

IN THE CIRCUIT COURT OF

BALTIMORE CITY

*B 236  
1926.*

ARTHUR HOLMES

VS.

ALVERTA HOLMES

*1065 Myrtle St*

BILL FOR DIVORCE.

Mr. Clerk:-

Please file.

*B 30717*

*Deut + Swans*

ATTORNEYS FOR PLAINTIFF

*(1)*

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

*fd 1<sup>st</sup> June 1926*

ARTHUR HOLMES

:

IN THE CIRCUIT COURT

VS.

:

OF

ALVERTA HOLMES

:

BALTIMORE CITY.

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

1. That he was married to his wife, Alverta Holmes, on the 15th day of June, 1913 and with whom he resided until the 24th day of May, 1926.
2. That ever since said marriage your Orator has behaved himself as a faithful, chaste and affectionate husband toward the said Alverta Holmes.
3. That the said Alverta Holmes has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned men, whose names are unknown to your Orator and said offense has not been condoned by your Orator.
4. That your Orator has not lived or co-habited with said defendant since he discovered said adulteries.
5. That there are no children born as issue of said marriage.
6. That your Orator and the defendant are owners of 1065 Myrtle Avenue as tenants by the entirety; that irreconcilable differences as evidenced by the above allegations have arisen between them, to wit: that because of the disagreement now existing, the parties to the suit are unable to come to any common understanding as to the weekly payments on account of the mortgage now on the aforementioned property; that because of said disagreement arrearages in said mortgage payments will result and the interests of the parties to this suit will be seriously damaged,

if aforementioned property is sacrificed at a forced sale.

7. That your Orator has exerted every reasonable effort to effect a reasonable basis of settlement whereby an equitable adjustment of the rights to the parties to this suit might be reached.

8. That by reason of the premises, the equity of both your Orator and the respondent in the aforementioned premises, at present, is such that if the premises are sold, the present mortgage, etc. now against the property will be discharged and a large surplus will be remaining to be divided between your Orator and the respondent; but if this Honorable Court does not intervene, the resultant expenses attendant upon foreclosure, and the deminished prices that the premises will bring at forced sale, will be such as to work a material injury upon both the parties to this suit.

9. 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 of Complaint.

TO THE END, THEREFORE, YOUR ORATOR PRAYS:

(a) That a receiver or receivers be appointed to take charge of the premises 1065 Myrtle Avenue and to preserve or dispose of the same under direction of this Court.

(b) That he may be divorced a Vinculo Matrimonii from the said Alverta Holmes.

(c) 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 Alverta Holmes, 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.

*Blair & Evans*

ATTORNEYS FOR PLAINTIFF



D569

Ct. Ct.

B-236

192 6

Docket No.

Arthur Holmes

vs.

Alverta Holmes

10 65 Myrtle av

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pro

No.

B-30717

(2)

Filed

8 June

1926

Davis & Evans

SOLICITOR

10

Summoned and a copy of the Process left with the defendant

(Becky)  
(6/2/26)

John E. Potter  
Sheriff

Fees \$0.80

EQUITY SUBPOENA

The State of Maryland

On ALVERTA HOLMES

1065 Myrtle Avenue

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

ARTHUR HOLMES

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 10th day of May 1926 Issued the 1st day of June, in the year 1926.

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.