

73 325/1924

2/19/1924

IN THE
CIRCUIT COURT NO. 2 OF
BALTIMORE CITY.

Wilhelmina Henry

VS.

Frank. W. Henry

Bill for Diverde

A. V. M.

Mr. Clerk,

Please file, &c.

7/24/1924 B
1

E. Jackson

Solicitor for the Plaintiff.

FILED 10th July 1924

Wilhelmina Henry :

IN THE

VS.

Frank W. Henry

:CIRCUIT COURT NO. 2 OF BALTIMORE CITY.

To the Honorable, the Judge of said Court:

Your Oratrix complaining respectfully says:-

1. That the parties hereto intermarroed in Baltimore City, State of Maryland on or about the 15th day of June 1915, and lived together as man and wife till on or about the 14th day of October 1923, when the defendant committed the crime of Adultery with divers lewd women in Baltimore City whose names will be disclosed at the hearing of this case.
2. That your Oratrix has not condoned the offense; neither has she lived nor cohabited with the said defendant since the discovery of his said indiscreet conduct.
3. That there are two children born as a result of said marriage, Ellwood P. age 2 years and Serita age 11 months respectively. *(3 1/2) that the conduct of your oratrix has been above reproach in all respects.*
4. That both parties are residents of the City and State, and have been for more than two years last past.
5. That your Oratrix is without means to prosecute this case and support herself and the said two minor children; having been advised by Counsel that she is entitled to have a degree passed by this Honorable Court awarding her a certain sum as Alimony pendent lite and permanent Alimony and a reasonable sum to compensate her Counsel for services in the same.
6. That the defendat Frank W. Henry is a man with means and makes about One Hundred Dollars per month.

Wherefore your Oratrix prays that an Order may issue to the said defendant Frank W. Henry commanding him to show cause on or before a certain day to be therein named why he should not pay to your Oratrix a certain sum as Alimony pendent lite and permanent alimony also a reasonable Counsel fee..

Your Oratrix prays for a Divorce A Vinculo Matrimonii the custody of said minor children and such other and further

relief as the case may require.

May it please your Honor to grant unto your Oratrix the Writ of Subpoena directed unto the said defendant Frank W. Henry commanding him to be and appear in this Court on some day certain to be therein named and perform such decree as may be passed in the premises. And as in duty bound. &c.

E. Jackson
.....
Solicitor for the Plaintiff.

State of Maryland :
 :
Baltimore City : TO WIT.

I hereby certify that on this the 1st day of *July* 1924, before me, the subscriber, a "NOTARY PUBLIC", of the State of ~~the State of Maryland~~ ~~in and for Baltimore City~~, aforesaid, personally appeared ~~Wilhelmina Henry~~ and made oath in due form of Law that the foregoing matter is true to the best of her knowledge and belief.

Helena C. Fisher
.....
NOTARY PUBLIC.

Upon the foregoing petition and affidavit it is ordered by the Circuit Court No. 2 of Baltimore City, this day of 1924, that the defendant Frank W. Henry pay to the plaintiff Wilhelmina Henry the sum of \$ as Alimony pendenti lite and permanent alimony per week before the day of 1924, provided a copy of this Order is served on the defendant Frank W. Henry on or before the day of 1924.

SERVE ON

Spencer H. Henry

B 33 Docket 328
1924
Circuit Court No. 2

Henry

vs.

Henry

Order Counsel Fee and Alimony
Pendente Lite

ORDER *1 copy 7/15/24*

No. *24197* B.
3-5-7

Copy Copied
Copy order Copied
Copy order order Copied

Filed *10 July 1924*
" *21 July 1924*
" *6 August 1924*

Non Est John E. Potter Sheriff

(Lacy)

(2nd Return)

Non Est

John E. Potter Sheriff

(Lacy)

(3rd Return)

Copy of the within Order of Court served on Frank W. Henry on the 7th day of August, 1924, in the presence of John J. Lacy John E. Potter Sheriff

New \$0.50

Wilhelmina Henry

vs.

Francis W. Henry

IN THE
CIRCUIT COURT No. 2

OF

BALTIMORE CITY

May

TERM, 1924

ORDERED BY THE COURT, this *10* day of *July*, 1924,

that the defendant *Francis W. Henry*

pay to the plaintiff *Wilhelmina Henry*

the sum of *nine*

Dollars per week, during the continuance of this suit as Alimony, pendente lite, unless cause to the contrary be shown on or before the *25*

day of *July*, 1924, provided a copy of this Order be served on the said defendant

Francis W. Henry on or before the *15*

day of *July*, 1924, the question of Counsel fee being reserved for the further determination of this court.

George A. Sackett

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court No. 2 of Baltimore City, this *21* day of *July*, 1924, that the time for showing cause under said Order be extended to the *6* day of *August*, 1924, and the time for service of a copy of the same be extended to the *26* day of *July*, 1924.

