

IN THE CIRCUIT COURT

63 OF *B444*
BALTIMORE CITY

1923

JOHN T. LINDSAY

VS.

MARY M. LINDSAY

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

P25595

J. Steward Davis
SOLICITOR FOR PLAINTIFF.

(1)(2)

DAVIS & BISHOP
ATTORNEYS AT LAW
BANNEKER BUILDING
14 E. PLEASANT STREET
BALTIMORE, MD.

Ad 11 July 1923

3/13/130

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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.


SOLICITOR FOR COMPLAINANT.

J. STEWARD 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 Chester, 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 11 day of July 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 11 day of August 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 28 day of August 1923, and show cause, if any she may have, why a decree ought not be passed as prayed.

H. Arthur Lindsay