as recited in order filed in case.*

*October 2, 1922*

*Carroll J Bond*

# Circuit Court

19.....

Docket No.....

.....  
vs.  
.....

## COMMITMENT

Ed....., 19.....

Richard J. Harris  
vs.  
Anne E. Harris

IN THE  
**Circuit Court**  
OF  
BALTIMORE CITY.

*Plaintiff* Richard J. Harris  
The ~~Defendant~~, having been brought before the Court

under the writ of attachment heretofore issued against him, as for a contempt, for his non-compliance with the order of this Court passed Conditionally on the 11 day of April, 1917, and made final on the 2 day of October, 1917, and

being still in contempt for his non-compliance therewith, the Court being satisfied from the proof in the cause that he is able to comply with the said order; it is this 2 day of October

1917, ORDERED, by the authority of the Circuit Court of Baltimore City, that the said Richard J. Harris pay the Costs of the attachment and stand committed to the custody of the

Warden of the Jail of Baltimore City until he shall have purged the contempt by his compliance with the said order, and that the Sheriff of Baltimore City deliver the body of the said Richard J.

Harris to the said Warden, together with a copy of this order to be furnished by the Clerk of this Court.

Carroll F. Bond

TRUE COPY  
TEST  
Chas R. Whiteford  
CLERK

57B.

112668  
1917

In the  
Circuit Court  
of  
Baltimore City.

---

Richard T. Harris

<sup>40</sup>  
Annie L. Harris

---

Order of Court

---

Mr. Clerk:

Please file  
W. Annie Harris  
Sol. for Div. d.  
B. 16350  
fd. 4" October 1922

Richard T. Harris

In the

vs  
Annie E. Harris

Circuit Court  
Baltimore City,

The parties to this cause having agreed between to give and to accept One hundred fifty dollars (\$150) in full settlement of all alimony in arrears, the said payment to be made not later than Wednesday Oct. 4<sup>th</sup> 1922, it is Ordered by the Court this 2<sup>nd</sup> day of October 1922 that the consent of the Court is given to this agreement upon payment of the money, that the proceedings for contempt are dismissed upon payment of costs, and that all previous orders in this cause are not to be affected hereby,

Carroll J. Bond



Serve on

Ct. Ct.

57 B 112  
1924

902 Little Pine Street

Annie Harris

VS.

Richard T. Harris

902 Little Pine St

ORDER OF COURT

D 16357

No. B.

1257

Filed 4<sup>th</sup> March 1924  
10

Copy of the within Order of Court Served on Richard T. Harris. on the 10<sup>th</sup> Day of March 1924 in Presence of -  
August J. Bichy (Gas \$ 0.50)  
John C. Potee Sheriff

*Annie Harris*

vs.

*Richard T. Harris*

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this *4* day of *March* 192*4*,  
that the *Defendant* appear before this Court in person,  
on the *14* day of *February*, 192*4*, at *one o'clock PM* ~~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 *2nd* day of *October* 192*2*, directing the  
payment of Alimony, pendente lite, by him to the *plaintiff*  
provided a copy of this Order be served on the said *Defendant*  
on or before the *15th* day of *March* 192*4*.

*Charles F. Stein*

*Arrears to March 3, 1924 -  
\$112.00*

Serve on

Richard T. Harris,

902 Little Pine St.

Ct. Ct.

57 B 112  
1927

Annie Harris,

VS.

Richard T. Harris.

902 Little Pine

ORDER OF COURT

B 16350

No. B.

{26}

Filed 11 April 1927  
10

Copy of the within of Order of Court served  
on Richard T. Harris. on the 17th day of April 1927  
in Presence of August J. Bichy  
John C. Potee  
Sherry  
(Fee \$0.50)

BOND  
HOWARD

Annie Harris

vs.

Richard T. Harris

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this 11 day of April 1924

that the Defendant appear before this Court in person,  
on the ~~11~~ 21 day of April, 1924, 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 2nd day of October, 1922, directing the  
payment of Alimony, pendente lite, by him to the Plaintiff  
provided a copy of this Order be served on the said Defendant  
on or before the 12 day of April 1924.

Arrears including April 7th - \$52.00

*Real Elliott* *Charles F. ...*

Serve on

Ct. Ct.

57 B 112  
1927

Harris

VS.

Harris

ORDER OF COURT

B-16350

No. 27 B.