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 No. 2 of Baltimore City, this *6* day of *August*, 1924, that the time for showing cause under said Order be extended to the *21* day of *August*, 1924, and the time for service of a copy of the same be extended to the *11* day of *August*, 1924.

Charles F. Stein

P 2/2

Ct. Ct. No. 2

325
1924

B Docket No. 33

Henry vs.

Henry

Subpoena to Answer Bill of Complaint

Pro

No. 24197 B

6
Copy Copied

Filed 11 August 1924

E. Jackson Solicitor.

Summoned and a copy of the process left
with the defendant. John E. Potee Sheriff
Fees \$0.80

(copy)
8/24

EQUITY SUBPOENA

The State of Maryland

To

Frank N. Henry

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 *August*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Wilhelmina Henry

against you exhibited in the CIRCUIT COURT No. 2 OF BALTIMORE CITY.

HEREOF fail not, as you will answer to the contrary at your peril:

WITNESS, the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the *14* day of *July*, 192*4*

Issued the *6* day of *August*, in the year 192*4*
John Pleasant
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).

IN THE CIRCUIT COURT NO. 2

OF

BALTIMORE CITY.

B325

1924

WILHEMINA HENRY

VS.

FRANK HENRY

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

Davis & Evans
ATTORNEYS FOR RESPONDENT

No 24197 B
8.

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE
BALTIMORE, MD.

Aug 18 August 1924

WILHEMINA HENRY : IN THE CIRCUIT COURT NO.2
VS. : OF
FRANK HENRY : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The respondent answering the Bill of Complaint in the above case, exhibited, respectfully says:

1. That he admits the marriage as alleged in the first paragraph of the bill of complaint, but denies with great emphasis the allegations of adultery.
2. That he neither admits nor denies the assertion that the offense has not been condoned for he denies the offense.
3. That he admits the allegations as contained in the third paragraph of the bill of complaint.
4. That he admits the allegations as contained in the fourth paragraph of the bill of complaint.
- 5.& 6. That he denies that he is employed at a wage of one hundred dollars per month as alleged in the sixth paragraph, but avers that his regular wages are fifty two dollars per month.

WHEREFORE your respondent prays that the bill be dismissed with costs to the plaintiff.

Davis & Evans
ATTORNEYS FOR RESPONDENT.

E. Jackson

40

118

Cir. Ct. No. 2

325 B
1924

Docket No. 33

Wilhelmina Henry

vs.

Frank M. Henry

MOTION FOR HEARING

Mr. Clerk
Please file
E. Jackson

No. 24197 B
July 7th

9

Filed, 20 August 1924

Circuit Court No. 2

Davis & Evans

Wilhelmina Henry

vs.

Frank W. Henry

IN THE
Circuit Court No. 2

OF
BALTIMORE CITY

The *plaintiff W. Henry* by *E Jackson*
her

Solicitor, applies to have the above entitled cause placed in the

Trial Calender for hearing on *the question*
of alimony &c

In conformity with the First Equity Rule.

E Jackson
Solicitor for *Plaintiff*

Serve on

Lewis & Evans

Plaintiff

Served admitted Aug 20, 1924

[Signature]

Cir. Ct. No. 2

325-1924

B

Docket No. *33*

Henry

vs.

Henry

NOTICE AS TO HEARING

1 copy ✓

No. *24197 B*

Copy - Copied

Filed *20 August*, 192*4*

Hecht

*Copy of the within Notice Served on Lewis and Evans
Solicitors on Aug 20/24 in Presence of Louis Hecht*

*John E. Potee
Sheriff*

Fee \$0.50

*215
St Paul
St*

W. Helmsal Henry
vs.
Francis H. Henry

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

Upon application made by the Solicitor for the *Plaintiff*

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 *Monday*

when reached in due course on the said calendar.

JOHN PLEASANTS,

Clerk Circuit Court No. 2.

SERVE ON

B ³²⁵/₁₉₂₄ Docket

Circuit Court No. 2

Wilhelmina Henry

vs.

Frank W. Henry

Primal for
Order ~~Counsel Fee~~ and Alimony
~~Pendente Lite~~

ORDER

No. *24197* B.
(11)

Filed *29 August* 19*24*

Wilhelmina Henry

vs.

IN THE
CIRCUIT COURT No. 2

OF

BALTIMORE CITY

Frank W. Henry

July

TERM, 19 24

ORDERED BY THE COURT, this 29th day of August, 1924

that the defendant Frank W. Henry

pay to the plaintiff Wilhelmina Henry

the sum of Seven and one half

Dollars per week, during the continuance of this suit as Alimony, pendente lite, ~~unless cause to the contrary be shown on or before the~~

~~day of~~ , 19 , ~~provided a copy of this Order be served on the said defendant on or before the~~

~~day of~~ , 19 , the question of Counsel fee being reserved for the further determination of this court.

Ch. Frank

TRUE COPY—TEST:

Clerk.