

3/13/1924

10

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

64 B 643

WALTER QUICKLEY

VS.

MAGGIE QUICKLEY

321 Forest St.

B-27671

BILL FOR DIVORCE.

Mr. Clerk:-

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF.

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

Advt Sept 1924

WALTER QUICKLEY

:

IN THE CIRCUIT COURT

VS.

:

OF

MAGGIE QUICKLEY

:

BAETIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

1. That he was married to his wife, Maggie Quickley, on the 18th day of October, 1911 and with whom he resided until the 8th day of August, 1923.
2. That ever since said marriage your Orator has behaved himself as a faithful, chaste and affectionate husband toward the said Maggie Quickley.
3. That the said Maggie Quickley has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned men in Baltimore City, whose names to your Orator are unknown, and said offense has not been condoned by your Orator.
4. That your Orator has not lived or co-habited with the said defendant since he discovered her adulteries.
5. That there are no children as issue of said marriage.
6. That both your Orator 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.

TO THE END, THEREFORE:

- (a) That your Orator may be divorced A Vinculo Matrimonii from the said Maggie Quickley.
- (b) That he may have such other and further relief as his case may require.

May it please your Honor to grant unto your Orator the Writ of Subpoena directed against the said Maggie Quickley, commanding and requiring her 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.

Javis and Evans
SOLICITORS FOR COMPLAINANT.

RECEIVED AT
THE SHERIFFS OFFICE OF

FEB 6 1927 4 09 PM

B673 f33
~~3457~~

Ct. Ct.

192 4 Docket No.

Walter Quickley

not at this address

Maggie Quickley

1117 McAlberry St

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B 27671
B 37(4)

Filed Feb 14, 1927

Davis and Evans.

Feb 14 Meh 1927

SOLICITOR S.

3

John E. Potee
Sheriff

Mon Est
Buck

14 Feb 1927

REISSUED TO March. Return Day, 1927

Chas R Whiteford
Clerk

John E. Potee
Sheriff

Mon Est
Buck

EQUITY SUBPOENA

The State of Maryland

To

Maggie Quickley
321 Forrest 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 *February* next cause an appearance to be entered for you and your answer to be filed to the complaint of

Walter Quickley

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

10

day of

January

192

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Issued the

8th

day of

February, in the year 192

7

Chas R Whiteford

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.

Copy.

Ct. Ct.

192

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed....., 192...

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

To

Maggie Quickley
321 Forrest St.

REISSUED TO March ^{14 Feb} Return Day, 192 ⁷
Chas R Whiteford Clerk

of Baltimore City, Greeting:

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Walter Quickley

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 10 day of January 192 7
Issued the 8 day of February, in the year 192 7

Chas R Whiteford 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.