

3/12/14/41

IN THE
CIRCUIT COURT NO. 2
OF BALTIMORE CITY

STEVEN PURVEY

VS

MARY E. PURVEY

BILL OF COMPLAINT

Mr Clerk:-

Please file, etc.

S. J. M. Duane

Solicitor for Complainant.

No 20811 B
1

Ed 19 September 1921

STEVEN PURVEY : IN THE
VS : CIRCUIT COURT NO. 2
MARY E. PURVEY : OF BALTIMORE CITY

.....oOo.....

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your orator, complaining, says:

-1- That he was married to the defendant, Mary E. Purvey on the 12th day of August, 1916, with whom he resided in the City of Baltimore until December 6, 1916.

-2- That there was one child born as a result of said marriage, viz: Clarence Purvey, age four years.

-3- That while the conduct of your orator has always been that of a good, kind and faithful husband towards the said wife, she, the said defendant on or about December 6th, 1916, abandoned and deserted your orator and declared her intentions to live with him no longer; that the said abandonment is deliberate and final, has continued uninterruptedly for more than three years immediately prior to the institution of this suit, and the separation of the parties is beyond any reasonable hope or expectation of a reconciliation.

-4- That the said defendant, immediately after abandoning your orator took up her residence with a man by the name of Webster Truxton, with whom she has been living in adultery from the time of said abandonment to the filing of this bill, and which offense has never been condoned by your orator.

-5- That your orator has been a resident of the City of Baltimore, State of Maryland for more than two years immediately prior to the institution of this suit.

TO THE END, THEREFORE:

-a- That your orator may be divorced a vinculo matrimonii from the said defendant, Mary E. Purvey.

-b- That your orator may have the custody of his child,
Clarence Purvey.

-c- That your orator may have such other and further re-
lief as his case may require.

May it please your Honor to grant unto your orator the
writ of subpoena directed to the said Mary E. Purvey residing
at 732 W. Redwood Street, Baltimore City, Maryland, commanding
her to be and appear in this Honorable Court, either in person
or by solicitor, on some certain day to be named therein, and
answer the premises and abide by and perform such decree as
may be passed therein.

And as in duty bound, etc.

Steven Purvey
Complainant.

S. J. M. Daugh
Solicitor for Complainant.

STATE OF MARYLAND, CITY OF BALTIMORE, ss:

I HEREBY CERTIFY, that on this 19th day of September,
1921, before me, the subscriber, a Notary Public of the State
of Maryland, in and for said City, personally appeared Steven
Purvey, the within named Complainant, and made oath in due
form of law that the matters and facts set forth in said Bill
of Complaint are true as therein stated.

WITNESS my hand and Notarial Seal.

Meredith C. Hillis
Notary Public.



The State of Maryland
EQUITY SUBPOENA

On



541

Ct. Ct. No. 2

415
1921

Docket No. 3

Purvey
vs.

Purvey

Subpoena to Answer Bill of Complaint

Pro

No. 20811 B
2

Copy - looped

Filed 23 September, 1921
S. J. McDonough
Solicitor.

9

Summoned and copy of the process left with the defendant. Thomas A. Purvey Sheriff

(Ring) 9/19/21 Fee \$0.80

HEREFOR fail not as you will answer the complaint at your peril;
against you exhibited in the CIRCUIT COURT NO. 3 OF BALTIMORE CITY.

WITNESS the Honorable MORRIS A. ROEMER, Chief Judge of the Supreme Bench of Baltimore

Given the _____ day of _____ 1921 in the year 1921

Clerk

MEMORANDUM:
You are required to file your answer or other defence in the Clerk's Office, Room No. 232, in the Court House, Baltimore City, within fifteen days after the return day. (General Practice Rule 11.)

EQUITY SUBPOENA

The State of Maryland

To

Mary E. Purvey ^{AP 9/09 p.1}
732 N. Redwood St

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

Steven Purvey

against you exhibited in the CIRCUIT COURT NO. 2 OF BALTIMORE CITY.

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

WITNESS, the Honorable MORRIS A. SCOPER, Chief Judge of the Supreme Bench of Baltimore City, the 13 day of September, 1921

Issued the 19 day of September, in the year 1921

John Pleasants

Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

415/1921
In The Circuit Court
No 2

of Baltimore City

Steven Purney

vs

Mary Purney

Answer to Bill for Divorce
Petition for Alimony & Custody

Mr Clerk please file

Edward J. [Signature]

No 210811 B.
3.

DAVIS & BISHOP
ATTORNEYS AT LAW
BANNEKER BUILDING
14 E. PLEASANT STREET
BALTIMORE, MD.

Ed. 29 September 1921

STEVENS PURVEY

IN THE CIRCUIT COURT

VS

OF

MARY PURVEY

BALTIMORE CITY.

.....

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your respondent respectfully answers:-

FIRST, The respondent admits the allegations as contained in the first paragraph of the petitioner bill of complaint.

SECOND, The respondent admits the second paragraph of the petitioner bill of complaint.

