

In the $B \frac{81}{1917}$
Circuit Court ~~No. 2~~
of Baltimore City

Julia Price

vs

Jacob Price

Bill for divorce a vinculo
matrimonii

Mr Clerk:-

Please file etc.

J. Louis Shocket

Sol for Plaintiff.

B 16288

L 12

bd 27 July 1917

Julia Price
vs
Jacob Price

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)

IN THE
CIRCUIT COURT
OF BALTIMORE CITY.

TO THE HONORABLE THE JUDGE OF SAID COURT:-

Your Oratrix complaining,
respectfully represents unto Your Honor:-

1st. That Your Oratrix was united in Marriage to the Defendant Jacob Price, on the 3rd. day of October, 1917, in Baltimore City, State of Maryland, by the Rev. Simon Williamson.

2nd. That she is a resident of the City of Baltimore, State of Maryland and has been for more than two years preceding the filing of this Bill of Complaint.

3rd. That ever since the said marriage the Defendant has treated the Plaintiff cruelly, harshly and with great brutality; and that he has not contributed towards her support since the latter part of December, 1916.

4th. That the Defendant Jacob Price has been guilty of the act of adultery with certain women, whose names are unknown to Your Oratrix, and one of whom resides in Annapolis, State of Maryland; and that the Defendant has stayed away from his home and gone to Annapolis with the purpose of committing adultery on a great number of occasions; and that Your Oratrix has not cohabited with the Defendant since she discovered that he was guilty of adultery, nor has she in any way condoned his said offenses.

5th. That Your Oratrix has at all times conducted herself as a chaste, affectionate and kind wife should towards the Defendant Jacob Price and that her conduct towards him has at all times been above reproach.

6th. That the Defendant is and has been steadily employed and earns not less than seventeen dollars weekly, and to Your

Oratrix is wholly destitute of any means of support for herself during the pendency of this suit, except from her own labor, or of defraying the costs and expenses attending the prosecution of this suit.

TO THE END THEREFORE:

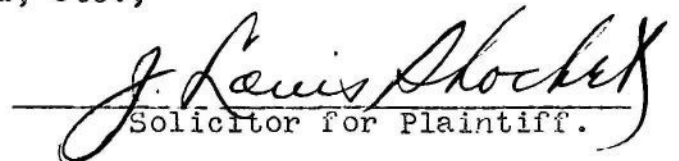
(a) That Your Oratrix may be divorced a ~~matrimonii~~ vinculo matrimonii from the Defendant.

(b) That in the meantime the said Defendant Jacob Price may be required to pay unto Your Oratrix a reasonable sum of money for the support of herself, and pay unto her counsel a reasonable counsel fee.

(c) And for such other and further relief as this Honorable Court may think meet and proper in the premises.

May it please Your Honor to grant unto Your Oratrix the writ of subpoena directed unto the Defendant Jacob Price residing at No. 1210 North Spring street, Baltimore City, commanding him to be and appear in this Court, in person or by solicitor on some certain day to be named therein, and answer the premises and abide by and perform any decree that may be passed therein.

And as in duty bound, etc.,


Solicitor for Plaintiff.

State of Maryland, City of Baltimore, Sct:-

This is to certify that on this 23rd. day of February, 1917, personally appeared before me the subscriber, a Notary Public in and for Baltimore City and State aforesaid, Julia Price who made oath in due form of law that the matters and facts stated in the foregoing Bill of Complaint are true to the best of her knowledge and belief.

As witness my hand and Notarial seal.


Notary Public.

362

81 Ct. Ct.
1917 B Docket. No.

Julia Price
vs

Jacob Price

1210 N Spring

Subpoena to Answer Bill of Complaint.

No. 16288
(2)

Filed 8 March 1917

J Louis Shocket
SOLICITOR.

5

Summed and a copy of the Process left with
The defendant

(McDonough)

Fee \$0.50

Thomas P. M. Gully
Sheriff

EQUITY SUBPOENA

The State of Maryland,

To

Jacob Price

1210 N. Spring St

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 March 1917 to answer the complaint of Julia Price

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 Jan 1917 issued the 27 day of July in the year 1917

W. 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 such number of days thereafter as the law limits, legal defense is made in the above mentioned suit a Judgment by default may be entered against you.”