Filed 28<sup>th</sup> June 1927  
10

Annie Harris  
vs.  
Richard J. Harris

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this ~~28~~<sup>17</sup> day of ~~June~~<sup>July</sup> 192~~4~~<sup>X</sup>  
that the ~~Defendant~~<sup>Defendant</sup> appear before this Court in person,  
on the ~~17th~~<sup>17th</sup> day of ~~June~~<sup>July</sup> 192~~4~~<sup>X</sup>, 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 ~~2nd~~<sup>2nd</sup> day of ~~October~~<sup>October</sup>, 192~~2~~<sup>2</sup> directing the  
payment of Alimony, pendente lite, by him to the ~~Plaintiff~~<sup>Plaintiff</sup>  
provided a copy of this Order be served on the said ~~Defendant~~<sup>Defendant</sup>  
on or before the ~~17th~~<sup>17th</sup> day of ~~June~~<sup>July</sup> 192~~4~~<sup>X</sup>.

Charles F. Stein

Arrears to and including June 16/1924 \$30.00,  
Beal Elliott, Probation Officer

Ine Copy Test  
Clerk R. Waldford  
CR

Serve on

Ct. Ct.

B

192

Richard T. Harris

902 Little Pine St.,

Annie Harris

VS.

Richard T. Harris.

ORDER OF COURT

No. B.

Filed 192

10

*John E. Pates  
Sheriff*

*Mon Est  
Ly cut  
(7/24/24)*

Annie Harris

vs.

Richard T. Harris

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

Ordered by the Circuit Court of Baltimore City this ~~28~~<sup>17</sup> day of ~~June~~ *July* 1924  
that the Defendant appear before this Court in person,  
on the ~~22~~ day of ~~June~~ *July*, 1924, 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 2nd day of October, 1922, directing the  
payment of Alimony, pendente lite, by him to the Plaintiff  
provided a copy of this Order be served on the said Defendant  
on or before the ~~19~~ day of ~~June~~ *July* 1924

Arrears to and including June 16, 1924 - \$30.00

*Beal Elliott Esq. Clerk*



11.2  
Circuit Court

19...17

Docket No.....

Amir E Harris

vs.

Richard J. Harris

COMMITMENT

B 16350

{ 27 1/2 }

Fd. 13<sup>th</sup> Dec. 1924

Kept In Jail  
John E. Pater  
Sheriff

.....  
Annie E. Harris  
vs.  
Richard T. Harris  
.....  
.....

IN THE  
**Circuit Court**  
CF  
BALTIMORE CITY.

The Defendant Richard T. Harris, having been brought before the Court under the writ of attachment heretofore issued against him, as for a contempt, for his non-compliance with the order of this Court passed Conditionally on the.....day of....., 19....., and made final on the.....day of....., 19....., and being still in contempt for his non-compliance therewith, the Court being satisfied from the proof in the cause that he is able to comply with the said order; it is this 10 day of October,

1924., ORDERED, by the authority of the Circuit Court of Baltimore City, that the said.....  
Richard T. Harris pay the Costs of the attachment and stand committed to the custody of the Warden of the Jail of Baltimore City until he shall have purged the contempt by his compliance with the said order, and that the Sheriff of Baltimore City deliver the body of the said Richard T. Harris to the said Warden, together with a copy of this order to be furnished by the Clerk of this Court.

Charles F. Brown

Cir. Ct.

19

No.....

*Harris*

vs.

*Harris*

*90*

**Attachment in Equity.**

*B*

No.....

Filed .....day of .....19

10

*Rec'd in part  
of m & p  
Sherry*

(ATTACHMENT IN EQUITY)

MARYLAND, Sc.

# The State of Maryland

To the Sheriff of Baltimore City, Greeting:

You are Hereby Commanded, that you attach the bod<sup>y</sup> of

*Richard J. Harris 902 Lutter Pine*

if he shall be found in your bailiwick, and h<sup>m</sup> sake keep, so that you have h<sup>m</sup> before

the Judge of the Circuit Court, of Baltimore City, at the Court house in the same city, on

~~the~~ *When apprehended* day of *1924*, to answer as well touching a certain contempt

by h<sup>m</sup> committed in not

*Obeying Order of Court*

as well as to such other matters and things as shall be then and there alleged against h<sup>m</sup>

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

*8* day of *September*

19 *24*

Issued the

*9* day of *October*  
*Clark Whitehead*  
Clerk.

19 *24*

*Let attachment issd*

*Oct 9/1924*

*to Lane 725m*

112 B Cir. Ct.  
19 17 No.....

Harris

VS.

902 Little Pine St.  
Harris

Attachment in Equity.

OK

B No. 16350

Filed ..... day of ..... 19 27 Sept 24

no

"Attached"

9/29/1924 Quashed on Court's  
Order Judge  
John L. Potee,  
Sheriff.

Sheriff's Cost \$2.00  
Cherki " \$1.00

Total \$3.00

Paid  
9/29/1924  
EP

(ATTACHMENT IN EQUITY)

MARYLAND, Sc.

The State of Maryland.