THIRD, The respondent denies with great emphasis the allegations as contained in the third paragraph of the petitioner bill of complaint.

FOURTH, She denies with great emphasis the allegations of the fourth paragraph as contained in the petitioner bill of complaint.

FIFTH, The respondent admits the allegations as contained in the fifth paragraph of the petitioner bill of complaint.

SIXTH, She avers that in the last two years the petitioner has contributed but fifteen dollars for the support of the minor child; the custody of which the petitioner is praying the court; your respondent avers further that the child is four years and four months of age; hence your respondent avers that the attention of a mother is necessary to a child in this stage of life.

SEVENTH, Your respondent is advised by counsel that she is entitled to have this Honorable Court ordering the petitioner to pay your respondent alimony pendente Lite for herself and her infant child, and her solicitor for his services in the cause.

She is also advised that the petitioner is receiving compensation from the United States Government practically amounting to one hundred dollars, and that she is without means to defray the expenses of this litigation.

WHEREFORE, YOUR RESPONDENT PRAYS:

THAT the suit be dismissed with the intended cost and that she will be permitted to have the custody of her minor child.

(Signature) Jaus - also former husband

State of Maryland }
Baltimore City } To Wit

I hereby certify that on this twenty third day of September, 1921, before me the subscriber a Notary Public, in and for the State of Maryland, Baltimore City, personally appeared before me Mary Purvey, the complainant and made oath in due form of law that the above facts are true to the best of her knowledge and belief.

As witness my hand and seal

Mary E. Purvey.

Caroline Murray.
NOTARY PUBLIC.



Serve on
Steven Purvey.
411 1/2 Salem St

332 N Mount

B Docket #114
1921

CIRCUIT COURT No. 2

Purvey

vs.

Purvey

Order Counsel Fee and Alimony.

Pendente Lite
Husband Plaintiff

ORDER 30 September 1921
" 18 October 1921
No. 210811 B.

()

Copy kept
Copy kept = kept

Filed 30 September 1921
" 18 October 1921
J. Stewart & Davis Sols
13

Now East Thomas F. M. Mully Sheriff

2nd Returns.

Copy of the within Order of Court served on
Steven Purvey on the 26th day of October, 1921
in presence of Harry J. Brooks.
Thomas F. M. Mully
Sheriff

Fee \$0.50

10/20/21

Steven Purney

vs.

Mary Purney

IN THE

CIRCUIT COURT No 2

OF

BALTIMORE CITY

September

TERM, 1921

ORDERED BY THE COURT, this 30 day of September 1921

that the Plaintiff Steven Purney

pay to the Defendant Mary Purney

the sum of twenty Dollars as Counsel Fee for the

Solicitor of the Defendant, and that he further pay the sum of eight

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

Mary Purney

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 15th

day of October 1921, provided a copy of this Order be served on the said Plaintiff

Steven Purney on or before the 5th

day of October 1921

H. Arthur Stamp

TRUE COPY—TEST:

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court No. 2, of Baltimore City this 18 day of October 1921, that the time for showing cause under said Order be extended to the 3 day of November 1921, and the time for service of a copy of the same be extended to the 24 day of October 1921.

H. Arthur Stamp

Circuit Court No. 2

415 B
1921 Docket 30

Steven Purvey

vs.

Mary Purvey

Carroll
Petition for Leave to Take
Testimony and Order of
Court Thereon.

No. 20811 B
6

Filed 30 in September, 1921

Steven Purvey

IN THE

Circuit Court No. 2,

VS.

Mary Purvey

OF

BALTIMORE CITY.

To the Honorable the Judge of the
Circuit Court No. 2 of Baltimore City:

THE PETITION OF

Steven Purvey

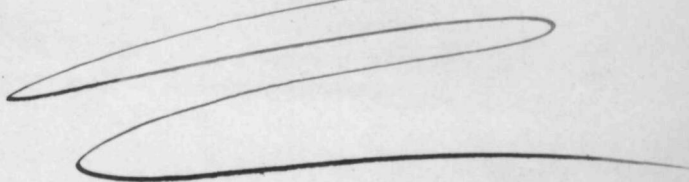
Plaintiff in

in this case, respectfully shows that *he* 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.

S. G. M. Donough
Solicitor for *Plaintiff*

ORDERED, this *30th* day of *September*, 192*1*, 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.

H. Arthur Stump



Serve on

Stephen J. McDonough
Solicitor and

Alfred J. Carr
Examiner

Service of copy admitted
this 6 day of Oct 1921
Alfred J. Carr
EXAMINER

2089 ✓ 31
Circuit Court No. 2
415
1921 30 Docket No. B

Steven Purvey

vs.

Mary Purvey

PETITION AND ORDER TO TAKE
TESTIMONY UNDER 35TH RULE.

