

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

B 398

ANNABELLE POLLARD

VS.

MAJOR B. POLLARD

707 Eastern Place

BILL FOR DIVORCE.

Mr. Clerk:-

Please file.

Davis & Edging
ATTORNEYS FOR PLAINTIFF

B27/35

J. STEWARD DAVIS

ATTORNEY AT LAW

275 SAINT PAUL PLACE

BALTIMORE, MD.

18 June 1924

ANNABELLE POLLARD : IN THE CIRCUIT COURT
VS. : OF
MAJOR B.POLLARD : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

- I. That she was married to her husband, Major B. Pollard on the 13th day of December, 1911, in Philadelphia, Pennsylvania, and with whom she resided in Baltimore City, until the 11th day of June, 1924.
2. That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife towards the said Major B. Pollard.
3. That the said Major B. Pollard has committed the crime of adultery with divers, lewd and abandoned women in Baltimore City, and that said offense has not been condoned by your Oratrix.
4. That there is one child, Major B. Pollard, Jr. age three and a half years, born as issue of said marriage.
5. 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 of Complaint.
6. Your Oratrix further states that she is destitute and without funds to defray the expenses of this litigation; further that she is without means of support for herself and child. She is advised by counsel that she is permitted to petition this Honorable Court that the defendant shall be compelled to contribute a reasonable amount as alimony pendente lite towards the support of your Oratrix, and that she will also be awarded an amount in order to compensate her Solicitor.

Your defendant is employed and earns an average of one hundred dollars per month.

TO THE END, THEREFORE:

- (a) That your Oratrix may be divorced a vinculo matrimonii from the said Major B. Pollard.
- (b) That this Honorable Court may decree that the defendant pay a reasonable sum as alimony pendente lite and an additional sum as counsel fee.
- (c) Permanent alimony.
- (d) Right to resume her maiden name WILLIS.
- (e) 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 Subpnaena directed against the said Major B. Pollard 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.


SOLICITORS FOR COMPLAINANT.

P-247

398

Ct. Ct. ~~No 2~~

1924

Docket No.

Dollard

vs.

Dollard
Hamburger

1207 Eutan Place

Subpoena to Answer Bill of Complaint

Pr
B27 135

No.

(2)

Filed 30 June, 1924

Dans H. Evans

Solicitor.

1207 Eutan P
11

Summoned and a copy of the process left with the defendant

(Bichy)
(6/23/24)

Fees \$0.80

John E. Potee
Sheriff

EQUITY SUBPOENA
The State of Maryland

To

Major B. Pollard / 707, Eutaw Place

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 July, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of Annabelle Pollard,

against you exhibited in the CIRCUIT COURT ~~xxx~~ 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 12th day of May, 192 4

Issued the 18th day of June, in the year 1924,

Chas R. Whiteford
Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. ~~15~~ ²⁰⁶, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

64 B Docket 398

1924

CIRCUIT COURT.

Salad

Pollard

1207 Gilman Place

Order for Alimony

Pendente Lite

ORDER

B No.

24135
(3)

\$250 per
child

Fd.:

20 June 1924

17

Copies of the within Order of Court served on
Major P. Pollard on the 23rd day of June 1924 in
presence of august Buchy

Wsd 0.50

John C. Potter

Sheriff

Annabelle Pollard

vs.

Major B Pollard

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

May TERM, 1924

ORDERED BY THE COURT this 20 day of June 1924

that the defendant Major B Pollard
pay to the plaintiff Annabelle Pollard
the sum of Ten

Dollars per week, during the continuance of this suit, accounting from the 20 day of June 1924 to the said plaintiff Annabelle Pollard

as alimony *pendente lite* unless cause to the contrary be shown on or before the 5 day of July 1924 provided a copy of this Order be served on the said defendant

Major B Pollard on or before the 28 day of June 1924
Wm. F. Stoen

TRUE COPY—TEST:

CLERK

21

Warrs &
Evans

398 B64 Ct. Ct.
1924 No. Docket

Pollard

vs.
Pollard

MOTION FOR HEARING

B 27135

No.

(3)

Roy S Bond

Filed 10 day of July 1924

398.

Annabelle Pallas

vs.

Major Pallas

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The *Plaintiff* by *Davis + Evans*

Solicitor, applies to have the above entitled cause placed on the Trial Calendar
for hearing *in absentia pendente lite*

in conformity with the First Equity Rule.

Solicitor for *Complainant*

Circuit Court

398 64
19 24 B No. Docket

Annabelle Pollard

vs.

Mary Pollard

Final Order, Counsel Fee and Alimony
Pendente Lite.

~~D~~ 27135

No. 6 B

Filed 15 July 19 24

Annabelle Pollard

vs.

Major Pollard

IN THE
Circuit Court
OF
BALTIMORE CITY.

Term, 19

This cause coming on to be heard upon the petition for Alimony **pendente lite** and Counsel fee, and the answer thereto, and testimony taken, and having been submitted by the solicitors for the respective parties;

Ordered by the Circuit Court of Baltimore City this 15th day

of July 1924, that the defendant

pay to the plaintiff

the sum of _____ Dollars, as counsel fee

for the Solicitor of the _____ and that he

further pay the sum of Five _____ Dollars per week,

to the said plaintiff.

as Alimony **pendente lite** accounting from the 15th day of July 1924

and continuing until the _____ day of _____ 19____, (should this suit be

so long pending) or until the further order of this Court.

Raymond Thom Parsons and Associates
James P. Gorter

3/13/1/78

In The
-Circuit Court, No. 1-
Baltimore, Md.

B 398
1924

ANNABELLE POLLARD

VS.

-MAJOR B. POLLARD-

- Answer.-

B 27135
Mr. Clerk:--

[4]
Please file &c.
R. M. Bond
Sol. for Defendant.

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

FILED 28 June 1924

ANNABELLE POLLARD

IN THE

VS.

-CIRCUIT COURT NO. 1-

BALTIMORE CITY.

MAJOR B. POLLARD

Your Respondent, Major B. Pollard, in answer to Bill of Complaint and the Petition for alimony and Counsel fee respectfully shows:

- FIRST: That he admits the allegations contained in paragraph ONE.
- SECOND: He emphatically denies the allegations contained in paragraph TWO.
- THIRD: That he indignantly denies paragraph THREE, and to the contrary says, that he always *has* been a good, kind, affectionate husband to his wife.
- FOURTH: That he admits the allegations contained in paragraph FOUR.
- FIFTH: That he admits the allegations contained in paragraph FIVE.
- SIXTH: That he denies the allegations contained in paragraph SIXTH, but is willing to support his child in keeping with his moderate means. He expressly denies that he earns One Hundred (\$100) dollars, per month, or anything near that amount.

Having answered in so far as he is advised is necessary, he respectfully prays that the bill of divorce and petition for alimony be dismissed, and the order thereon vacated.

As in duty bound etc.,


Sol. for Respondent.

Major B. Pollard.

Defendant.

STATE OF MARYLAND
BALTIMORE CITY - to wit-

I hereby certify that on this ^{24th} day
of June, 1924, before me the subscriber, a Notary Pub-
lic of the State of Maryland, in and for Baltimore City,
personally appeared *Major B. Pollard*,
defendant, in the above proceedings, and made oath in due
form of law, that the matter and facts set forth in this
his answer is true to the best of his knowledge and be-
lief.

As witness my hand and Notarial Seal.

Eleanora S. Wright

-NOTARY PUBLIC-