

IN THE CIRCUIT COURT OF

BALTIMORE CITY

B 379
1927

ALICE KING

VS.

PAUL KING.

*6 Shiptley ave
Catonsville Md.*

BILL FOR DIVORCE.

Mr. Clerk:-

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF

B 32089
11

DAVIS & EVANS
ATTORNEYS AT LAW

Filed 10th Aug 1927

ALICE KING : IN THE CIRCUIT COURT

VS. : OF

PAUL KING : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, Paul King, on the 28th day of February, 1918 and with whom she resided until the 2nd day of August, 1927.
2. That for some years past the said Paul King, her husband, has treated her with great cruelty, harshness and brutality, at times striking and beating her and that his conduct has now become so intolerable that she can endure it no longer.
3. That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said Paul King and her entire conduct has always been above reproach.
4. That there are two children born as result of said marriage; Paul King, age nine years and Calvin King, age five years.
5. That her husband is employed as a chauffeur and earns thirty dollars per week.
6. That your Oratrix is wholly destitute of means of supporting herself during the pendency of this suit, or of defraying the costs and expenses attending the prosecution of the same.

TO THE END, THEREFORE, YOUR ORATRIX PRAYS:

- (a) That she may be divorced A Mensa Et Thoro from the said Paul King her husband.
- (b) That your Oratrix may have the guardianship and custody of her two minor children, Paul and Calvin.
- (c) That your Oratrix may be declared to be entitled to receive by way of alimony, such an allowance out of her said husband's earnings as may be proportioned to the means and station in life of her said husband.
- (d) That, in the meantime, the said Paul King may be required to pay unto your Oratrix a reasonable sum for her support and maintenance during the pendency of this suit, and such sum or sums of money as may enable your Oratrix to employ counsel to prosecute this suit and to defray the necessary costs and expenses thereof.
- (e) That your Oratrix may have 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 Paul King, 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.

Alice King.
PLAINTIFF

Davis Thomas
ATTORNEYS FOR PLAINTIFF

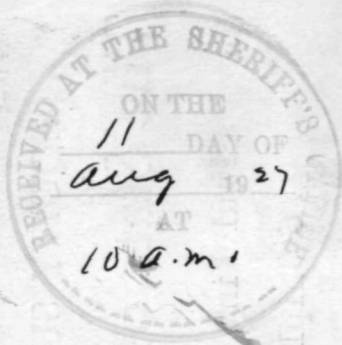
STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this *10th* day of August, in the year one thousand nine hundred and twenty seven, before me, the subscriber, a Notary Public of the State of Maryland, *in* and for the City of Baltimore aforesaid, personally appeared Alice King and made oath in due form of law that the matters and facts in the foregoing bill are true as therein stated.

AS WITNESS my hand and Notarial Seal.

Walter C. Fisher

NOTARY PUBLIC.



P-348

Ct. Ct.

B-379
1927 Docket No.

Alice King
vs.
Paul King

#6 Shubley a Catonsville
SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B-32089

(2) (4)

Filed 13 Sept, 1927
11 10 Oct 1927
Davis & Evans SOLICITOR

15

John & Patie
Sheriff

non est
Wyatt

9/13 1927
REISSUED TO October Return Day, 1927
Levasse Whiteford
John & Patie Clerk
Sheriff

non est
Wyatt

EQUITY SUBPOENA

The State of Maryland

To Paul King
6 Shipley Avenue
Catonsville, Md.

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

Alice King

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 11th day of July 192 7. Issued the 10th day of August, in the year 192 7.

Handwritten signature of Clerk and the word 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.

Ct. Ct.

192

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed....., 192....

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

To Paul King

6 Shipley Avenue

Catonsville, Md.

Copy

REISSUED TO October ^{9/13} 1927.
Return Day, 1927
Chas R Whiteford
Clerk

of Baltimore City, Greeting:

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Chas R Whiteford Clerk

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B Docket 379
1927

CIRCUIT COURT.

Alice King

vs.

Paul King

Order for Alimony

Pendente Lite

ORDER

B No. 32089
(3)

Fd: 11" Aug, 1927

19.



Now best.
John S. Tota
Sheriff

3/13/3/49

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

Alice King

vs.

Paul King

July TERM, 1927

ORDERED BY THE COURT this 11th day of August 1927

that the defendant Paul King

pay to the plaintiff Alice King

the sum of Ten

Dollars per week, during the continuance of this suit, accounting from the 10th

day of August 1927 to the said plaintiff Alice King

as alimony, *pendente lite* unless cause to the contrary be shown on or before the 26th

day of August 1927, provided a copy of this Order be served on the said defendant

Paul King on or before the 30th

day of August 1927

Joseph N. Newman

TRUE COPY—TEST:

CLERK

B Docket.....

CIRCUIT COURT.

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

Order for Alimony

Pendente Lite

ORDER

B No.

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Fd:

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CIRCUIT COURT

OF
BALTIMORE CITY

Alice King

vs.

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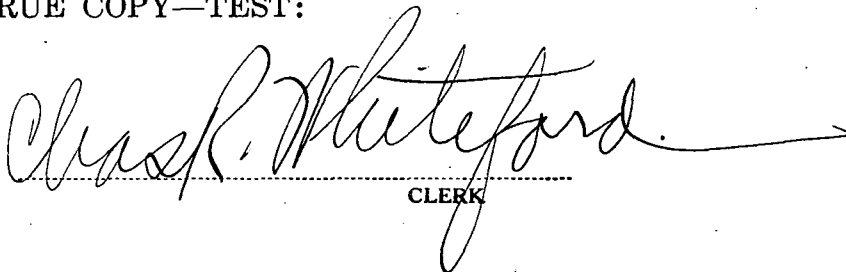
day of August 1927, provided a copy of this Order be served on the said defendant

Paul King on or before the 20th

day of August 1927.

Joseph N. Ulman

TRUE COPY—TEST:


CLERK