

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

*B 234
1926*

ELOISE KEYES

VS.

STERLING KEYES

625 N. Pitcher St.

BILL FOR DIVORCE

B30714

Mr. Clerk :-

17

Please file.

Davis & Coons

ATTORNEYS FOR PLAINTIFF

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

28 May 1926

ELOISE KEYES : IN THE CIRCUIT COURT

VS. : OF

STERLING KEYES : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, Sterling Keyes on the 29th day of November, 1919 and with whom she resided until the 10th day of July, 1925.
2. That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said Sterling Keyes.
3. That the said Sterling Keyes has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned women whose names are unknown to your Oratrix and said offense has not been condoned by your Oratrix.
4. That your Oratrix has not lived or co-habited with said defendant since she discovered his said adulteries.
5. That there are three children born as issue of said marriage; Allison, age six years; Melvin, age four years and Helen, age three years for whom the plaintiff asks the custody.
6. That your Oratrix is destitute and without means of financing the expenses of this suit and that she is advised by Counsel that she is entitled to have an order passed by this Honorable Court awarding some amount as alimony pendente lite, permanent alimony and some amount to compensate her Solicitors. The defendant is employed and earns thirty-five dollars per week.

7, That both your Oratrix 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:

(a) That your Oratrix may be divorced A Vinculo Matrimonii from the said Sterling Keyes.

(b) That she may resume her maiden name BOWEN.

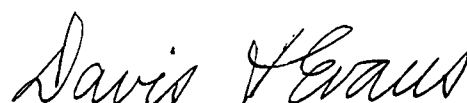
(c) Alimony pendente lite.

(d) Permanent alimony.

(e) Such other and further relief as her case may require.

May it please your Honor to grant unto your Oratrix the Writ of Subpoena directed against the said Sterling Keyes, commanding and requiring him 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.



ATTORNEYS FOR PLAINTIFF.

P 566

Ct. Ct.

B-234
192 6 Docket No.

ELOISE KEYES

vs.

STERLING KEYES

625 Pitcher
SUBPOENA TO ANSWER BILL OF COMPLAINT

Pw

No. B-30714

(2)

Filed 2 June, 1926

Davis & Evans SOLICITOR

H

*Summoned and a copy of the Process left with
the defendant
(Kozlovsky)
5/31/26*

*John E. Pater
Sheriff*

Fee \$0.80

EQUITY SUBPOENA

The State of Maryland

On STERLING KEYES

625 N. Pitcher Street,

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

ELOISE KEYES

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 28th day of May, in the year 1926.

Handwritten signature of Charles R. Mulford, 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.

B Docket 234
1926

CIRCUIT COURT.

Eloise Keyes

vs.

Sterling Keyes,
625 N. Polcher St.

Order for Alimony

Pendente Lite

ORDER

B No. 30714B

() <3>

\$35-^{per}week
3 child

Fd: Fd 29 May 1926
14

Copy of ~~the~~ Order of Court served on
Sterling Keyes on the 31st day of May 1926
in presence of Joseph H. Rozovsky
John E. Patee
Sheriff

Fees \$0.50

IN THE
CIRCUIT COURT

OF
BALTIMORE CITY

May TERM, 1926.

Eloise Keyes.

vs.

Sterling Keyes.

ORDERED BY THE COURT this 29th day of May 1926.

that the defendant *Sterling Keyes.*

pay to the plaintiff *Eloise Keyes.*

the sum of Eighteen

Dollars per week, during the continuance of this suit, accounting from the 29th

day of May 1926 to the said plaintiff *Eloise Keyes.*

as alimony, *pendente lite* unless cause to the contrary be shown on or before the 14th

day of June 1926, provided a copy of this Order be served on the said defendant

Sterling Keyes. on or before the 7th

day of June 1926.

E. J. Frank

TRUE COPY—TEST:

CLERK

234-1926

IN THE
CIRCUIT COURT
of
BALTIMORE CITY

*B 234
1926*

Eloise Keyes

vs

Sterling Keyes

*B 30714
(4)*

ANSWER

Mr. Clerk;

Please file, etc.

William E Thomas

Sol. for Respondent
109 E. Pleasant St.
Cal. 6396

Ed 12 June 1926

Eloise Keyes :
: IN THE
: CIRCUIT COURT
vs :
: OF
Sterling Keyes: :
: BALTIMORE CITY

To The Honorable, The Judge Of Said Court:

The answer of Sterling Keyes to the Bill of Complaint filed in the above entitled case, respectfully represents.

