

7/15/4/39

In the Circuit Court No 2
of

Baltimore City

Seresa White

vs

Rewis White

1240 Penna Ave

Petition for (Innocent) Mersey

Mr Clerk please file



No 20754 B

Stewart Davis
DAVIS & BISHOP
ATTORNEYS AT LAW
BANNEKER BUILDING
14 E. PLEASANT STREET
BALTIMORE, MD.

Ad. 30 - August 1929

SERESA WHITE

IN THE CIRCUIT COURT No. 2

VS

OF

LEWIS WHITE

BALTIMORE CITY.

.....

To The Honorable, The Judge of Said Court:

Your oratrix complaining respectfully states:--

FIRST, that the parties hereto were married on or about May 14th. 1917, by Rev. J.W.Dupree in Baltimore City, State of Maryland and lived together as man and wife until on or about August 19, 1921.

SECOND, that the defendant 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.

THIRD, that though the conduct of your oratrix toward her husband has always been kind, affectionate and above reproach, he without any just cause or reason abandoned and deserted your oratrix.

FOURTH, that your oratrix has never condoned nor forgiven the said desertion, that she has never cohabited with the said respondent since the desertion.

FIFTH, that there are no children born as a result of said marriage.

SIXTH, that your oratrix is without means with which to defray the expenses of this litigation; that the defendant is the proprietor of a barber shop, employing two other barbers and that the defendant's profit is approximately \$55.00 per wk. That she is advised by counsel that she is entitled to have an order passed by this Honorable Court awarding her a sum certain as alimony during the progress of this suit and a further sum to compensate her solicitor for his services in the cause.

THEREFORE YOUR ORATRIX PRAYS:

a-a A divorce A Mensa et thora

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

c-c Permanent alimony

d-d Counsel fee and alimony pendente lite

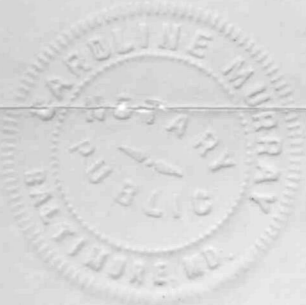
Seressa White.
Complainant

Clara Jay
Attorney For Complainant.

State of Maryland)
Baltimore City) To Wit:

I hereby certify that on this 30th day of August 1921, before me the subscriber, a Notary Public in and for Baltimore City, State of Maryland, personally appeared Seressa White, the complainant in the foregoing bill and made oath in due form of law that the matter contained in the same was true to the best of her knowledge and belief.

Caroline Murray
NOTARY PUBLIC.



176

Ct. Ct. No. 2

385
1921

B

Docket No. 3

White

vs.

White

Subpoena to Answer Bill of Complaint

Pro

No. 20784 B
2

Copy copied

Filed 6 Sept, 1921
J. Stewart Davis
Solicitor.

10

Summoned and a copy of the Process by with

the defendant

(Kelly) Thomas G. Mc Nulty
Sheriff

8/31/21

Free No. 80

EQUITY SUBPOENA
The State of Maryland

To

Lewis White
1210 Penna Ave

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

Gerena White

against you exhibited in the CIRCUIT COURT NO. 2 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 *11* day of *July*, 1921

Issued the *30* day of *August*, in the year 1921

John Pleasant
Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

SERVE ON

Lewis White
1270 Penna Ave

B ³⁸⁵/₁₉₂₁ Docket *30*

Circuit Court No. 2

White

vs.

White

**Order Counsel Fee and Alimony
Pendente Lite**

ORDER *31 August 1921*

No. *20754* B.

Copy copied

Filed *31 August* 19*21*

10

*copy of the within Order of Court served on
Lewis White on the 31st day of August 1921
in presence of John B Kelly.*

*Thomas J. McCully
Sheriff*

Fee \$0.50

Seresa White

vs.

Lewis White

IN THE
CIRCUIT COURT No. 2

OF
BALTIMORE CITY

July

TERM, 1921

ORDERED BY THE COURT, this *31* day of *August*, 1921,

that the defendant *Lewis White*

pay to the plaintiff *Seresa White*

the sum of *18 Eighteen*

Dollars per week, during the continuance of this suit as Alimony, **pendente lite**, unless cause to the contrary be shown on or before the *16th*

day of *September*, 1921, provided a copy of this Order be served on the said defendant

Lewis White on or before the *6th*

day of *September*, 1921, the question of Counsel fee being reserved for the

further determination of this Court.

John D. Dover

TRUE COPY—TEST:

\$55. per week
76 Chesapeake

Clerk.

B 385/1921
In the Ct. Ch. No. 2
of Baltimore City

Deresa White

VS

Lewis White

Answer and
Petition for
ship.

Mr. Clark

Plaintiff

Defendant

No 20754

H

Ed 21 October 1921

Seresia White (

VS.)

Lewis White (

In the

) Circuit Court No. 2 of Baltimore City.

