

B633
610
IN THE CIRCUIT COURT OF
1925
BALTIMORE CITY.

MARY PAYNE

VS.

LAWRENCE PAYNE

BILL FOR DIVORCE

B-29432

Mr. Clerk:-

Please file.

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Davis Evans

ATTORNEYS FOR PLAINTIFF

Davis Evans

ATTORNEY AT LAW
215 SAINT PAUL PLACE
BALTIMORE, MD.

Ad 10 August 1925

MARY PAYNE : IN THE CIRCUIT COURT
VS. : OF
LAWRENCE PAYNE : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, Lawrence Payne on or about the 15th day of October 1918 and with whom she resided until about the 15th day of June, 1922 when the defendant deserted the plaintiff.
2. That though the conduct of your Oratrix toward the said Lawrence Payne 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 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 Oratrix has not lived or co-habited with the said defendant since said desertion.
4. That there are two children born as issue of said marriage, Earl, age seven years and Julia age eight years, for whom the plaintiff asks the custody.
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 of complaint but that the defendant is a non-resident of the State of Maryland and when last heard of was in Philadelphia, Pennsylvania.

TO THE END, THEREFORE:

(a) That your Oratrix may be divorced a Vinculo Matrimonii from the said Lawrence Payne.

(b) That she may have the custody of her two children, Earl and Julia.

(b) 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 Lawrence Payne, 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.

Davis Evans

ATTORNEYS FOR PLAINTIFF.

DAVIS & EVANS, SOLICITORS

"215 ST. PAUL PLACE

IN THE CIRCUIT COURT OF BALTIMORE CITY.

MARY PAYNE VS. LAWRENCE PAYNE

Original
19633
1925

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 15, day of October 1918 and lived together until about the 15th day of June, 1922 when the defendant deserted the plaintiff. That there are two children born as issue of said marriage, Earl age, seven and Julia, age eight years. 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 declared his intentions to live with her no longer and the separation of the parties is beyond any reasonable expectation of reconciliation, that such abandonment has continued uninterrruptedly for more than three years prior to the filing of this Bill of Complaint. That your Oratrix is a citizen of the State of Maryland but that the defendant is a non-resident of the State of Maryland and when last heard of was in Philadelphia, Pennsylvania.

It is thereupon this 12 day of August 1925, 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 14 day of Sept 1925 give notice to the absent defendant, Lawrence Payne, 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 30 day of Sept 1925 to show cause, if any he may have, why a decree should not be passed as prayed.

True copy Test
14. Arthur Stimpf
Clas R Whiteford Clerk
an 13, 20, 27 03