First. Answering the first, fifth and seventh paragraphs of said Bill of Complaint, your respondent admits the allegations contained therein.

Second. Answering the second and fourth paragraphs of said Bill of Complaint, your respondent absolutely denies the allegations contained therein and puts the plaintiff to her strict proof.

Third. Answering the third paragraph of said Bill of Complaint, your respondent denies that he has ever committed adultery and further says that the complainant left him on or about July 10, 1925, without just cause or reason and that he has not lived with her since said abandonment.

Fourth. That he emphatically denies earning Thirty-five Dollars per week. But that he does earn Seventeen Dollars per week. And further that he is required by order of court to pay Eight Dollars per week for the support of the three children named in the Bill of Complaint.

And now having answered all the material allegations of the plaintiffs and Order Nisi your respondent prays that the same may be herein dismissed with cost in this behalf expended.

And as in duty bound, etc.

Sterling Keyes
Respondent.

William E. Thomas
Sol. for Respondent.

State of Maryland, Baltimore City, to wit:

This is to certify that on this // day of June, in the year nineteen hundred and twenty-six, before me, the subscriber a notary public of the State of Maryland, in and for Baltimore City aforesaid, personally appeared Sterling Keyes, and made oath in due form of law that the matter and facts stated in foregoing answer are true to the best of his knowledge and belief.

Witness my hand and notarial seal.

Boyd D. Owens

Notary Public.

Davis + Evans

192

66 B
234
No.

Ct. Ct.

Docket

Elvise Keys

vs.

Sterling Keys

MOTION FOR HEARING

B30714
No. 157

Wm. E. Thomas.

Filed 13 day of Aug 1926

Elrose Keyes
vs.
Sherling Keyes

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The *Complamant* by *Davis v Evans*

Solicitor *S* applies to have the above entitled cause placed on the Trial Calendar
for hearing *on alimony pendente lite*

in conformity with the First Equity Rule.

Solicitor for *Davis & Evans*

Serve on

Wm. E. Thomas 109 1/2 Pleasant

Admit Service
William E. Thomas

Ct. Ct.

234

1926

No. B-66 Docket

Keyes

vs.

Keyes

NOTICE OF HEARING

B- No. 30714

(6)

No.

Filed 13 day of Aug 1926

H.

Copy of the within Note of Hearing served on
William E. Thomas by letter on the 17th day of August
1926 in the presence of Louis Hecht.
John E. Peter
Fees \$1.50
Shurtz.

Eloise Keyes

vs.

Sterling Keyes

IN THE

CIRCUIT COURT

OF BALTIMORE CITY

Upon application made by the Solicitor for the

Complainant

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 Pendente Lite

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

Circuit Court

²³⁴
1926 B No. 66 Docket.

Eloise Keyes

vs.

Sterling Keyes

Final Order, Counsel Fee and Alimony
Pendente Lite.

No. 30714 B.

7

Filed 23 August 1926

CIRCUIT COURT
OF
BALTIMORE CITY

Eloise Keyes
vs.

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

Sterling Keyes

July

Term, 1926

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 23rd day of August 1926, that the Defendant

pay to the

the sum of Dollars, as counsel fee

for the Solicitor of the and that he

further pay the sum of Eight Dollars per week,

to the said Plaintiff

as Alimony *pendente lite* accounting from the 23rd day of August 1926

and continuing until the day of 19, (should this suit be

so long pending) or until the further order of this Court.

By consent of counsel.

Payable through the prisoners aid association,

George J. Soler

No. _____
CIRCUIT COURT

vs.

To. _____

The above case in which you appear as solicitor, is
in the assignment for hearing on _____
at 10 A. M.

CHARLES R. WHITEFORD,

Clerk.

Attachment

187

not returned

3/18/71

Circuit Court

234
1926

Docket B66

Eloise Keyes

vs.

Sterling Keyes

"Sapp"
Petition for leave to take
Testimony and Order of
Court thereon

B No. 30714
[9]

Filed 31 Dec 1926

Eloise Keyes

vs.

Sterling Keyes

IN THE

Circuit Court

OF

BALTIMORE CITY

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

THE PETITION OF

Eloise Keyes

in this case, respectfully shows that *she* desire *s* to take testimony in this case, and respectfully pray *s* that leave be granted to do so before one of the Standing Examiners of this Court.

Davis Evans
Solicitor for *plaintiff*

ORDERED, this *31* day of *December* 1926, that leave be granted to the parties to the cause, to take testimony, as prayed, before any one of the Standing Examiners of this Court.

Evans