To the Honorable, the Judge of said Court: of complaint filed
and The answer of your respondent to the bill of complaint filed and
exhibited in this Honorable Court respectfully says:-

1. That the marriage is admitted as alleged in the plaintiff's bill of complaint.
2. It is also admitted that there are no children born to bless the union of the respective parties hereto,
3. Your respondent with great respect denies the allegation of desertion, as set forth in the plaintiff's bill; but on the contrary avers that the plaintiff and defendant are residing in the same house although sleeping in separate apartments,
4. Your respondent denies that he is a man of means, and further denies that he earns Fifty Dollars per week from his Barber Shop; but says that the property is in the joint names of your respondent and his wife and that the plaintiff collects the rent therefrom, without making any accountings to your respondent whatever.
5. That the joint property above referred to has an incumbrance thereon, held by the Lafayette Building and Loan Association in the nature of a mortgage, and that said property is going to waste as a result of the inefficient conduct of the plaintiff, and respectfully prays the Court to appoint a trustee or trustees for the said property so that the property may be sold, and an equitable distribution may be had of the funds under the supervision of the Court.
6. That your respondent has no other property, real, personal nor mixed other than the joint property heretofore described, and that your respondent is unable to comply with the order of the Court as to the question of Alimony pendenti lite and permanent Alimony.
7. Your respondent further respectfully says that he is much older than the plaintiff hereto, and that the unfortunate situation thus arisen in a heretofore harmonious family is due to the vigor of youth

and the infirmities of declining years.

Having answered all the material allegations, and in due time your respondent prays that the bill be hence dismissed with the attending costs, and the order of the Court thereon vacated. And as in duty bound. &c.

E. Jackson

.....
Solicitor for the Respondent/

State of Maryland(
Baltimore City)

To Wit.

I hereby certify that on this the ¹⁶th day of September 1921, before me, a subscriber, a Notary Public, in and for Baltimore City, State of Maryland aforesaid, personally appeared Lewis White and made oath in due form that the foregoing Answer is true to the best of his knowledge and belief.



Helen C. Fisher.
Notary Public.

Service & copy admitted
this 14th day of July
1922.

E. J. [unclear]
[unclear] in [unclear]

In The Circuit Court No. 42

Baltimore City

Seresa White

385
B vs

News White

Petition for amendment

Mr. Clerk please file

(Signature)

No 20754 B
5.

DAVIS & BISHOP
ATTORNEYS AT LAW
BANNEKER BUILDING
14 E. PLEASANT STREET
BALTIMORE, MD.

Ad 13 July 1922

258123

SERESA WHITE

:

IN THE CIRCUIT COURT No 2

VS.

:

OF

LEWIS WHITE

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully says:-

1. That on or about the 30 day of August 1921 your Oratrix filed in this Honorable Court a bill of complaint praying among other things a divorce a mensa et thoro from the defendant, Lewis White.
2. That your Oratrix failed to state in the aforementioned petition that at the time of your Oratrix's alleged marriage to the defendant, Lewis White, the said Lewis White was married and was not divorced from his first wife; that on or about the 8th day of July 1920, the defendant, Lewis White did procure a divorce from Carrie White, the first wife of your defendant; and that the date that the defendant Lewis White did procure a divorce from the said Carrie White, the first wife of the said Lewis White was subsequent to the 14th day of May, 1917 which is the date that the alleged marriage ceremony between your Oratrix and the said Lewis White was performed.

WHEREFORE your Oratrix prays leave to amend the first paragraph of the original bill of complaint; to add a seventh paragraph and to add an additional prayer.

AMENDMENT TO FIRST PARAGRAPH

That an alleged marriage ceremony was performed between the parties hereto by Rev. J.W. Dupree in Baltimore City, State of Maryland.

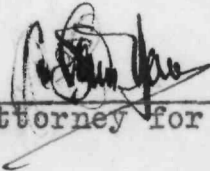
SEVENTH PARAGRAPH

7. That at the time of the alleged marriage between

Lewis White and Teresa White the said Lewis White was married to *Carrie White* and that your Oratrix has not cohabited with the defendant since the discovery of the marriage of the said Lewis White to the said

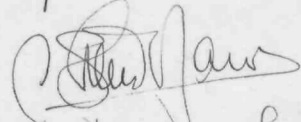
WHEREFORE YOUR ORATRIX PRAYS:

That the marriage between Teresa White and Lewis White be declared null and void abinitio.



Attorney for Complainant.

May it please this Honorable Court to grant unto your Oratrix ^{a writ of Subpoena} commanding the Respondent to come unto this court on some day to be named therein to answer this bill of complaint and to show cause if any he may have why the decree should not be passed as prayed


Attorney for complainant

TERESA WHITE

:

IN THE CIRCUIT COURT ^{11/02}

VS.

:

OF

LEWIS WHITE

:

BALTIMORE CITY

Ordered this ¹² day of *July* 19*22* by the
Circuit Court ^{No 2} of Baltimore City that the original bill of
complaint in the aforementioned case be amended as prayed.

Carroll J. Bond