IN THE CIRCUIT COURT OF

BALTIMORE CITY.

MAGGIE E.ROANE

VS.

GEORGE PHILIP ROANE

1507 Baker St B 29736

BILL FOR DIVORCE

Mr.Clerk:-

Please file.

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BAUMGARTEN & CO., INC.

MAGGIE E.ROANE

IN THE CIRCUIT COURT

VS.

:

:

OF

GEORGE PHILIP ROANE

BALTIMORE CITY.

TO THE HONORABLE. THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

- I. That she was married to her husband, George Philip Roane, June 2,1918 and with whom she resided until the 1st day of October 1925.
- 2. That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said George Philip Roane.
- That the said George Philip Roane has on divers days and times since said marriage, committed the crime of adultery with divers , lewd and abandoned women, whose names to your Oratrix are unknown and said offense has not been condoned by your Oratrix.
- 4. That your Oratrix has not lived or co-habited with the said defendant since she discovered said adulteries.
- 5. That there are no children born as issue of said marriage.
- financing the expenses of this suit and that she is advised by Counsel that she is entitled to have an order passed by this Honorable Court awarding some amount as alimony pending this litigation and some sum certain to compensate her Solicitor.

 The defendant is employed and earns one hundred dollars a month.

7. 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 of complaint.

TO THE END. THEREFORE:

- (a) That your Oratrix may be divorced A Vinculo Matrimonii from the said George Philip Roane.
- (b) Alimony and Counsel fee.
- (c) That she may resume her maiden name GRIFFIN.
- (d) 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 George Philip Roane, 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.

AUMORNIA POR PLATINO TOR

Ct. Ct.

788 192 5

B- Docket No.

65

MAGGIE E. ROANE

VS.

GEORGE PHILIP ROANE

Does nor live of the address

1507 Baker St.

SUBPOENA TO ANSWER BILL OF COMPLAINT

SOLICITOR S

EQUITY SUBPOENA

The State of Maryland

Un

GEORGE PHILIP ROANE

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

MAGGIE E. ROANE

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

14th

day of

September

192 5

Issued the

1st.

day of

October

, in the year 1925.

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)

Ct. Ct.

192

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

SOLICITOR

Form 18-2M

EQUITY SUBPOENA

The State of Maryland

Tn

GEORGE RHILIP ROANE

COPY SEAL

Oct 1925.

REISSUED TO Movember & Traday, 1925.
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