

In The Circuit Court
of B 262
Baltimore 1921

Joseph D. Vessels

vs

Frederick Vessels

Bill for 1 month arrears

W/ Pleas please file

(~~John~~) in

B 22508

(1)

DAVIS & BISHOP
ATTORNEYS AT LAW
BANKER BUILDING
14 E. CALVERT STREET
BALTIMORE, MD.
P. 24 May 1921

Joseph Lawson Vessels

In The Circuit Court

vs.

of

Finetta Vessels

Baltimore City.

To The Honorable, The Judge of Said Court:

Your orator complaining, respectfully says:

FIRST, that the parties hereto were married on or about August 29th. 1906 in Richmond Va. and lived together as man and wife until on or about April 1st. 1916.

SECOND, That the defendant is a resident of the city of Baltimore, State of Maryland.

THIRD, That though the conduct of your orator toward his wife has always been kind, affectionate and above reproach, she without any just cause or reason deserted your orator. That the said defendant has declared her intentions to live no longer with your orator; that the said separation of the parties are beyond any reasonable hope or expectation of reconciliation.

and that the said desertion has continued unaccomplished for more than three years prior to the filing of this bill of complaint

FOURTH, That your orator has never forgiven the said desertion. That he has never cohabited with the said respondent since the desertion.

FIFTH, That there are four children born as a result of this marriage, Mabel, aged 14 yrs. Ada, aged 12 yrs. Lawson, aged 8 yrs. and Harrison, aged 6 yrs.

THEREFORE YOUR ORATOR PRAYS:


a-a A divorce a vinculo matrimonii from the respondent.

b-b Such other and further relief as the case may require.

May it please Your Honor to grant unto your
Orator a writ of Subpoena, directed unto the said respondent,
commanding her to be or appear in this Court on some day cer-
tain to be named therein to perform such decree as may be pass-
ed in the premises.

As in duty bound etc.

Complainant



Solicitors for Complainant.

82

162
192 1261

Ct. Ct.

Docket No.

Vessels

Vessels

Pro

SUBPOENA TO ANSWER BILL OF COMPLAINT

430 E. 23rd St.
B

No. 22508

(2)

Filed June 1921

J. S. Davis

SOLICITOR

18

Summoned and a copy of the Process left with the defendant

(Riley)
6-2-21
Thomas J. Kelly
Sheriff
Fees \$0.80

EQUITY SUBPOENA

The State of Maryland

To

Finetta Vessels

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

Joseph L. Vessels

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of

Baltimore City, the **9th** day of **May** 192 **1**

Issued the **24** day of **May**, in the year 192**1**

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.)

CIRCUIT COURT

262
19 21 Docket No.

Joseph L. Vessels
vs.

Finetta Vessels.

ORDER OF APPEARANCE

Mr. Clerk

Please File

Robt. A. Piper
Sol. for respondent

B 22508

No.

(3)

Filed 26 day of May 19 21

Joseph L. Vessels

vs.

Fenetta Vessels

IN THE
Circuit Court
OF
BALTIMORE CITY

Term, 19

Mr. WHITEFORD, Clerk.

Enter my appearance for Defendant

Robt. A. Piper

~~Fenetta Vessels~~

Solicitor
for defendant.

IN THE CIRCUIT COURT FOR

BALTIMORE CITY.

B 262
1921

Joseph Lawson Vessels

Vs.

Finetta Vessels.

Answer.

Mr. Clerk &c.,

Please file etc.,

Robt. A. Piper
Solicitor for Respondent.

B 22508

(4)

fd 8 June 1921

3/12/14/36

W 2
Q 262
1921

IN THE CIRCUIT COURT FOR
BALTIMORE CITY.

Joseph Lawson Vessels

vs

Finetta Vessels.

and cross bill.

Finetta Vessels

Vs.

Joseph Lawson Vessels.

Cross Bill of Complaint.

Q 22508

Mr. Clerk &c.,

Please file etc.,

Robt A. Piper
Sol. for Complain ant in Cross
Bill.

Ad 28 June 1921
341

Joseph Lawson Vessels,

Vs.

Finetta Vessels.

and Cross Bill.

Finetta vessels,

Vs.

Joseph Lawson Vessels.

:
:
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IN THE CIRCUIT COURT FOR

BALTIMORE CITY.

TO THE HONORABLE THE JUDGE OF SAID COURT:

Your Oratrix, for a cross bill in the above entitled cause respectfully shows:

First: That her husband filed a Bill in this Court for Divorce A. vinculo matrimonii, alleging abandonment and desertion on the part of your Oratrix. That your Oratrix filed her answer to said bill, wherein it was shown that he is entitled to no relief in the premises, but on the contrary your Oratrix is.

Second: That the parties hereto were married in Richmond, Virginia, on or about the 29th. day of August 1906.

Third: That your Oratrix is a resident of Baltimore City State of Maryland, and has been for more than two years prior to the filing of this Bill.

