

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

65 JB 173
FLORENCE PETTIGREW
1925

VS.

AVERY PETTIGREW

Baltimore City Jail

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF.

B28519

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

March 1925

FLORENCE PETTIGREW : IN THE CIRCUIT COURT
VS. : OF
AVERY PETTIGREW : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:-

1. That she was married to her husband, Avery Pettigrew, on the 11th day of June, 1923 and with whom she resided until the 28th day of February, 1925, 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 Avery Pettigrew.
3. That the said Avery Pettigrew has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned women in Baltimore City, whose names to your Oratrix are unknown, and said offense has not been condoned by your Oratrix.
4. That your Oratrix has not lived or co-habited with the said defendant since she discovered his said adulteries.
5. That there are no children born as issue of said marriage.
6. That both your Oratrix and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this bill.
7. Your Oratrix further states that she is without means to defray the expenses of this suit and avers that the defendant is employed and is making about twenty-five dollars per week. She is advised by Counsel that she may petition this Honorable Court that the defendant be required to pay her a reasonable amount

as counsel fee and amount sufficient to support herself during the pendency of this suit.

TO THE END, THEREFORE:

- (a) That your Oratrix may be divorced A Vinculo Matrimonii from the said Avery Pettigrew.
- (b) Alimony pendente lite.
- (c) That she may resume her maiden name "BELL".
- (d) 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 Writ of Subpoena directed to the said Avery Pettigrew, 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.

Blevins + Evans

ATTORNEYS FOR PLAINTIFF.

P599

Ct. Ct.

173
1925- B Docket No. 65

Pettigrew
- vs -

Pettigrew
Baltimore City Jail

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. ^{PW} B-28519

Filed ^{F2} J Mich 192

J Steward Harris SOLICITOR

4

Summoned and a copy
of the process left with the
defendant John E. Fotee
Sherriff
3/17/25

New \$0.80

3/13/25/24

THE STATE OF MARYLAND
COUNTY SUBPOENA

EQUITY SUBPOENA

The State of Maryland

To

Mary Pettigrew

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you do within the time limited by law beginning on the second Monday of *March* next cause an appearance to be entered for you and your answer to be filed to the complaint of

Florence Pettigrew

against you exhibited in the Circuit Court of Baltimore City,

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

WITNESS, the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the *15th* day of *January* 192*5*

Issued the *5th* day of *March*, in the year 192*5*

Chas R. M. [Signature] Clerk

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.