

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

64 B 499

THEODORE HARRIS

1924

VS.

MARY HARRIS

741 Bryan St

Bill for divorce

*Mr. Clerk: -
Please file.*

*Davis & Evans
attorneys for Plaintiff.
B 27 332*

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

Ad 23 July 1924

THEODORE HARRIS : IN THE CIRCUIT COURT
VS. : OF
MARY HARRIS : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

1. That he was married to his wife, Mary Harris on the 13th day of June, 1894 and with whom he resided until about the 15th day of September, 1916 when the defendant deserted the plaintiff.

2. That though the conduct of your Orator toward the said Mary Harris has always been kind, affectionate and above reproach, she has, without any 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 deparation of the parties is beyond any reasonable expectation of reconciliation.

3. That there are eight children as result of said marriage; five infants, Cecelia, age seventeen; Isaac age fifteen; Theodore, age fifteen, William Henry, age twelve; Mary Elizabeth, age nine, now in the care and custody of the defendant.

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

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 of Complaint.

TO THE END, THEREFORE:

(a) That your Orator may be divorced A Vinculo Matrimonii from the said Mary Harris.

(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 Mary Harris, 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.


SOLICITORS FOR COMPLAINANT.

P294

Ct. Ct.

499
1924 B- Docket No. 64

Theodore Harris

vs.

Mary Harris

741 Ryan St

SUBPOENA TO ANSWER BILL OF COMPLAINT

B Pad
No. 27332
(2)

Filed 192

Davis & Evans SOLICITOR

12

Summured and a copy of the process served on the defendant

John E. Potee
Sheriff

Joyce
7/28-24
Two \$0.80

EQUITY SUBPOENA

The State of Maryland

On

Mary Harris

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

Theodore Harris

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 14" day of July 1924 Issued the 23" day of July, 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)

In The
Circuit Court, No. 12
Baltimore City.

W.P.B.
1924

THEODORE HARRIS

VS.

MARY HARRIS.

~~ANSWER~~

*Petition
for Alimony & Custody*

Mr. Clerk:--

B 27332

please file &c.,

Roy S. Bond

Sols. for Respondent.

ROY S. BOND
ATTORNEY AT LAW
220 ST. PAUL PLACE
BALTIMORE, MD.

FILED

16 Aug 1924

THE DAILY RECORD COMPANY
Baltimore, Md.

THEODORE HARRIS

IN THE

- CIRCUIT COURT OF

VS.

BALTIMORE CITY.

MARY HARRIS

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Respondent, Mary Harris, in answer respectfully says:

- (1) She denies paragraph ONE.
- (2) She denies paragraph TWO.
- (3) She admits paragraph THREE.
- (4) She denies paragraph FOUR.
- (5) She admits paragraph FIVE.
- (6) That he only pays your respondent, Mary Harris Five (\$5:00) dollars, per week for five infants and these five infant children are sadly in need of food and clothing. That she is an old woman destitute of any means of support and that she is advised that she is entitled to have an order passed in this case granting her a regular sum as alimony and counsel fee.

That her husband works as a laborer and is capable of earning not less than thirty (\$30) dollars, per week.

WHEREFORE YOUR RESPONDENT PRAYS:

- a- Alimony pendente lite.
- b- Permanent alimony.
- c- Counsel fee in such sum as this Honorable Court may deem just and proper.

As in duty bound, etc.,

Mary Harris
Respondent.

Joseph M. Henry, Jr.
Sols. for Respondent.

STATE OF MARYLAND
BALTIMORE CITY - to wit-

I hereby certify that on this 12th day
of Aug. 1924, before me the subscriber, a Notary Public of
the State of Maryland, in and for Baltimore City, personally
appeared Mary Harris respondent, and made
oath in due form of law, that the matter and facts set forth
in this, her answer are true to the best of his knowledge
and belief.

As witness my hand and Notarial Seal.

Eleanora S. Wright
-NOTARY PUBLIC-

B 64 Docket 499
1924

Circuit Court

Harris

VS.

Harris
1027 Front St.

Order Counsel Fee and Alimony

Pendente Lite

No.

B 27332

147

\$30 a week

5 children

3

7d 18th August 1924

Copy of the within Order of Court served on
Theodore Harris on the 26th day of August 1924 in
presence of Adam S. Buck,

John E. Potee
Sheriff

Fee \$0.50

Theodore Harris
1027 Front St.
vs.

Mary Harris

—IN THE—
CIRCUIT COURT
—OF—
BALTIMORE CITY

July TERM

ORDERED BY THE COURT this 18 day of August 1924

that the Plaintiff Theodore Harris

pay to the Defendant Mary Harris

the sum of Twenty five ⁰⁰/₁₀₀ Dollars as Counsel Fee for the

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

Dollars per week, during the continuance of this suit, to the said Defendant Mary Harris

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 3

day of September 1924, provided a copy of this Order be served on the said Plaintiff

Theodore Harris on or before the 29

day of August 1924

James P. Gorter

TRUE COPY—TEST:

CLERK

3/13/1933

IN THE CIRCUIT COURT

OF

BALTIMORE CITY

THEODORE HARRIS

143

VS

499

MARY HARRIS

Answer to show cause
order.

Mr. Clerk :
Please file.

19-27332

56

Davis & Evans
Sol. for petitioner

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

Id 8th Sept 1933

THEODORE HARRIS

VS

MARY HARRIS

:
:
:
:
:
:

IN THE CIRCUIT COURT

OF

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

YOUR PETITIONER, THEODORE HARRIS, SAYS:

1. That on or about the 23 day of July 1924 he filed in this Honorable Court a bill of complaint against one, Mary Harris, praying a divorce A Vinculo Matrimonii, from the said Mary Harris.

