

7/17/26

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

B 72  
1926

EDNA KING

VS.

ROBERT KING.

Md penitentiary

BILL FOR DIVORCE.

B 30403

Mr. Clerk :-

Please file.

Davis Evans  
ATTORNEYS FOR PLAINTIFF.

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

FD 12 Feb 1926

EDNA KING

:

IN THE CIRCUIT COURT

VS.

:

OF

ROBERT KING

:

BALTIMORE CITY.

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, Robert King on the 17th day of October, 1921 in Baltimore City, and with whom she resided until the 15th day of April 1922 when the defendant, deserted the plaintiff.
2. That though the conduct of your Oratrix toward the said Robert King has always been kind, affectionate and above reproach, he has, without any just cause or reason, abandoned and deserted her and has declared his intentions to live with her 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 Oratrix has not lived or co-habited with the said defendant since said desertion.
4. That there are no children as issue of said marriage.
5. 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 Robert King.

(b) That she may resume her maiden name, WILSON.

(c) That she 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 Robert 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.



ATTORNEYS FOR PLAINTIFF.

P434

Ct. Ct.

B-72  
192 6      Docket No.

Edna King

vs.

Robert King

954 Forrest St

**SUBPOENA TO ANSWER BILL OF COMPLAINT**

No. B-30403

(2)

Filed 15 Feb, 1926

J. Steward Davis      SOLICITOR

4

*Summoned And a Copy of the Process  
left with the defendant Paul E. Potee  
(Morlaw)  
2-15-26  
View \$0.50  
Shantiff*

EQUITY SUBPOENA

The State of Maryland

To ROBERT KING

MARYLAND PENITENTIARY, City

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

EDNA 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 January 1926. Issued the 12th day of February 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.