

IN THE CIRCUIT COURT OF

BALTIMORE CITY

B 556
1923
ROSS TERRY

VS.

EVA TERRY

928 W. Franklin St.

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

J. Steward Davis
SOLICITOR FOR COMPLAINANT.

B 25-809

17
Filed 24 Aug 1923

DAVIS

ATTORNEYS AT LAW

BANNEKER BUILDING

14 E. PLEASANT STREET

BALTIMORE, MD.

215-17 Courtland St

ROSS TERRY : IN THE CIRCUIT COURT
VS. : OF
EVA TERRY : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents;

(1)

That he was married to his wife, Eva Terry, on or about the 6th day of January, 1922, and with whom he resided until about the 8th day of January, 1922.

(2)

That ever since said marriage your Orator has behaved himself as a faithful, chaste and affectionate husband toward the said Eva Terry.

(3)

That the said Eva Terry 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 there are no children as result 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 Eva Terry.

(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 Eva Terry, 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.


SOLICITOR FOR COMPLAINANT.

3/13/1157

436-464

Ct. Ct.

B 556
192 3

Docket No.

Perry

vs
non-est

Perry 928-W^m Franklin

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

B 25809
27 (3)

Filed

11 Sept
8th Oct 1923

192 2

J. Stewart & Davis SOLICITOR

13

Shannon J. McVinty
Sheriff

9/13 1923

Return Day, 1923

Colby
E. R. Calkins
Clerk

REISSUED TO

Shannon J. McVinty
Sheriff

non-est.
(Keene)

non-est.
(Keene)

EQUITY SUBPOENA

The State of Maryland

To

*Eva Terry
928 N. Franklin 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 *September* next cause an appearance to be entered for you and your answer to be filed to the complaint of

Ross Terry

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

Baltimore City, the *9* day of *July* 192 *3*
Issued the *24th* day of *August* in the year 192 *3*

Charles P. 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.)

Ct. Ct.

192

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed.....192

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

To

*Eva Terry
928 W. Franklin St*

9/13 1923

REISSUED TO ~~October~~ Return Day, 1923
Chas R Whiteford
Clerk

Seal

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

Ross Terry

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 *9* day of *July* 192 *3*
Issued the *24*" day of *August*, in the year 192 *3*

Chas R Whiteford Clerk.

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(General Equity Rules 11.)