No. 20811 B
6

Copy (2) = copied 2

Filed 5 October 1921

Copies of the within Petition and Order of Court served on
Stephen J. McDonough Solicitor, Alfred J. Carr Examiner
on the 6th day of October 1921 in presence of Harry B. Fram
Thomas J. M. Muttly
Sheriff

Steven Purvey

vs.

Mary E. Purvey

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY.

To the Honorable, the Judge of the
Circuit Court No. 2 of Baltimore City:

^{Respondent}
The ~~Plaintiff~~ in this case respectfully shows unto your Honor

That she desires to examine orally, in open Court and in the presence of your Honor, certain witnesses who can testify to the facts and matters relevant to the allegations in the Bill of Complaint filed in this case.

Your Petitioner therefore prays your Honor to pass an order, according to the Statutes for such cases made and provided ^{Your petitioners further prays that order of Court referring papers in this case as signed the 30th of Sept 1921 be rescinded}
And as in duty bound will ever pray.

J. Steward Davis

Solicitor for Plaintiff
Respondent

Upon the foregoing Petition and Application it is this 3rd day of October

A. D. 1921, Ordered that the Petitioner have leave to take testimony as prayed and that the testimony to be offered be taken as required by the 30th Rule of this Court. ^{and that the order referring papers to} And it is further Ordered that ^{examined as signed 30th of Sept 1921 is hereby rescinded} a copy of this Petition and Order be served on the Plaintiff
^{and Alfred J. Carr Esquire} or his Solicitor, on or before the 10th day of October, 1921.

H. Arthur Stump



Ct. Ct. No. 2

435
192 / No. Docket.....

Purvey

vs.

Purvey

Summons for Witness

No. 20811 B
8

Filed 2 day of Nov 1921
S J M Donough
Sol for Plt

In the Circuit Court No. 2 of Baltimore City

Term, 19

The Sheriff will please summon the following witnesses,
returnable on Wednesday the 2 day of
November 1921 at 10 o'clock A. M.

Please issue summons to the following parties:

- 3 Dr. G.W. Kennard, 708 Ensor St., *sd*
- 9 Octavia Keve, #3 S. Penn St., *sd*
- 13 Eugene Keve, 411 N. Gilmor St. *sd*
- 13 Bertha E. Keve, 411 N. Gilmor St. *sd*
- 13 Robert Keve, 411 N. Gilmor St. *sd*

to testify for Plaintiff
in the case of Steven Purvey vs. Mary Purvey

John Pleasant
Clerk of Circuit Court No. 2 of Baltimore City.

Ct. Ct. No. 2

415
1921

No. B Docket 30

Purway

vs.

Purway

Summons for Witness

No. 20811B
9

Filed 2 day of Nov 1921
J. S. Davis

In the Circuit Court No. 2 of Baltimore City

Sept Term, 19*27*

The Sheriff will please summon the following witnesses,

returnable on *Wednesday* the *2nd* day of *November* 192*7* at *10* o'clock A. M.

9 *Mary Purney M* *732 W Redwood St*

to testify for *Plaintiff Defendant*

in the case of *Purney* vs. *Purney*

John Pleasant
Clerk of Circuit Court No. 2 of Baltimore City.

Circuit Court No. 2

415
1921

Docket 30

Steven Purvey

vs.

Mary Purvey

Law

Petition for Leave to Take
Testimony and Order of
Court Thereon.

No. 20811 B
10

Filed 3 November 1921

Hand begin

3

11-1

Circuit Court No. 2

Handwritten notes on the right page, including a vertical list of numbers and other illegible markings.

John Purney

IN THE

Circuit Court No. 2,

vs.

OF

Mary Purney

BALTIMORE CITY.

To the Honorable the Judge of the
Circuit Court No. 2 of Baltimore City:

THE PETITION OF ~~the defendant~~ plaintiff

in this case, respectfully shows that ~~she~~ desire ^s to take testimony in this case, and respectfully pray ^s that leave be granted ^{him} to do so before one of the Standing Examiners of this Court, ~~rescinding order of court passed Oct 5, 1921~~

[Signature]

Solicitor for ~~defendant~~

ORDERED, this ^{3rd} day of ^{November}, 1921, 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. ~~and the order of court passed Oct 5, 1921 is hereby rescinded~~

H. Arthur Stamp

I hereby assent to above order

[Signature]
S. J. M. Quough Attorney for Plaintiff

1A13

Oct. Ct. No 2. ⁴¹⁵
B 1921

Steven Purvey

v

Mary Purvey

PLAINTIFF EXHIBIT,
EXAMINER, No. 1

FILED WITH THE EXAMINER

the 12th day of Nov. 1921

Alfred J. Barr
Examiner.

THIS CERTIFIES

That

Mr. Steven Purvey
of Baltimore, Md.
and
Miss Mary E. Lewis
of Baltimore, Md.

Were united by me in

Holy Matrimony

According to the ordinance of God and the

Laws of Maryland

at Parsonage, 8th P.M.

on the 12th July

day of August

in the year of our Lord 1916

S. A. Virgil, Pastor
St. Paul, M. E. Church

Witnesses

