

IN THE CIRCUIT COURT OF

BALTIMORE CITY

63 B 295
1925

WILBERT STREAM

VS.

MADLINE STREAM

561 Union St.

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

J. Steward Davis
ATTORNEY FOR COMPLAINANT.

B 25306

DAVIS & BISHOP

ATTORNEYS AT LAW

BANNER BUILDING

74 E. PLASANT STREET

BALTIMORE, MD.

All May 1925

3/13/1/22

WILBERT STREAM : IN THE CIRCUIT COURT
VS. : OF
MADELINE STREAM : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:-

(1) That he was married to his wife, Madeline Stream, on or about October, 15, 1918 and with whom he resided until about January 11, 1920.

(2) That though the conduct of your Orator toward the said Madeline Stream has always been kind, affectionate and above reproach, she has, without just cause or reason abandoned and deserted him and has declared her intentions to live with him no longer, and that such abandonment has continued uninterruptedly for more than three years and is deliberate and final, and the separation of the parties is beyond any reasonable expectation of reconciliation.

(3) That your Orator has not lived or co-habited with the said defendant since said desertion.

(4) That there is one child, Lawrence, age four years, as issue of said marriage.

(5) 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.

TO THE END, THEREFORE:

(a) That your Orator may be divorced a Vinculo Matrimonii from the said Madeline Stream.

(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 Madeline Stream, 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.

J. Steward Davis

ATTORNEY FOR COMPLAINANT.

EQUITY SUBPOENA

The State of Maryland

279-302
295 B63 Ct. Ct.
1923 Docket No.

Stream

Stream
561 Union St

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. 25306
(2) (3)

Filed 14 May 1923
" 4 June 1923
J.S. Carrs SOLICITOR
10

Thomas J. McQuilty Sheriff
Hon. (Kelly)

5/15-1923

ISSUED TO

RETURN DAY 1923

Summond and a copy of the process
with the defendant - Thomas J. McQuilty
(Kelly) 5/24/23 Fees \$0.80
James B. Whitford Sheriff

EQUITY SUBPOENA

The State of Maryland

To

Madeline Stream

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

Wilbert Stream

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 *17th* ~~10th~~ day of ~~March~~

Issued the *17th* day of ~~May~~, in the year 192 ~~3~~

Chas R. Witeford

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

630 B 299
WILBERT STREAM *1923*

VS.

MADLINE STREAM

DEFENDANT'S ANSWER.

Mr. Clerk:-

Please file.

B 25-306
Joseph H. Berry, Jr.
ATTORNEY FOR DEFENDANT

HAWKINS & McMECHEN
ATTORNEYS AT LAW
BANNIKER BUILDING
14 EAST PLEASANT STREET
BALTIMORE, MD.

FILED

18 Oct 1923

WILBERT STREAM : IN THE CIRCUIT COURT
VS. : OF
MADELINE STREAM : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of Madeline Stream, the defendant named in the bill of complaint against her in this Honorable Court exhibited respectfully says:

- (1) That she admits the allegations contained in the first paragraph of the bill of complaint.
- (2) That she neither admits nor denies the allegations in paragraph two of the bill of complaint, but puts the complainant on strict proof thereof.
- (3) That she admits paragraph three of the bill of complaint.
- (4) That she admits paragraph four of the bill of complaint;
- (5) That your defendant is a poor working woman and has no means of support except what she earns with her own hands, and she is advised that she is entitled to have an order passed by this Honorable Court requiring the plaintiff to pay her a reasonable and proper sum for alimony pendente lite and permanent alimony for the support of their minor child, Lawrence; also a reasonable and proper sum to enable her to defray the necessary expenses of her defense to said bill and to compensate the counsel whom she has employed to defend the said suit.
- (6) That the plaintiff is employed as a chauffeur and earns about eighteen (\$18.00) dollars per week.
- (7) That your respondent may retain the custody of their infant child, Lawrence.

Your respondent therefore prays your Honor to pass an order requiring the said Wilbert Stream to pay her for alimony pendente lite and permanent alimony for the support of their infant child, Lawrence and such a sum at such intervals as to the Court shall seem proper to defray the expenses of defending this suit and to compensate counsel whom she has employed.

AND as in duty bound, etc.

Mrs Madeline Stream Francis F. Berry, Jr.
DEFENDANT ATTORNEY FOR DEFENDANT.

STATE OF MARYLAND, BALTIMORE CITY, to wit:-

I HEREBY CERTIFY, that on this 19th day of May, in the year one thousand nine hundred and twenty three, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City of Baltimore aforesaid, personally appeared Madeline Stream and made oath in due form of law that the matters and facts contained in the foregoing petition are true to the best of her knowledge and belief.

AS WITNESS my hand and Notarial Seal.

Francis F. Berry, Jr.
NOTARY PUBLIC

NOTARY PUBLIC
BALTIMORE CITY
MAY 19 1923