3/12/13/4 Cernent Court Back \$ 172 (2) Muggaethe 5 Hany thest Beelton Deine GUmules Mor Aert pleas file ?S.1 692 J. STEWARD DAVIS ATTORNEY AT TAW 1 NERY CO

In The Circuit Court

of

Imogene West

vs.

Baltimore City.

Harry West

TO THE HONORABLE, The Judge of Said Court:

Your Oratrix, complaining, respectfully says:

FIRST, That the parties hereto were married on or about August 20th. I9I7 and lived together as man and wife until December 3rd. I9I7. Said marriage occured in Philadelphia Pa. by Rev. Perbis, a Methodist minister.

SECOND, That your Oratrix is a resident of the city of Baltimore, state of Maryland, and has been for more than two years prior to the filing of this bill of Complaint. That the respondent is a non-resident of the city and state and when last heard of was in Charlottsville, Va.

THIRD, That though the conduct of your Bratrix toward her husband has always been kind, affectionate and above reproach, he without just cause or reason was extremely cruel and in his treatment toward your Oratrix. He drank to an excess and fail²⁰ to contribute to either the support of your Oratrix or himself. He spent practically all his time either in drinking or at gambling; That the said Harry West has gone divers days and times commit; ; ted the crime of adultery with divers, lewd and abandoned women whose names are unknown to your Oratrix.

FOURTH, That Your Oratrix has never condoned said offense.

FIFTH, That there are no childredn born as a result of said marriage, THEREFORE YOUR ORATRIX PRAYS:

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

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

May it please Your Honor to grant unto Your Oratrix, an order of publication, setting forth the nature and substance of this bill and warning the said respondent to be in this Court in person or appear by solicitor on or before a certain day, to be therein named and show cause, if any he may have, why a decree should not be passed as prayed.

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State of Maryland Baltimore City, To Wit:

I hereby certify that on this i day of February 1920, before the subscriber, a Notary Public, of the State of Maryland, in and for the Correct of Baltimore, personally appeared Imogene West, the petitioner, in the foregoing proceedings, and made oath in due form of law, that the matter contained therein is true to the best of her knowledge and belief.

As witness my hand and Seal.

Notaty Public.

NYDEIN MORY

NENDORAVE ODILINEN

MOYLA

J.Steward Davis, Solicitor

II8 E. Lexington St. In The Circuit Court of Baltimore City. Imogene West Vs. Harry West. ORDER OF PUBLICATION.

The object of this suit is to procure a decree for a divorce A VINCULO MATRIMONNII, by the plaintiff from the Defendant.

The Bill states that the parties thereto were married in Philadelphia, Pa, on or about the 20th. day of August 1917 and lived together as man and wife until on or about December 3rd. 1917. That the plaintiff is a resident of the city of Baltimore. State of Maryland and has been for more than two years prior to the filing of this bill of complaint. That the respondent is a non-resident of the city and when last heard of was in Charlottesville ,Va. That though the conduct of your Oratrix toward her husband has always been kind, affectionate and above reproach. He without just cause or reason was extremely cruel and in his treatment toward your Oratrix. He drank to an excess and and failed to contribute to either the support of your Oratrix or himself. He spent practically all his time either in drinking or at gambling. That the said Harry West has gone divers days and times committed the crime of adultery with divers, lewd and abandoned women whose names are unknown to your Oratrix. That there are no children born as a result of said marriage.

It is thereupon by the Circuit Court of Baltimore City, ordered this day of 1920. That the plaintiff by causing a copy of this order to be inserted in some daily newspaper, published in the city of Baltimore, once a week for four successive weeks, before the day, 1920; and give notice to the said defendant, Marry West (now absent) of the object and substance of this Bill and warning him to be and appear in this court in person or by Solicitor, on or before the day 1920 to show cause if any he may have why a decree should not be passed as prayed.

John tautur

CIRCIF COURTO. Docket No. Imogene West, Pltff. In Equity. vs) Harry West, Deft. Answer. Mr Clerk Please file ret Charles W. Held Attorney. 807 Fidelity Bldg. Baltimore, Md.

El 15-June 19.20

Υ<u>΄</u>





IMOGENE WEST, PLAINTIFF

vs) HARRY WEST, DEFENDANT) IN EQUITY.

IN THE CIRCUIT COURT FOR BALTIMORE CITY

STATE OF MARYLAND.

