

3/17/20

In the Circuit Court
of 163
Baltimore City

Susie Rees 1920

vs

Leonard Rees

Dwight A. Jureles

Mr. Clerk Please file

(~~Edward~~ Jureles)

B 20774
(1)

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BALTIMORE, MD.

17 March 1920

Susie Lee

In The Circuit Court

vs.

of

Leonard Lee

Baltimore City.

To The Honorable, The Judge of Said Court:

Your Oratrix, complaining, respectfully states:

FIRST, That Your parties hereto, were married November 3rd. 1917 by Rev. Hayes, a methodist minister in Baltimore; and they lived together as man and wife until the first of September 1919.

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 also a resident of the city of Baltimore, state of Maryland.

THIRD, That though the conduct of your Oratrix toward her husband has always been kind, affectionate and above reproach; He without any just cause or reason abandoned her, that upon divers times and occasion he committed adultery with one Margaret Kriegler.

FOURTH, That Your Oratrix has never condoned nor forgiven the said desertion, that she has never co-habited with the said respondent since the said desertion.

FIFTH, That there is one minor child, Clarence, 14 months old born of the parties of this suit.

SIXTH, That Your Oratrix is without the means to defray the expenses of this litigation and that the defendant is employed, earning about \$30 per week, and she is advised by counsel that she is entitled to have an order passed by This Honorable Court, awarding her a certain sum as alimony during the progress of this suit, permanent alimony for the support of the aforesaid minor child, and a further sum to compensate her solicitor for his services in the cause.

WHEREFORE YOUR ORATRIX PRAYS:

a-That a decree be passed, divorcing Your Oratrix from the

respondent, a vinculo matrimonii.

b-Permanent for the support of herself and minor child.

c-Such other and further relief as the case may require, including alimony pendente lite and counsel fee in such sums as this Honorable Court may think proper. Awarding her a certain sum as alimony during the progress of this suit, permanent alimony

May it please Your Honor to grant unto Your Oratrix a writ of subpoena, directed unto said defendant, commanding him to be or appear in this Court on some day certain, to be named therein, to perform such decree as may be passed in the premises. As in duty bound etc.

Susie Lee
Complainant

(C. E. Davis)
Solicitor for Complainant.

State of Maryland)
) To Wit
City of Baltimore)

I hereby certify that on this day of 17th March 1920, before me the subscriber, a Notary Public in and for the County of Baltimore, state of Maryland aforesaid, personally appeared Susie Lee 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.

Arthur N. Rogers
Notary Public.



Wynnan Park Garage
Remington 29th St

35

113 Blee Ct. Ct.
1920 Docket No.

Lee
" Lee

1019 Arlington a

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. *B* 20774

(2)

Filed 24 March 1920

J. Steward Davis SOLICITOR

14

Summond and a copy of the process, left with the
defendants
Thomas M. Mc Nulty,
Sheriff

C. W. Houston 13/2/20

Fee \$0.50

EQUITY SUBPOENA

The State of Maryland

To

Lemard Lee

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said City, on the second Monday of *April* 1920, to answer the complaint of

Susie Lee

against you in said Court exhibited.

HEREOF fail not, as you will answer the contrary at your peril:

WITNESS, the honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *8* day of *March* 1920

Issued the *17* day of *March* in the year 1920

Clerk.

Notice to the person summoned:

Clas R Whiteford

"Personal attendance in Court on the day named in the above writ is not required; but unless within fifteen (15) days after the return day, legal defense is made in the above mentioned suit a Judgment by default may be entered against you."

60 B Docket 163
1920

CIRCUIT COURT

Lee

vs.

Lee

1019 Arlington Ave.

Order For Alimony

Pendente Lite

ORDER

B No.

20774
(B)

Fd: *18 March 1920*

14

*Copy of the within Order of Court, served on Leonard Lee,
on the 23rd day of March 1920, in presence of Henry S. Wharton,
Thomas H. MacFarlane,
Shuff.*

Fee \$0.50

Susie Lee

vs.

Leonard Lee
1019 Arlington Ave

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

March TERM, 1920

ORDERED BY THE COURT this 18th day of March 1920

that the defendant Leonard Lee

pay to the plaintiff Susie Lee

the sum of Ten

Dollars per week, during the continuance of this suit, accounting from the 18

day of March 1920 to the said plaintiff Susie Lee

as alimony, *pendente lite* unless cause to the contrary be shown on or before the 31

day of March 1920 provided a copy of this Order be served on the said defendant

Leonard Lee on or before the 24

day of March 1920

Robert F. Stumm

TRUE COPY—TEST:

CLERK