

3/12/12/90

Intercepted by
Baltimore City 1919

Maud Lee

↳

William Lee

Bill for Duorce A. V. ...

Mr (Perh please file

(J. Steward Davis)

B 20397

(1)

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET
BALTIMORE MD.

AP 16 ... 1919

17

Maud Lee

In The Circuit Court

Vs.

of

William Lee

Baltimore City.

To The Honorable, The Judge of Said Court:

Your Oratrix, complaining, respectfully says:

FIRST, That the parties hereto were married on or about the 9th. day of March -1913 and lived together as man and wife until on or about November 15, 1917. Said marriage occurred in Baltimore City, State of Maryland.

SECOND, That Your Oratrix is a resident of the city of Baltimore, state of Maryland, and has been for more than two years prior to the filing of this bill of complaint. That the respondent is a non-resident of the city and state and when last heard of was in Philadelphia Pa.

THIRD, That though the conduct of Your Oratrix towards her husband has always been kind, affectionate, and above reproach, he without any just cause or reason, abandoned Your Oratrix; to live in adultery with a said Lily Diggs. That the said William Lee has on divers days and times committed the crime of adultery with the afore mentioned "Lily Diggs" and with divers other women whose names are unknown to Your Oratrix.

FOURTH, That Your Oratrix has never condoned said offense.

That there are no children born as a result of said marriage
Therefore YOUR ORATRIX PRAYS:

a-aA divorce a vinculo matrimonii from the respondent.

b-bSuch other and further relief as the case may require.

May it please Your Honor to grant unto Your Oratrix, an order of publication, setting forth the nature and substance of this bill and warning the said respondent to be in this Court in person or appear by solicitor on or before a certain day, to be therein named and show cause, if any he may have, why a decree should not be passed as prayed.

As in duty bound etc.

Maud Lee
Complainant.

C. H. Davis
Solicitor for Complainant.

State of Maryland)
) To Wit
Baltimore City)

I hereby certify that on this 10th day of Dec 1919, before me the subscriber, a Notary Public in and for the city of Baltimore, State of Maryland, personally appeared Maud Lee, the complainant in the foregoing bill and made oath in due form of law that the matter contained therein was true to the best of her knowledge and belief.

Carlos L. Jennings
Notary Public.

J. Steward Davis, Solicitor

118 E. Lexington St.

In The Circuit Court of Baltimore City.

Maud Lee Vs. William Lee.

ORDER OF PUBLICATION.

The object of this suit is to procure a decree for a divorce A Vinculo Matrimonii, by the plaintiff from the defendant.

The Bill states that the parties thereto were married in Baltimore City, State of Maryland on or about the 9th. day of March 1913 and lived together as man and wife until on or about November 15, 1917. That the plaintiff is a respondent of the city of Baltimore, state of Maryland and has been for more than two years prior to the filing of this bill of complaint. That the respondent is a non-resident of the city and when last heard of was in Philadelphia Pa. That though the conduct of the plaintiff towards her husband was always kind and affectionate and above reproach; he, without just cause or reason, abandoned her, to live in adultery with Lily Diggs. That the said William Lee has on divers days and times committed the crime of adultery with the afore mentioned "Lily Diggs" and with divers other women whose names are unknown to Your Oratrix. That there are no children born as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City, ordered this 17 day of ^{December} 1919. That the plaintiff by causing a copy of this order to be inserted in some daily newspaper, published in the city of Baltimore, once a week for four successive weeks, before the 7 day ^{January} 1920, and give notice to the said defendant, William Lee (now absent) of the object and substance of this Bill and warning him to be and appear in this Court in person or by Solicitor, on or before the 5 day ^{February} 1920 to show cause if any he may have, why a decree should not be passed as prayed.

James P. Foster