

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

*B 217
1924*

RACHEL WILLIAMS JOHNSON

VS.

R. GRAFTON JOHNSON

513 Laurens St

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

*B 26784
217*

J. Steward Davis

George W. Evans
Attorneys for Plaintiff.

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE

BALTIMORE, MD.

Ad 31 March 1924

RACHEL WILLIAMS JOHNSON : IN THE CIRCUIT COURT
VS. : OF
R. GRAFTON JOHNSON : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband R. Grafton Johnson on the 10th day of October, 1923 and with whom she resided until the 31st day of March, 1924 when the defendant deserted the plaintiff.
2. That ever since said marriage, your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said R. Grafton Johnson.
3. That the said R. Grafton Johnson, has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned women in Baltimore City, whose names to your Oratrix are unknown, and said offense has not been condoned by your Oratrix.
4. That there are no children 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.

TO THE END, THEREFORE:

- (a) That your Oratrix may be divorced A Vinculo Matrimonii from the said R. Grafton Johnson.
- (b) That she may resume her maiden name (WILLIAMS).
- (c) 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 Subpoena directed against the said R. Grafton Johnson, 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.

J. Steward Davis - George T. Evans
SOLICITORS FOR COMPLAINANT.

P 135

217
192 4. 260 Ct. Ct.
Docket No.

Johnson



Johnson

SUBPOENA TO ANSWER BILL OF COMPLAINT

513 Cambridge
No. 26784
Lawrence St

Filed 5 April 1924

J. S. Davis SOLICITOR
11

Summoned and a copy of Process left with the Defendant

John E. Potee
Sheriff

(Fee \$0.80)

Budacy
4/2/24

EQUITY SUBPOENA

The State of Maryland

On

R. Grafton Johnson

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

Rachel Williams Johnson

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 10th day of March 1924, Issued the 31st day of March, in the year 1924,

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.)

78462

IN THE CIRCUIT COURT OF

BALTIMORE CITY

64 B 217

1924
RACHEL WILLIAMS JOHNSON

VS.

R. GRAFTON JOHNSON

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

B 26784
Josiah F. Henry
ATTORNEY FOR DEFENDANT
3

Josiah F. Henry
ATTORNEY AT LAW
14 E. Pleasant St.
BALTIMORE, MD.
10 April 1924

RACHEL WILLIAMS JOHNSON : IN THE CIRCUIT COURT
VS. : OF
R. GRAFTON JOHNSON : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the above bill of complaint respectfully says:

(1)

That he admits the first paragraph of the complainant's bill.

(2)

That he neither admits nor denies the second paragraph of the complainant's bill.

(3)

That he denies with great emphasis the third paragraph of the complainant's bill.

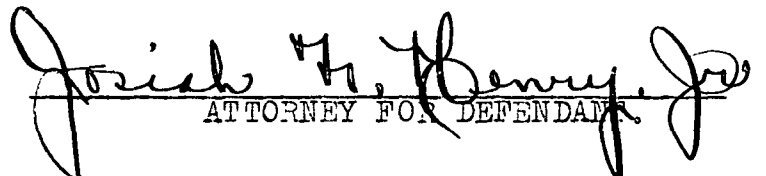
(4)

That he admits the fourth paragraph of the complainant's bill.

(5)

That he admits the fifth paragraph of the complainant's bill.

WHEREFORE your respondent prays that the bill be dismissed with costs to the complainant.


ATTORNEY FOR DEFENDANT.