Employed by
Griffith & Boyce
4 Ave & Clinton St

57 B Docket 81
1917

CIRCUIT COURT.

Julia Price

Jacob Price

Order For Alimony

Pendente Lite.

ORDER

B No. 16288
(B)

\$17.00 per week
no children

Fd.: 27 July 1917

copy of the within Order of Court served
on Jacob Price on the 5th day of
March 1917, in presence of Edward P.
McDonough

Thomas F. M. Kelly
Sheriff

Fee \$0.50

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

Julia Price

v.s.

Jacob Price

January TERM, 1917

ORDERED BY THE COURT this *27* day of *February* 1917

that the defendant *Jacob Price*
pay to the plaintiff *Julia Price*
the sum of *four*

Dollars per week, during the continuance of this suit, accounting from the *27*
day of *February* 1917 to the said plaintiff *Julia Price*
as Alimony, *pendente lite* unless cause to the contrary be shown on or before the *14*
day of *March* 1917, provided a copy of this Order be served on the said defendant
Jacob Price on or before the *7th*
day of *March* 1917.

W Arthur Stump

TRUE COPY—TEST:

CLERK.

3/12/45

Julia Price
vs
Jacob Price

1381
1947

Print Court

for

Eastern

City

Answer of Defendant.

Will please
file -

B 16288

(4)

J. STEWARD DAVIS
ATTORNEY AT LAW
COURTLAND BUILDING
215-217 COURTLAND ST.

3/12/45

The answer of Jacob Price the defendant in this cause to the order of said court passed on the 27th day of Feb., 1917 requiring the defendant to show cause why he should not pay \$4 a week as alimony pendente lite:

The defendant answering says.

- (1) That he has answered fully the bill to this cause against him exhibited.
- (2) That this defendant denies his ability to pay alimony at the rate of \$4 per week because he does not have a sufficient income from which to pay the same.
- (3) That the defendant has no means of support except that made by his manual labor at a very dangerous task viz: attending to the cinders in the acid department of a fertilizer plant, thus making it impossible to work an ordinary day or a full week and especially because of his physical condition which necessitates his seeking hospital treatment at rather frequent intervals and he further avers that the plaintiff is able to work and does work, having an income much larger than his.
- (4) That the plaintiff before marrying the defendant was keeping house where she now resides and where they both resided during the time that they lived together, and that it was only upon the emphatic insistence of the defendant that the defendant left the house of the plaintiff and that he was at all times ready and willing to contribute to the support of the plaintiff to the best of his ability and it was only because of her refusal to accept the money offered her by the defendant that the defendant discontinued the support

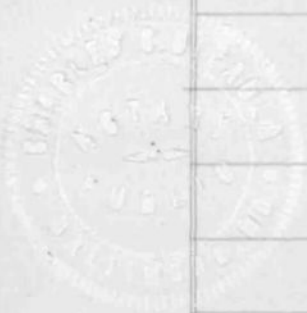
(C. J. Davis)
Sergeant for defendant
Jacob Price

STATE OF MARYLAND, BALTIMORE CITY, to wit:

I HEREBY CERTIFY that on this 18th day of
February 1917 before me the subscriber a NOTARY PUBLIC
of the said State in and for the City aforesaid
personally appeared Jacob Price and made oath in due
form of law, that the matters and facts contained in
the foregoing answer to the bill for divorce and the
petition for alimony pendente lite are true to the
best of his knowledge and belief

Charles C. Dipaula

NOTARY PUBLIC



J. Louis Shodet

81357 Ct. Ct.
1917 No. Docket.

Julia Price

vs.
Jacob Price

MOTION FOR HEARING

B

16288
No.

5

J. Steward Davis
215 Boulevard

Filed 14 day of March 1917

Julia Price

VS.

Jacob Price

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY

The *Plaintiff* by *J. Louis Shocket*
her Solicitor applies to have the above entitled cause placed on the Trial

Calendar for hearing *an Alimony order and answer*
thereto

in conformity with the First Equity Rule.

