

3/31/69

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

64 *D* 256

RUTH WATTS

1924

VS.

RICHARD WATTS

300 N Dallas St

BILL FOR DIVORCE.

Mr. Clerk:-

Please file.

D 26860
J. Steward Davis

George W. Evans.
ATTORNEY FOR PLAINTIFF.

J. STEWARD DAVIS
ATTORNEY AT LAW

215 SAINT PAUL PLACE
BALTIMORE, MD.

D 16 June 1924

RUTH WATTS : IN THE CIRCUIT COURT
VS. : OF
RICHARD WATTS : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT :

Your Oratrix complaining respectfully represents:

(1)

That she was married to her husband, Richard Watts, on the 19th day of October, 1912 and with whom she resided until the 21st day of December, 1922.

(2)

That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife, toward the said Richard Watts.

(3)

That the said Richard Watts, 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 there are no children as issue of said marriage.

(5)

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.

(6)

Your Oratrix further states that she is destitute and without funds to defray the expenses of this litigation; further that she is without the means of support for herself. She is ad-

vised by Counsel that she is permitted to petition this Honorable Court that the defendant shall be compelled to contribute a reasonable amount as alimony pendente lite towards the support of your Oratrix, and that she will be awarded an amount in order to compensate her Solicitor.

Your defendant is employed and earns twenty-five dollars per week.

TO THE END, THEREFORE:

- (a) That your Oratrix may be divorced a Vinculo Matrimonii from the said Richard Watts.
- (b) That this Honorable Court will decree that the defendant pay a reasonable sum as alimony pendente lite and an additional sum as counsel fee.
- (c) Right to resume her maiden name YORKMAN.
- (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 Richard Watts, 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.


SOLICITORS FOR COMPLAINANT.

EQUITY SUBPOENA

THE OFFICE OF THE CLERK OF THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT OF TEXAS

REISSUED TO

Return Day, 1924

5/13/1924

John & Oates
Sherry
John & Oates
Dallas
Dallas
Dallas

Non Est
Bucks

John & Oates

P 192
256 106P
1924
Docket No. Ct. Ct.

Matts

Matts

SUBPOENA TO ANSWER BILL OF COMPLAINT

300 N Dallas
No. 26860

(2)

1st May 1924
J. S. Darr
SOLICITOR
G. N. Evans
3 215 S Paul St

EQUITY SUBPOENA

The State of Maryland

To

Richard Watts

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

Richard Watts

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 **10th** day of **March** 192**4**,

Issued the **16** day of **April**, in the year 192**4**.

Chas B. 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

The State of Maryland
EQUITY SUBPOENA

EQUITY SUBPOENA

The State of Maryland

To

Richard Watts

See

ISSUED TO *June* Return Day, 192*4*
Thomas R. Whiteford
Clerk

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