

IN THE CIRCUIT COURT OF

BALTIMORE CITY

63 B 242

CLIFTON HAUGHTON

1923

VS.

ANNA HAUGHTON

1735 Druid Hill Ave.

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

B 25202

J. Steward Davis
ATTORNEY FOR COMPLAINANT.

DAVIS & BISHOP

ATTORNEYS AT LAW

BANNER BUILDING

14 S. PLEASANT STREET

BALTIMORE, MD.

At 17 April 1923
215 St. Paul Place

3/15/18

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CLIFTON HAUGHTON ; IN THE CIRCUIT COURT
VS. : OF
ANNA HAUGHTON : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:-

(1) That he was married to his wife, Anna Haughton, on the 24th of March, 1919 and with whom he resided until about the 9th day of April, 1920.

(2) That though the conduct of your Orator toward the said Anna Haughton has always been kind, affectionate and above reproach, she has, without any just cause or reason abandoned and deserted him and has declared her intentions to live with him no longer, and that such abandonment has continued uninterruptedly for more than three years and is deliberate and final, and the separation of the parties is beyond any reasonable expectation of reconciliation.

(3) That your Orator has not lived or co-habited with the said defendant since said desertion.

(4) That there are two children as result of said marriage: Catherine, age four years and Clifton, Jr. age three years. Your Orator asks the care and custody of Clifton, Jr. Catherine is in the custody of one Mrs. Cook of 415 W. Hoffman Street and it is agreeable to the petitioner that the said Mrs. Cook retain the custody of said Catherine.

(5) 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 Anna Haughton.

(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 Anna Haughton, 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.

J. Steward Davis
SOLICITOR FOR COMPLAINANT.

EQUITY SUPPLEMENT

The State of Maryland

252-300

242
192 3 B63 Docket No. Ct. Ct.

Haughton

"
Haughton
1735 Round Hill Ave

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. ^B 25 20 2
^{Pho}

Filed ^{14 May} 1923
^{19 June}
J. S. Davis SOLICITOR

Hon. E. J. Thomas A. McKelvey
(Retreat) Sheriff

5/15 1923

ISSUED TO June RETURN DAY 1923

224. Return.
Summoned and a copy of the process left
with the defendant -

Thomas A. McKelvey

Fees \$ 0.80

(Witness)
5/31-23

Sheriff

EQUITY SUBPOENA

The State of Maryland

To

Anna Haighton

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

Clepton Haighton

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 JAMES P.-GORTER, Chief Judge of the Supreme Bench of Baltimore City, the **12th** day of **March** 192 **3**

Issued the **17** day of **April**, in the year 192 **3**.

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.)