IN THE CIRCUIT COURT OF

GPB 716

CARRIE LONGAN 19 NO

VS.

SAMUEL LOATMAN

BILL FOR DIVORCE

Mr.Clerk:-

Please file.

B27774 Dovin Tovama

J. STEWARD DAVIS

ATTORNEY AT LAW

1 La Trimpse Min. 19

BAUMGARTEN & CO., INC.

IN THE CIRCUIT COURT

CARRIE LOTTMAN

VS.

OF

## SAMURL LOATMAN

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

- I. That she was married to her husband, Samuel Loatman, on or about the 15th day of October, 1912 and with whom she resided until about the 15th day of June, 1914 when the defendant deserted the plaintiff.
- That though the conduct of your Oratrix 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 the separation of the parties is beyond any reasonable expectation of reconciliation.
- That there is one child, age ten years as issue of said marriage.
- 4. That your Oratrix has not lived or co-habited with the said defendant since said desertion.
- 5. That your Oratrix 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 and when last heard of was in Cheswood, Delaware.

## TO THE END, THEREFORE:

- (a) That your Oratrix may be divorced a Vinculo Matrimonii from the said Samuel Loatman.
- (b) That she may resume her maiden name "Durham".
- (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 Order of Publication directed against the said Samuel Loatman a non-resident of the State of Maryland aforesaid, commanding and requiring him to be and appear in this Court on some day certain to be need therein to the premises and abide by and perform such decree or order as may be passed therein.

AND as in duty bound, etc.

SOLICITORS FOR COMPLAINANT.

Original

J.STEWARD DAVIS & GEORGE W. EVANS, SOLICITORS
215 ST.PAUL PLACE.

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IN THE CIRCUIT COURT OF BALTIMORE CITY.

## CARRIE LOATMAN VS. SAMUEL LOATMAN

## ORDER OF PUBLICATION

The object of this bill is to procure a divorce a Vinculo Matrimonii by the plaintiff from the defendant.

The bill recites that the parties were married on or about the 15th day of October, 1912 and lived together until about the 15th day of June, 1914, when the defendant deserted the plaintiff. That there is one child, age ten years, as issue of said marriage. That though the conduct of your Oratrix toward the said defendant has always been kind, affectionate and above reproach, he has, without any just cause or reason abandoned and deserted her and has deblared his intentions to live with her no longer and the separation of the parties is beyond any reasonable hope of reconciliation. That your Oratrix is a resident of the State of Maryland and has been for more than three years last past, but that the defendant is a non-resident of the State of Maryland and when last heard of was in Cheswood, Delaware.

It is thereupon this / day of Color 1924, ordered by the Circuit Court of Baltimore City that the plaintiff by causing a copy of this order to be published in Baltimore City once in each of four successive weeks, before the / day of What 1924, give notice to the absent defendant of the object and substance of this bill, warning him to be and appear in this Court in person or by solicitor, or or before the day of the show cause, if any he may have, why a decree

should not be passed as prayed.

as Ruthetord Clark

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