

3/13/20

IN THE CIRCUIT COURT OF
BALTIMORE CITY

64 B 362

1924

CHARLOTTA ALCOTT LUCAS

VS.

SAMUEL LUCAS

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

826872

J. Stupp Davis
George W. Lucas

ATTORNEYS FOR PLAINTIFF.

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE
BALTIMORE, MD.

A 21 Apr 1924
22 11 4

CHARLOTTA ALCOTT LUCAS : IN THE CIRCUIT COURT
VS. : OF
SAMUEL LUCAS : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, Samuel Lucas, on the 17th day of January, 1921 and with whom she resided until the 10th day of February, 1922 when the defendant deserted the plaintiff.
2. That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said Samuel Lucas.
3. That the said Samuel Lucas has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned women, whose names to your Oratrix are unknown. That said offense has not been condoned by your Oratrix.
4. That there are no children as issue of said marriage.
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 Washington, D.C.

TO THE END, THEREFORE:

- (a) That your Oratrix may be divorced a Vinculo Matrimonii from the said Samuel Lucas.
- (b) That she may resume her maiden name, GRANT.
- (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 Lucas, 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 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 Davis

George Evans

SOLICITORS FOR COMPLAINANT.

J. STEWARD DAVIS & GEORGE W. EMANS, SOLICITORS

215/ ST. PAUL PLACE

IN THE CIRCUIT COURT OF BALTIMORE CITY.

CHARLOTTE ALCOTT LUCAS

VS.

SAMUEL LUCAS

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

The bill states that the parties were married on the 17th day of January, 1921 and lived together until Feb. 10, 1922 when the defendant deserted the plaintiff. That there are no children as issue of said marriage. That the defendant has on divers days and times since said marriage committed the crime of adultery with divers, lewd and abandoned women and said offense has not been condoned by your Oratrix. That your Oratrix is a resident of Baltimore City, State of Maryland and has been for more than three years past passed but that the defendant is a non-resident and when last heard of was in Washington, D.C.

It is thereupon this 22 day of *April* 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 22 day of *May* 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, on or before the 7 day of *June* 1924 to show cause, if any he may have, why a decree should not be passed as prayed.

Arthur J. Stein

IN THE CIRCUIT COURT
OF
BALTIMORE CITY.

64 B 2672
CHARLOTTA ALCOTT LUCAS

VS.

SAMUEL LUCAS.

A N S W E R .

B 26872

(3)

Ad. 7 June 1924

CHARLOTTA ALCOTT LUCAS : IN THE CIRCUIT COURT
 VS. : of
SAMUEL LUCAS. : Baltimore city.

A N S W E R .

For answer to plaintiffs bill of complaint,-

(1) The defendant admits so much of the allegations of paragraph one (1) of the plaintiff's bill as relates to the date of their marriage and their living together, but denies every other allegation therein.

2() The defendant denies every all and evcry allegation in paragraph (2) of the plaintiff's bill and for answer alleges that the plaintiff deserted and abandoned him on or about June 1,1922, without any just cause whatever .

(3) The defendant denies all and every allegation contained in paragraph three(3) of plaintiff's bill of complaint, but alleges that the plaintiff' has on divers days and times since said marriage committed the crime of adultery with divers indecent and immoral men, whose names to the defendant are unknown . The said offense of adultery has not been condoned by the defendant.

(4) The defendant admits all of paragraph four (4) of plaintiff's bill.

(5) The defendant denies every allegation of paragraph five (5) of plaintiff's bill which states that she is a citizen of the State of Maryland , and specifically denies that the plaintiff has resided in the City of Baltimore for three years prior to the filing of this bill. The defendant admits that he is a non-resident of the State of Maryland and is a resident of the District of Columbia. The defendant further alleges that he resided in the District of Columbia and lived with the plaintiff as husband and wife , untill the plaintiff voluntarily deserted and abandoned him on or about June 1, 1922.

WHEREFORE , THE DEFENDANT PRAYS:

(a) That the bill of the plaintiff be dismissed .

(2) That an order issue from the Honorable Court requiring the plaintiff to pay all the cost of this suit and a reasonable Attorney's fee.

Joseph A. Barton
1029 - 21 - 27th St.
Washington, D.C.
SOLICITORS FOR DEFENDANT.