To the Sheriff of Baltimore City, Greeting:

You are Hereby Comanded, that you at tach the bod<sup>y</sup> of

Richard Harris

if he shall be found in your bailiwick, and h<sup>is</sup>ake keep, so that you have h<sup>im</sup> before

the Judge of the Circuit Court, of Baltimore City, at the Court house in the same city, on

the ~~the~~ When apprehended day of ~~19~~ , to answer as well touching a certain contempt

by h<sup>im</sup> committed in not

Obeying order of Court

as well as to such other matters and things as shall be then and there alleged against h<sup>im</sup>

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

8<sup>th</sup> day of Sept 19<sup>24</sup>

Issued the

29<sup>th</sup> day of Sept 19<sup>24</sup>

Clark R. Natusford  
Clerk

Let attachment issue

9/27/24

9/29/24 Searched on ciats

Charles F. Stern

Charles F. Stern

$\frac{112}{1917}$  B  $\frac{112}{1917}$

Armin Harris

4

Richard D Harris

B 16350  
L297

Ed 3 Oct 1924

Annie E. Harris

vs

Richard T. Harris.

:  
:  
:  
:  
:  
:

In the Circuit Court

of

Baltimore City

ORDERED by the Circuit Court of Baltimore City this Third day of November 1924, that the Warden of the Baltimore City Jail be and he is hereby directed to release from his custody the body of Richard T. Harris, heretofore committed to jail for contempt of Court, said Harris having purged himself of said contempt.

*C. Hall & Son*



3112/1147

<sup>112</sup>  
<sup>1917</sup> In The <sup>57B</sup>  
Circuit Court of  
Baltimore City.

Richard T. Harris  
VS  
Annie Harris.

Petition.  
*for Alimony etc*

Mr. Clerk:  
Please file.

*Hawkins & McMechen*

Solicitors for Petitioner.

*1916350*  
*2014*

HAWKINS & McMECHEN  
ATTORNEYS-AT-LAW  
14 PLEASANT STREET  
BALTIMORE, MD.

FILED *12 March 1922*

Richard T. Harris                    )    In The  
  vs    )    Circuit Court of  
Annie Harris                            )    Baltimore City.

To the Honorable, the Judge of the said Court:

The Petition of the defendants, represents:

1. That the plaintiff has filed his Bill of Complaint in this Court, praying for a divorce a vinculo matrimonii from your petitioner on the grounds of desertion and abandonment, as will appear by reference to said Bill of Complaint.

2. That your petitioner altogether denies said charge, and affirms that when said cause comes on to be heard, it will be seen by the Court, that the said charge is entirely destitute of foundation.

3. That while denying that she has deserted, or abandoned, her husband, as alleged in his said Bill of Complaint, your Petitioner admits it to be true that said plaintiff has not for more than five years lived with her, although she has always been and is now willing and anxious for him to do so.

4. That your petitioner is advised that she is entitled to have an order passed by this Honorable Court requiring the plaintiff to pay her a reasonable and proper sum for alimony pendente lite for her personal support and also a reasonable and proper sum to enable her to defray the necessary expenses of her defense to said Bill and to compensate counsel whom she has retained to defend the said suit.

5. That the plaintiff is a pensioner receiving your petitioner is advised a sum not less than Seventy-two dollars (\$72.00) per month from the United States Government and was in addition for two years engaged in the transfer business with his own teams from which he made Twenty dollars (\$20.00) and Twenty-five dollars (\$25.00) per week clear of expenses; while your petitioner is

without means of support except from her own labor and the charity of her friends.

6. That in view of the circumstances set forth in the above paragraph your petitioner is advised that she is entitled to a liberal allowance to be made for her defense, and the amount of her alimony pendente lite should also be fixed according to the plaintiff's means and ability.

Your petitioner, therefore, prays your Honor to pass an order requiring the said Richard T. Harris to pay her for alimony pendente lite such a sum and at such intervals, as to the Court shall seem proper; and also such other sum, as to the Court shall seem proper, to enable your petitioner to defray the expenses to which she will be put in defending said suit, including a reasonable fee to her counsel.

And as in duty bound, etc.

Hawkins & McMechan

Solicitors for Petitioner.

<sup>Hed</sup>  
Annie X Harris  
mark. Petitioner.

STATE OF MARYLAND, BALTIMORE CITY, to wit:

I HEREBY CERTIFY, that on this 10<sup>th</sup> day of March, 1922, before me, the subscriber, a Notary Public, of the State of Maryland, in and for Baltimore City, aforesaid, personally appeared Annie Harris, the petitioner in the foregoing paper and made oath in due form of the law, that the matters and facts therein stated are true to the best of her knowledge and belief.

Mary B. Cook  
Notary Public.