J. Louis Shocket
Solicitor for *Plaintiff*

Serve upon

J. Steward Davis
Col.

215 Courtland St.

81 B. Ct. Ct.
1917 No. 57 Docket.

Julia Price

vs.

Jacob Price.

NOTICE FOR HEARING.

No. B 16288
(6)

No.

Filed 14 day of March 1907

3

Copy of the within Notice served on J. Steward Davis
Solicitor on the 19th day of March 1917, in the presence
of Morris Imbelstein

Filed 8050

Thomas F. McHulley
Sheriff

Julia Price

vs

Jacob Price

IN THE
CIRCUIT COURT
OF BALTIMORE CITY

Upon application made by the Solicitor for the Plaintiff

*the above entitled cause has been placed upon the Trial Calendar in
accordance with the provisions of the First Equity Rule, and the same will
stand for hearing on* Alimony order and answer thereto,

when reached in due course on the said calendar.

True copy,

Test:

CHARLES R. WHITEFORD,

Clerk Circuit Court.

Clerk.

81
1917 B. 67 Ct. Ct.
Docket

Price

vs.
Price

Summons for Witnesses

B 16288
No. (7)

Filed 7 day of April 1917

In the Circuit Court of Baltimore City

Term, 19

The Sheriff will please summon the following witnesses,

returnable Monday April 9. 1917 at 10 A. M.

3 - The said Griffith & Boyd Company, ^{90 Gay Street,} a corporation, to produce all records of the said Company showing the wages, or earnings of one Jacob Price employed by them at their factory at 4th. and Clinton streets, Highlandtown, Baltimore County, Maryland, from the date of his employment to date.

to testify for

Plaintiff

in the case of

Julia Price

vs.

Jacob Price

Clas R Whiteford

Circuit Court ⁶⁷ B. ⁸⁷ 1917

Juba Price

vs.

Jacob Price

Final Order, Counsel Fee and Alimony

Pendente Lite

B
No. 16288 B
{8}

Filed 9 April 1917.

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

Julia Price
vs.

Jacob Price

January Term, 1917

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~~ ^{upon agreement of the parties hereto} ~~solicitors for the respective parties;~~

ORDERED by the Circuit Court of Baltimore City this ninth day
of April 1917, that the defendant, Jacob
Price pay to the Plaintiff Julia
Price the sum of Three ~~Dollars, as counsel fee~~

~~for the Solicitor of the~~ and that he

~~further~~ pay the sum of Three Dollars per week,

to the said Julia Price

as Alimony *pendente lite* accounting from the 27th day of February 1917

and continuing until the _____ day of _____ 191 (should this suit be
so long pending) or until the further order of this Court

H. Arthur Stump

Serve on

Jacob Rice
to Guffell + Boyd
Clinton ave + ave
Baltimore

Ct. Ct. B 57 B 81
191 7

Julia Rice

vs.

Jacob Rice & wife

copy of order of court
left April 24/1917

ORDER OF COURT

B 16288

No. (9) B.

Filed Heapul 191 7

Received Apr 17 1917 at
3:30 am forthwith delivered to
Sheriff of Baltimore County
William P. Cole, Clerk

To Miss Order of Court made known to Jacob Rice by reading
same to him and copy of same left with him this 24th day of
April 1917.
Lawrence M. Mable
Clerk

Julia Price
vs.
Jacob Price

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

Ordered by the Circuit Court of Baltimore City this.. 16th..... day of... April..... 1917
that the Jacob Price, ~~Defendant~~ appear before this Court in person,
on the... 30th day of... April....., 1917 at 10 o'clock A. M., and then and there show cause,
if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying
the Order of this Court passed on the 9..... day of..... April....., 1917, directing the
payment of Alimony, pendente lite, by him to the... Plaintiff Julia Price....
provided a copy of this Order be served on the said... Defendant Jacob Price....
on or before the 25..... day of..... April....., 1917

H Arthur Stamp

Circuit Court

B. ⁸¹
1917

Price

vs.