TO THE HONORABLE THE JUDGE OF SAID COURT.

The answer of Harry West, the defendant in the above styled cause, to the Bill of Complaint of Imogene West against him exhibited in said Court.

This defendant answering, says:

FIRST.

Your respondent admits that it is true, the said Harry West and Imogene West were duly and legally married on or about the 20th., day of August, in the year 1917; that they lived together as husband and wife until about the third day of December in said year; that the marriage ceremony was performed by Reverend Perbis in the City of philadelphia, in the State of Pennsylvania, and that said Reverend Perbis is or was a minister of the Methodist Church.

SECOND.

Your reppondent respectfully represents that he does not either affirm or deny that said Imogene West is a resident of the City of Baltimore, State of Maryland; nor does he affirm or deny that he is a non-resident of the State of Maryland.

THI BB.

Your respondent respectfully denies that the conduct of said Imogene West to him has always been kind and considerate; and further denies that her conduct now or since said marriage has been above reproach; that he ever drank to excess; that he ever spent large parts of his time in drinking and gambling; that he was ever guilty of adultry as charged in said Bill of Complaint, and further ()denies that he has ever associated with women or girls of questionable oharacter.





FOURTH.

Your respondent admits that there were no children born as a result of said marriage.

FIFTH.

Your respondent having fully answered the said Bill of Complaint he prays that he may hence be dismissed with his costs.

Charles MAreld

• the defendant Harry West. Solicators

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CIRCUIT COURT der Docket No. Imogene West vs. 3 twait and and Harry West Sernera ender Julero Pleme file out. Curred atty PETITION AND ORDER TO TAKE TESTIMONY UN-DER 35th RULE No. 20 15 Fd

Imogene: West, Plaintiff

VS.

Harry West, Defendant

IN THE Circuit Court OF

BALTIMORE CITY

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

The plainff in this case respectfully shows unto your Honor:

THAT he desires to examine orally, in open Court and in the presence of your Honor, certain witnesses who can testify to the facts and matters relevant to the allegations in the Bill of Complaint filed in this case.

Your petitioner therefore prays your Honor to pass an order, according to the Statutes for such case made and provided.

And as in duty bound will ever pray.

Charles W Weld George M. M. Ratt Solicitor for Plaintiff.

Upon the foregoing Petition and Application it is this 15th day of June A. D., 19 20, Ordered that the petitioner have leave to take testimony as prayed and that the testimony to be offered be taken as required by the 35th Rule of this Court. And it is further Ordered that a copy of this petition and order be served on the plaintiff h er Solicitor, on or beor RU0 fore the. 19 day of

Ct. Ct. Docket_ Imoquilles Hom le **SUMMONS FOR WITNESSES** 20692 No. (41/2) Filed 5 day of Themle 19 2

acceived in 7-day of Nod 1921 and forthwith delivered to the Sheriff Talbott Countrol sorvice.

SUMMONS FOR WITNESS

DOCKET_____

In the Circuit Court of Baltimore City

____Term, 19

FOLIO_

The Sheriff will please summon the following witnesses, Morenda 9-1921 _____at 10 A. M. returnable_ Ello Meitzer Terras Oil Com Caston . • r ~ ~ ------. حمير بيدي الولياسيلية بوالينا to testify for planutel in the case of thes (her .vs._ CLERK OF CIRCUIT

In the Cercent Court Emogene West Narry West Harry West Orden Desmissing Bill of Complant 1220692 (6)For 30 Dec 1921

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Emogene West () In the Circuit Court vs. of Harry West. () Baltimore City.

The above cause coming on for a Hearing on bill of complaint, answer thereto and testimony, the counsel for the parties were heard and the proceedings read and considered.

It is thereupon this 30th day of December, 1921, adjudged, ordered and decreed that the bill of complaint in this case be dismissed and it is further ordered and decreed that the Plaintiff pay the costs.

Add H. Hunsler-

CIRCUIT COURT 122 Bles 19 Docket No. Eurogene West Harry West. ORDER OF APPEARANCE Mr. Clerk Please File Sol. for Defendan 0 No. Filed day



Form 20

Emogene Mart Harry West.

IN THE **Circuit Court**

OF

BALTIMORE CITY

ept. Jerm, 192 1

Mr. WHITEFORD, Clerk.

Enter my appearance for Defendant

Harry West Solicitor