3/13/1/30

IN THE CIRCUIT COURT

6 20 B 444

BALT WORK CITY

1973

JOHN T.LINDSAY

VS.

MARY M.LINDSAY

BILL FOR DIVORCE

Mr.Clerk:-

Please file.

J. Steward Davis

DAVIS & BISHOP

BANNEYER BUILDING

COMMERCIAL PRINTING & STATIONERY C

JOHN T. LINDSAY

IN THE CIRCUIT COURT

VS.

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OF

MARY M.LINDSAY

BALTIMORE CITY

TO THE HONORABLE. THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

- (I) That he was married to his wife, Mary T. Lindsay, on or about the 6th day of July, 1915 and with whom he resided until on or about May 17th, 1916 when the defendant deserted the plaintiff.
- Mary M.Lindsay has always been kind, affectionate and above reproach, she has without any just cause or reason abandoned and deserted him and has declared her intentions to live with him 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 Orator has not lived or co-habited with said defendant since said desertion.
- (4) That there is one child, Sarah Elizabeth, age eleven years, born as issue of said marriage. The said infant is in the custody of Ellen Wilson, its maternal grandmother, in whose custody your Orator wishes it to remain.
- (5) That your Orator is a citizen of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this bill, but that the defendant is a non-resident of the State of Maryland.

TO THE END, THEREFORE:

- (a) That your Orator may be divorced a Vinculo Matrimonii from the said Mary M.Lindsay.
- (b) That the custody of the infant child, Sarah Elizabeth, be granted the said Ellen Wilson.
- (c) That he may have such other and further relief as his case may require.

May it please your Honor to grant unto your Orator the Order of Publication directed against the said Mary M.Lindsay, a non-resident of the State of Maryland, aforesaid, commanding and requiring her to be and appear in this Court 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.

Steward Sour SOLICITOR FOR COMPLAINANT.

JESTEWARD DAVIS, SOLICITOR, 215 ST. PAUL PLACE IN THE CIRCUIT COURT OF BALTIMORE CITY JOHN T.LINDSAY VS. MARY M.LINDSAY ORDER OF PUBLICATION

The object of this bill is to obtain a divorce a Vinculo Matrimonii by the plaintiff, John T.Lindsay, from the defendant, Mary M.Lindsay, also the custody of their infant child.

The bill recites that the parties were married on or about the 6th day of July, 1915 and lived together until May 17,1916, when the defendant deserted the plaintiff. That one child, Sarah Elizabeth Lindsay, eleven years of age, was born as result of said marriage. That the plaintiff is a resident of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this bill and that the defendant is a non-resident of the State of Maryland and is now residing in Chaster, Pennsylvania. That the defendant deserted the plaintiff May 17,1916, without cause or provocation; that the separation of the parties has continued uninterruptedly for more than three years, is deliberate and final, and beyond any hope of reconciliation.

It is thereupon ordered by the Circuit Court of Baltimore City, this // day of // 1923, that the plaintiff by causing a copy of this order to be inserted in some daily newspaper, published in Baltimore City, once a week for four successive weeks before the // day of // 1923, give notice to the said absent defendant. Mary M.Lindsay, warning her to be and appear in this Court, in person or by Solicitor, on or before // day of // 1923, and show cause, if any she may have, why a decree ought not be passed as prayed.

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