

In The Court of
No. 686
Baltimore City 1920

Wm Pennington

vs

Edna Pennington

~~Wm Pennington~~ please file
Bill for divorce & alimony

Wm Pennington please file

(Signature)

B21790

(11)

DAVIS & BISHOP
ATTORNEYS AT LAW
118 E. LEXINGTON STREET
BALTIMORE, MD.

Ad 8 Nov 1920

William E. Pembleton : In The Circuit Court
: of
vs. :
Edna Pembleton : Baltimore City.

To The Honorable, The Judge of Said Court:

Your Orator complaining, respectfully says:

FIRST, that the parties hereto were married on or about March 12, 1912 by Rev. Neal of Baltimore City Maryland., and lived together as man and wife until on or about March 15th 1913. Said marriage occurred in Baltimore City, State of Maryland.

SECOND, That both parties are residents of the city of Baltimore, state of Maryland, and have been for more than two years prior to the filing of this bill of complaint.

THIRD, That though the conduct of your Orator toward his wife has always been kind, affectionate and above reproach, she without any just cause or reason abandoned and deserted him and has declared her intentions to live with him no longer; that such abandonment has continued uninterruptedly for more than three years prior to the filing of this bill of complaint and was deliberate and final, and beyond any reasonable hope or expectation of reconciliation.

FOURTH, That your orator has never condoned nor forgiven the said desertion, that he has never co-habited with the said respondent since the desertion.

FIFTH, That there is one child born as a result of their marriage, Ada seven (7) years old.

THEREFORE YOUR ORATOR PRAYS:

a-a A divorce a vinculo matrimonii from the respondent.


b-b Such other and further relief as the case may require.

May it please Your Honor to grant unto Your Orator a Writ of Subpoena, directed unto the said respondent, commanding her to be or appear in this Court on some day certain to be named therein, to perform such decree as may be passed in the premises.

As in duty bound etc.



Complainant



Solicitors For Complainant.

376
686
192 *o* *Stev* Ct. Ct. Docket No.

Pemberton

"
Pemberton 11/13/20

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pat
No. *B* 21790

(2)

Filed 17 Nov 1920

J S Davis SOLICITOR

3

Summoned, and a copy of the Process left with the defendant.

Thomas J. M. Multy
Sheriff

(Pemberton) 11/13/20 Fees \$0.80

EQUITY SUBPOENA

The State of Maryland

To

Edna Pemberton

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said City, on the second Monday of *December* 1920, to answer the complaint of

William E. Pemberton

against you in said Court exhibited.

HEREOF fail not, as you will answer the contrary at your peril:

WITNESS, the honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *8th* day of *November* 1920

Issued the *J*, day of *November* in the year 1920

Chas. R. Whiteford Clerk.

Notice to the person summoned:

"Personal attendance in Court on the day named in the above writ is not required; but unless within fifteen (15) days after the return day, legal defense is made in the above mentioned suit a Judgment by default may be entered against you."

3/12/14/11

IN THE CIRCUIT COURT
OF
BALTIMORE

CITY *73686*
1920

William E. Pembleton
630 Sterling St.

vs.

Edna Pembleton.

PETITION FOR ALIMONY
AND COUNSEL FEE.

Mr. Clerk:--

B 20790
Please file &c.,

(3)
Roy S. Bond
Sol. for Plaintiff.

ROY S. BOND
ATTORNEY AT LAW
215 ST. PAUL PLACE
BALTIMORE, MD.

FILED *Do Nov 1920*

William E. Pembleton

vs.

Edna Pembleton

IN THE CIRCUIT COURT
OF
BALTIMORE CITY.

TO ~~THE HONORABLE, THE JUDGE OF SAID COURT:~~

Your Respondent in her Petition for Alimony and Counsel fee respectfully represents as follows:

FIRST: That heretofore her husband filed his Bill of Complaint in this Court, charging that your Petitioner had abandoned and deserted him and thereupon prayed that he might be divorced, A Vinculo Matrimonii.

SECOND: That your Petitioner has answered said bill emphatically denying material allegations therein.

