

B 531
1923 In The
Circuit Court of
Baltimore City.

George I. Reed

vs

Frances Reed.

310 Worsley St
New Bottley
(Bk 20 & 21st Sts)

Bill of Complaint.

B 25761
217
Mr. Clerk:

Please file, &c.,

W. H. Fair
Sol. for Plff.

WILLIAM HARRY FAIRO
ATTORNEY-AT-LAW
1208 PENNSYLVANIA AVE.
BALTIMORE, MD.

Ad 13" Aug 1923

George I. Reed * In The
*
vs * Circuit Court of
*
Frances Reed. * Baltimore City.

To The Honorable, The Judge of Said Court:

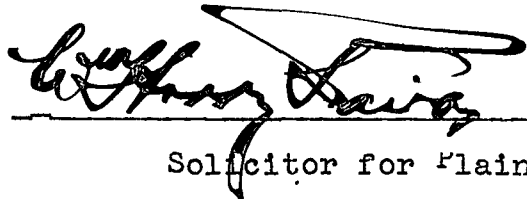
The Plaintiff, complaining, respectfully represents unto Your Honor, as follows:

1. That he and the above named defendant were united in the bonds of matrimony on or about the 6th day of September, 1906, by an ordained Minister of the Gospels.
2. That there was no issue from said marriage.
3. That the parties to this cause have resided in the City of Baltimore and State of Maryland for more than the two years last past.
4. That the defendant deserted and abandoned your orator on or about the 15th day of February, 1911; that said desertion and abandonment has been continued and uninterrupted for more than the past three years; that it is deliberate and final and without reasonable hope or expectation of a reconciliation.
5. That the plaintiff always conducted himself as a true, kind and loving husband and never gave the defendant any just cause or provocation for her conduct as aforesaid.

TO THE END THEREFORE THE PLAINTIFF PRAYS:

- (A) That he may be granted a decree of divorce a vinculo matrimonii from the said defendant;
- (B) That he may be granted the Writ of Sub-poena, directed unto the said defendant, requiring her to appear and answer hereto.
- (C) And that he may have such other and further relief as he may in equity be entitled to have and receive.

And as in duty bound will ever pray, etc.,


Solicitor for Plaintiff.

Plaintiff.

413

B531
192 3

Ct. Ct.

Docket No.

Reed
vs

Reed
310 Worsley St

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Pm
B 25761
L27

Filed

11 Sept

192 3

Am Harry Paris

SOLICITOR

19

Summoned and a copy of the Process left with the defendant.

8/4/23

(Piley)

For #10.80

Thomas v the bully,
Sheriff.

EQUITY SUBPOENA

The State of Maryland

To

*Frances Reed
310 Worsley
near Barclay
{ Bet. 20th + 21st Sts }*

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 **September** next cause an appearance to be entered for you and your answer to be filed to the complaint of

George J. Reed.

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 **9th** day of **July** 192**3**

Issued the day of **August** in the year 192**3**

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.

(General Equity Rules 11.)

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

B531

GEORGE I. REED

1923

1328 Alochton St

VS.

FRANCES REED

B25761

(13)
RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

J. Steward Davis
SOLICITOR FOR RESPONDENT.

At 2 Oct 1923

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE
BALTIMORE, MD.

3/13/11/35

GEORGE I. REED : IN THE CIRCUIT COURT
VS. :
FRANCES REED : OF
FRANCES REED :
VS. : BALTIMORE CITY.
GEORGE I. REED :
_____ &

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the above entitled cause respectfully says:

(1)

That she admits the allegations contained in the first paragraph of the complainant's bill.

(2)

That she admits the second paragraph of the complainant's bill.

(3)

That she admits the third paragraph of the complainant's bill.

(4)

That she denies with great emphasis the fourth paragraph of the complainant's bill.

Your Respondent states further that she is destitute and without funds to defray the expenses of this litigation; further that she is without the means of support for herself. 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 respondent, and that she will also be awarded a reasonable sum to compensate her Solicitor.

AND again duty bound, etc.

D. Steward Davis
Solicitor for Respondent.

B 63 Docket 531
1923
Circuit Court

Reed
vs.
Reed

Order Counsel Fee and Alimony
Pendente Lite

1328 Stockton
No. B 25761
{5} {4}
J. Stewart {5} same-atty

A 2 Oct 1923

Non Est.
Thomas F. McAvally
(Shonster & Nitch) Sheriff.

2nd Return.
Non Est.
Thomas F. McAvally
(Shonster) Sheriff.

George I Reed
vs.
Frances Reed

-IN THE-
CIRCUIT COURT

-OF-
BALTIMORE CITY

Sept TERM

ORDERED BY THE COURT this 3 day of October 1923

that the Plaintiff George I Reed

pay to the Defendant Frances Reed

the sum of Fifty Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of Ten

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

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 18

day of October 1923, provided a copy of this Order be served on the said Plaintiff

George I Reed on or before the 13

day of October 1923

Henry Duff

TRUE COPY—TEST:

CLERK

Docket.....

Circuit Court

vs.

Order Counsel Fee and Alimony

Pendente Lite

No.

—IN THE—
CIRCUIT COURT

—OF—
BALTIMORE CITY

Sept TERM

George I. Reed

vs.

Frances Reed

ORDERED BY THE COURT this **3^d** day of **October** 19**23**

that the Plaintiff **George I. Reed**

pay to the Defendant **Frances Reed**

the sum of **Fifty** Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of **Ten**

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

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the **18th**

day of **October** 19**23**, provided a copy of this Order be served on the said Plaintiff

George I. Reed on or before the **13th**

day of **October** 19**23**.

Henry Duffy

TRUE COPY—TEST:

Chas R. Whiteford,
CLERK

The foregoing Order having been returned "Non Est" as appears
the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City
this 17 day of October 1923, that the time for showing cause
under said Order be extended to the 31 day of October 1923,
and the time for service of a copy of the same be extended to the 27 day of
October 1923

True Copy Sent

Clas R Whitehead CK

Henry Duffby

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this 17 day of October 1923, that the time for showing cause under said Order be extended to the 31 day of October 1923, and the time for service of a copy of the same be extended to the 27 day of October 1923.

Henry Duffey