2. That on the 18 day of Aug 1924 the said Mary Harris answered the bill of complaint admitting or denying all the allegations in the original bill of complaint; and further answering the bill set up certain facts in an additional paragraph known as the sixth (6) paragraph; and in answer to the said sixth paragraph the plaintiff says;

That he admits in part and denies in part the allegations made in the sixth paragraph, that is, he admits that he only pays the defendant five dollars (\$5:00) per week, but denies all and the rest of the allegations.

And the plaintiff further says: That he is old and feeble; that he has no fixed salary or income and that his average weekly wage is about twelve dollars (\$ 12:00).

WHEREFORE YOUR PETITIONER PRAYS: That the amount allowed as alimony and counsel be set accordingly.

Davis & Evans
Solicitors for petitioner

Warist Bonds

8

Cir. Ct. No. 2

192 ^{499.} Docket No. *64B.*

THEODORE HARRIS

vs.

MARY HARRIS

MOTION FOR HEARING

B-27332

No. *56*

Filed *8th Sept* 192 *4*

Roy S Bond

207 (100) (100)

Theodore Harris

vs.

Mary Harris

IN THE

Circuit Court No. 2

OF

BALTIMORE CITY

The defendant, Mary Harris,


by -Roy S. Bond-

her

Solicitor, applies to have the above entitled cause placed in the

Trial Calender for hearing on the question of alimony and Counsel fee---

In conformity with the First Equity Rule.



Solicitor for defendant.

Save on

Davis & Evans

Ct. Ct.

B-499

1924

No.

Docket

HARRIS

vs.

HARRIS

NOTICE OF HEARING

No. B-27332

No.

Filed 8 day of Sept 1924

Hecht

Copy of the Within Notice Served on Davis and Evans
Solicitors on September 11, 1924 in presence of Louis Hecht

John E. Potee
Sherriff

New #0.50

215
W Paul

Theodore Harris

Vs

Mary Harris

IN THE
CIRCUIT COURT
OF BALTIMORE CITY

Upon application made by the Solicitor for the Defendant

the above entitled cause has been placed upon the trial calendar in accordance with the provisions of the First Equity Rule, and the same will stand for hearing on Alimony and Counsel fee

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

Circuit Court

⁴⁹⁹
~~1924~~ B 4 B No. 27332 Docket.

Theodore Harris

vs.

Mary Harris

Final Order, Counsel Fee and Alimony
Pendente Lite.

B 27332

No. B.

8

Filed 15 Sept 1924

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

Theodore Harris
vs.
Mary Harris

Sep Term, 1924

This cause coming on to be heard upon the petition for Alimony *pendente lite* and Counsel fee, and the answer thereto, and testimony taken, and having been submitted by the solicitors for the respective parties;

ORDERED by the Circuit Court of Baltimore City this 15th day of September 1924, that the plaintiff Theodore Harris pay to the Counsel for the Defendant the sum of Twenty Five Dollars, as counsel fee for the Solicitor of the said Defendant and that he further pay the sum of Eight Dollars per week, to the said Defendant Mary Harris as Alimony *pendente lite* accounting from the 15th day of September 1924 and continuing until the _____ day of _____ 19____ (should this suit be so long pending) or until the further order of this Court.

It is further ordered that said mentioned amount of Alimony be paid weekly through the Prisoners Aid Society

Charles F. Stein

Circuit Court

499
1914 B 64 No. 27332 Docket.

Theodore Harris

vs.

Mary Harris

Final Order, Counsel Fee and Alimony
Pendente Lite.

B 27332
No. 28) B.

Filed 15 September 1914

Theodore Harris
vs.
Mary Harris

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY.

Sept Term, 1924

This cause coming on to be heard upon the petition for Alimony *pendente lite* and Counsel fee, and the answer thereto, and testimony taken, and having been submitted by the solicitors for the respective parties;

ORDERED by the Circuit Court of Baltimore City this *15th* day

of *September* 19*24* that the Plaintiff, *Theodore Harris*

pay to the Defendant, the sum of *Twenty five (25⁰⁰)* Dollars, as counsel fee

for the Solicitor of the *Defendant* and that he further pay the sum of *five* Dollars per week,

to the said *Defendant*

as Alimony *pendente lite* accounting from the *15th* day of *September* 19*24*

and continuing until the _____ day of _____ 19____, (should this suit be

so long pending) or until the further order of this Court.

It is further ordered that said mentioned amount of alimony be paid weekly through the Prisoners Aid Society. This order to rescind the order of the 15th day of Sept. 1924.

Charles F. Stein

SERVE ON

CT. CT. No. ~~2~~

64, B 499
19 24

THEODORE HARRIS

1027 Front St

VS.

MARY HARRIS

ORDER OF COURT NISI
For Contempt

Order:

B-27332

No. B.

191

Filed

20th Oct

192

4

3

Copy of the within Order of Court served on Theodore Harris on the 23rd day of October, 1924 in presence of Adams & Buck

John P. Potee
Sheriff

Fees \$0.50

THEODORE HARRIS

VS.

MARY HARRIS

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

Ordered by the Circuit Court No. 2 of Baltimore City this 20th day of October 1924
that the plaintiff, Theodore Harris, appear before this Court in person,
on the 27 day of October, 1924, at one o'clock P. M., and then and there show
cause, if any he may have, why he should not be punished for contempt of this Honorable Court
in not obeying the Order of this Court passed on the _____ day of _____, 192
directing the payment of Alimony, pendente lite, by him to the Defendant; provided, a
copy of this Order be served on the said Plaintiff on or before the 25 day
of October, 1924.

John W. [Signature]
Judge.

True Copy: Test

Clerk.