Fourth: That although the conduct of your Oratrix has always been kind, affectionate and above reproach, the said defendant without just cause or reason abandoned and deserted your Oratrix in the year 1916, and declared his intention to live with her no longer. That said abandonment and desertion has continued for more than three years prior to the filing of this bill, is deliberate and final, and the separation of the parties beyond any reasonable hope or expectation of reconciliation.

Fifth: That as a result of said marriage four children were born, viz: Mabel, age 14 years; Ada, age 12 years; Lawson age 8 years; and Harrison age 6 years; all of which are in the care and custody of your Oratrix.

Therefore your Oratrix prays:

a, A divorce a vinculo matrimonii from the defendant Joseph Lawson Vessels.

b, That she may have the care and custody of the four infant children of said parties.

c, That the said defendant may be required to support said children.

That she may have such other and further relief as the nature of her case may require.

May it please your Honor to grant unto your Oratrix the writ of subpoena directed against the said defendant warning him to be and appear in this Court on some certain day to be named therein and answer the premises and abide by and perform such decree as may be passed herein.

AND as in duty bound &c.,

Robt A. Piper
Solicitor for Complainant in Crossbill.

119-134

262 B01

Ct. Ct.

192

Docket No.

Vessels

Vessels

SUBPOENA TO ANSWER BILL OF COMPLAINT

Per

No.

B
22508

(6) (7)

Filed

17 July

192

Rokta Peters

SOLICITOR

Per

Non Est

July 13-1921

Subpoena re-issd to August Return Day

Edmund Stutford
Clerk

2 Return
Non Est

Thomas F. McNulty
Sheriff

Thomas F. McNulty
Sheriff

EQUITY SUBPOENA

The State of Maryland

To

Joseph L. Vessels

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 JULY ^{next} *crossed* cause an appearance to be entered for you and your answer to be filed to the complaint of

Janetta Vessels

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 MORRIS A. SOPER; Chief Judge of the Supreme Bench of Baltimore City, the 9th day of May 192 1

Issued the *28* day of June, in the year 192 1

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.)

Ct. Ct.

192

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed 192

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

To

Joseph L. Vessels

(L.S.)

Subpoena - re issd to August return day

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

Cross hill of

Ernetta Vessels

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the 0th day of May 1921

Issued the 28 day of June, in the year 1921

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 *Jg 262*
Circuit Court of *1921*
Baltimore City.

JOSEPH LAWSON VESSELLS

262

VS.

FINNETTA VESSELLS,
and Cross Bill.

R 22508

Answer. *8*

Mr. Clerk:

Please file, etc.

Joseph A. Tantry
Solicitor for Respondent.

Oct 18 5 19 1922

Joseph Lawson Vessels, :
vs. : IN THE CIRCUIT COURT
Finnetta Vessels, : FOR
and cross bill. : BALTIMORE CITY.

The answer of Joseph Lawson Vessels to the cross-bill of complaint heretofore filed against him in this Honorable Court respectfully shows:

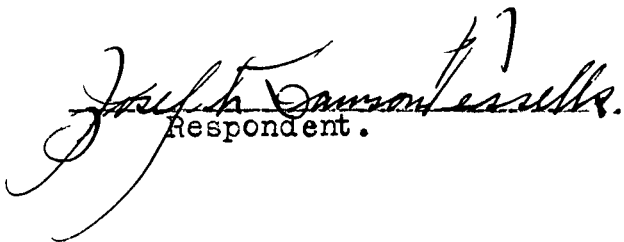
First: That he admits the allegations contained in the First, Second and Third paragraphs of said cross Bill.

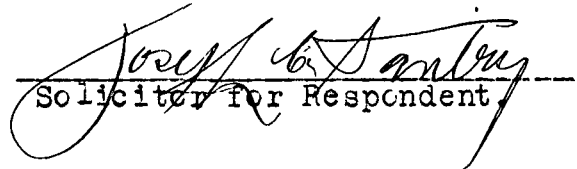
Second: That he neither admits nor denies the Fourth Paragraph of said Bill but holds the plaintiff to strict proof thereof.

Third: He admits the allegations contained in the Fifth paragraph of said bill.

Having fully answered he prays to be hence dismissed with his proper costs.

And as in duty bound etc.,


Respondent.


Solicitor for Respondent.

CIRCUIT COURT

262
1921

Docket No. 61B.

Vessels

vs.

Vessels

+ cross bill

Order

19

**Petition for leave to take
Testimony and Order
of Court thereon.**

[Signature] 22508
No.

9

Fd 1 March 1921

Joseph Lawson Vessels

vs.

Finetta Vessels
+ cross bill

IN THE
Circuit Court
OF
BALTIMORE CITY

To the Honorable the Judge of the
Circuit Court of Baltimore City:

THE PETITION OF Finetta Vessels, complainant in
cross bill

in this case, respectfully shows that she desires to take testimony in this case, and respectfully prays that leave be granted her to do so before one of the Standing Examiners of this Court.

Robt A. Piper
Solicitor for Complainant in cross bill

ORDERED, this 1st day of March 1922, that
leave be granted to the parties to the cause, to take testimony, as prayed, before any one
of the Standing Examiners of this Court.

Carroll J. Bond