Price

Final Order, Counsel Fee and Alimony

Pendente Lite

No. 16288 B
(10)

Filed 30 April 1917

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

Julia Price
vs.

Jacob Price

for Term, 1917

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 Thursdelt day of May 1917, that the defendant Jacob Price pay to the plaintiff, Julia Price the sum of _____ Dollars, as counsel fee

for the Solicitor of the _____ and that he

further pay the sum of two hundred Dollars per week, to the said, Julia Price

as Alimony *pendente lite* accounting from the 30th day of May 1917 and continuing until the _____ day of _____ 1917 (should this suit be ~~so long pending~~) or until the further order of this Court.

N. Arthur Plumb

No 625

Cir. Ct.

81 B 507
1907

D. No.

Julia Price
vs.

Jacob Price

Attachment in Equity.

B 16288

No.

(11)

Filed ²¹ day of ⁵ May 1907

WM. J. C. DULANY COMPANY, BALTIMORE.

Attached

Thomas St. W. Smith

Shuff

1.50 Shuff

1.00 Cash

2.50 per 5/23/17

M

Release with cost

Arthur J. Smith

May 23, 1917

1212 n. Spring St
after 6 P.M.

Sept 1911 B

(ATTACHMENT IN EQUITY.)

MARYLAND, Sc.

The State of Maryland,

To the Sheriff of Baltimore City, Greeting:

YOU ARE HEREBY COMMANDED, That you attach the body of

Jacob Price

if he shall be found in your bailiwick, and have him safe keep, so that you have him before the Judge of the Circuit Court of Baltimore City, at the Court House in the same city on the

23rd day in *May* 1907, to answer as well touching a certain contempt by him committed in not *obeying orders of Court of April 30th 1917*

as well as to such other matters and things as shall be then and there alleged against him

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

WITNESS, The Honorable ^{*Morris A. Cooper*} ~~HENRY D. HARLAN~~, Chief Judge of the Supreme Bench of

Baltimore City, the *21st* day of *May* 1907

ISSUED the day of *May* 1907

Clas R. Nuttallford Clerk.

81
1917 *B57* Circuit Court.
DOCKET No.

Julia Price

vs.
Jacob Price

GENERAL REPLICATION.

MR. CLERK,

Please file

Frank Shook
B Solicitor for Plaintiff .

No. *16288*

FILED *20 June* 1917

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

Julia Price

vs.

Jacob Price

May Term, 19 **17**

The Plaintiff join issue on the matters alleged in answer of

*the Defendant Jacob Price to the bill of
complaint filed in this cause against him*

so far as the same may be taken to deny or avoid the allegations of the bill.

J. Louis Shocket

Solicitor for Plaintiff .

CIRCUIT COURT

81 B 57

1917

Docket

Julia Price
vs.

Jacob Price

Order

191

Petition for leave to take
Testimony and Order
of Court thereon.

Car

B
No. 16288

<13>

Fd 20 June 1917

Julia Price
vs.
Jacob Price

IN THE
Circuit Court
—OF—
BALTIMORE CITY.

To the Honorable the Judge of the
Circuit Court of Baltimore City:

THE PETITION OF *Julia Price*

in this case, respectfully shows that *she* desire^s to take testimony in this case, and
respectfully pray^s that leave be granted to do so before one of the Standing
Examiners of this Court.

Lewis Shockley
Solicitor for Plaintiff

ORDERED, this *20* day of *June* 191*7*, that
leave be granted to the parties to the cause, to take testimony, as prayed, before any one
of the Standing Examiners of this Court.

N Arthur Stamp.

CIRCUIT COURT

8
1917

Docket No.

Julia Rice
vs.

Jacob Rice

ORDER OF APPEARANCE

Mr. Clerk

Please File

Can

[Signature]

Sol. for

No. 16288
(14)

Filed 23 day of June 1917

Julia Pice
vs.
Jacob Pice

IN THE
Circuit Court
OF
BALTIMORE CITY

Term, 19

MR. WHITEFORD, Clerk.

Enter my appearance for Defendant

W. H. Lewis

Solicitor