THIRD: That her husband, William E. Pembleton is employed as a Porter, and she is informed and verily believes that he is earning a regular wage of at least Twenty Five(\$25) Dollars per week; while your Petitioner except from the small sum she is able to earn as a result of her own labor is destitute of means of supporting herself and Seven year old child, Ada Pembleton during the pendency of this suit and until their child has reached her maturity or of defraying the costs and expenses of this suit.

WHEREFORE YOUR RESPONDENT PRAYS:

- a- That an order be passed authorizing and directing the said William E. Pembleton to pay your Petitioner, a reasonable sum for her support and the support of her child, Ada Pembleton and to pay to her Counsellor a reasonable sum as a fee.
- b- Permanent alimony for the support of the child heretofore mentioned in these proceedings.
- c- Such other and further relief as the case may require.

As in duty bound, she will ever pray,

Edna Pemberton
.....
Defendant.

R. M. Bond
.....
Sol. for Plaintiff.

State of Maryland
Baltimore City -to wit-

I hereby certify that on this *16th* day
of November 1920, before me the subscriber, a Notary
Public, of the State of Maryland, in and for Baltimore
City, personally appeared *Edna Pemberton*
the defendant, in the foregoing proceedings, and made
oath in due form of law, that the matter contained in
this her answer, is true to the best of her knowledge
and belief.

As witness my hand and Notarial Seal.

Cleanora S. Wright
.....
NOTARY PUBLIC.

A. Bronka Son
327 W. Balt. St
Docket 686
1920

Circuit Court

Pembleton

vs.

Pembleton

630 Sterling St

Order Counsel Fee and Alimony

Pendente Lite

327 W. Balt. St

B. No. 21790

\$250
for S. Bond
included

fd 2 Nov 1920
3

Copy of the within Order of Court served on
William E. Pembleton on the 30th day of November
1920, in presence of Peter E. Ring,

Thomas J. M. Gentry
Sheriff

Fee \$0.50

William E Pemberton

-IN THE-
CIRCUIT COURT

-OF-

BALTIMORE CITY

Edna Pemberton

11/30/20
[unclear]

November TERM 1920

ORDERED BY THE COURT this 22nd day of November 1920

that the Plaintiff William E Pemberton

pay to the Defendant Edna Pemberton

the sum of twenty-five Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of ten

Dollars per week, during the continuance of this suit, to the said Defendant Edna Pemberton

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 10

day of December 1920, provided a copy of this Order be served on the said Plaintiff

William E Pemberton on or before the 3

day of December 1920

Robert J. [unclear]

TRUE COPY—TEST:

CLERK

IN THE CIRCUIT COURT

NO. ²
BALTIMORE

CITY

686

B
1920

William E. Pembleton

vs.

Edna Pembleton.

-ANSWER-

Mr. Clerk:--

B 21790

Please file &c.,

Roy S. Bond
Sol. for Defendant.

ROY S. BOND
ATTORNEY AT LAW
215 ST. PAUL PLACE
BALTIMORE, MD.

FILED

27 Nov 1920

William E. Pembleton

vs.

IN THE CIRCUIT COURT
NO. 2
BALTIMORE CITY.

Edna Pembleton

TO THE HONORABLE, THE JUDGE OF SAID COURT:

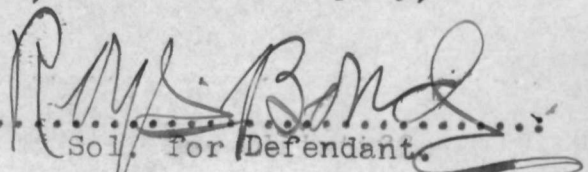
Your Respondent in answer to the Bill before this Court exhibited respectfully shows:

FIRST: She admits the first, second, and fifth paragraphs of the Plaintiff's Bill.

SECOND: She emphatically denies that the conduct of the Plaintiff towards her was kind, affectionate and above reproach, and to the contrary says, that her husband was insanely jealous, cruel, and unfaithful to her and that he did not provide for her in keeping with her station in life. She denies that she left him and to the contrary says, he left her. She further denies any allegations in the Plaintiff's bill, as set forth in each and every paragraph that may be used against her and demands strict and legal proof of same.

Having answered all the material allegations of the Plaintiff's Bill, she respectfully prays that the same be dismissed with proper costs.

As in duty bound, she will ever pray,


.....
Sol. for Defendant.