

3684/1925

IN THE CIRCUIT COURT
NO. 2
BALTIMORE CITY.

MARY WHITE

VS.

HERBERT WHITE

1050 Myrtle Ave

Bill for Divorce-
- E MENSA ET THORO-

No 26054 B

Mr: Clerk:

Please file &c.,

Roy S. Bond
Attorney at Law

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

FILED *W. H. ...*

THE DAILY RECORD COMPANY
Baltimore, Md.

MARY WHITE

VS.

IN THE

CIRCUIT COURT NO. 2

HERBERT WHITE

BALTIMORE CITY.

TO THE HONORABLE-THE JUDGE OF SAID COURT:

Your Oratrix, Mary White complaining, respectfully says:

(1) That she was married to her husband, Herbert White, in Baltimore City, State of Maryland, on or about the 22nd day of July, 1920, with whom she resided until on or about the 17th day of November, 1925.

(2) That both parties are residents of Baltimore City, State of Maryland, and have been for more than two years prior to the filing of this, her Bill of Complaint.

(3) That though the conduct of your oratrix towards her said husband, Herbert White, has been kind, affectionate and above reproach in all respects, he without just cause or reason, has been excessively vicious and vile in his conduct, and excessively cruel in his treatment towards her, and by his vicious and vile conduct caused her great pain and mental suffering, thereby compelling her to leave their home; that his acts were deliberate and final, and committed without her procurement, connivance, or consent, and that she has never lived with her husband, nor condoned the said offense since the day of separation.

(4) That your Oratrix is without means to defray the expenses of this litigation, and that the defendant, is a man of means regularly employed as a laborer and earns so far as she can ascertain, Twentyfive(\$25:00) Dollars, per week, and that she is advised by Counsel that she entitled to have an order passed by

this Honorable Court, awarding her a certain sum as alimony, pendente lite, during the progress of this suit, and a further sum to compensate her Solicitor, for services in the same.

(5) That there are no children as issue of said marriage.

WHEREFORE YOUR ORATRIX PRAYS:

- a- That a decree be passed divorcing your Oratrix, E MENSA ET THORO, from the said defendant, Herbert White,
- b- Alimony, pendente lite and permanent,
- c- Counsel fee in such sum as this Honorable Court may deem just and proper,
- d- Such other and further relief as the case may require.

MAY IT PLEASE YOUR HONOR, to grant unto your Oratrix, Mary White, the writ of subpoena, directed unto the said defendant, Herbert White, residing 1050 Myrtle Avenue, ---, commanding him to be and appear in this court, in person or by Solicitor,

on some day certain to be therein named, and perform such decree, as may be passed in the premises.

As in duty bound, etc.,

Mary White
Complainant.

R. M. Bond
Sol. for Complainant.

STATE OF MARYLAND
BALTIMORE CITY - to wit-

I HEREBY CERTIFY that on this ^{23rd} day of November, 1925, before me, the subscriber, a Notary Public, of the State of Maryland, in and for Baltimore City, personally appeared- MARY WHITE- Complainant, in the foregoing proceedings, and made oath in due form of law, that the matter and facts set forth, in this her Bill of Complaint, are true to the best of her knowledge and belief.

AS WITNESS MY HAND AND NOTARIAL SEAL.

Eleanor S. Wright
-NOTARY PUBLIC-



176

684
1925

Ct. Ct. No. 2

B
Docket No. 34

White

vs.

White

Subpoena to Answer Bill of Complaint

PW

No. 26054 B

Copy = escaped

Filed 24th November 1925
Ray S. Bond
Solicitor.

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Summoned and a copy of the Process
left with the Defendant
John. E. Potee
Sheriff
Recd \$0.80
{
Bickley
11/24/25

3/19/2/19

EQUITY SUBPOENA

The State of Maryland

To

Herbert White

1050 Myrtle 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 *December*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Mary 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 JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the *9th* day of *November*, 192*5*
Issued the *24* day of *November*, in the year 192*5*

John Pleasants
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.)

Same as
Herbert White

B 684/1925

IN THE CIRCUIT COURT
NO. 2
BALTIMORE CITY.

MARY WHITE

VS.

HERBERT WHITE

PETITION. + Order

7/26/25
354 B

Mr. Clerk:

Please file &c.,

Roy S. Bond
Sol. for Petitioner.

Copy order = copied

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

FILED 24th November 1925

THE DAILY RECORD COMPANY
Baltimore, Md.

Copy of the within Petition and Order of Court served
on Herbert White on the 24 day of November 1925
in the presence of August J. Bueby

John E. Price
Sheriff

Recd \$0.50

IN THE

MARY WHITE

CIRCUIT COURT NO. 2

VS.

BALTIMORE CITY.

HERBERT WHITE

TO THE HONORABLE-THE JUDGE OF SAID COURT:

Your Petitioner, Mary White complaining, respectfully says:

(1) That heretofore, your petitioner, Mary White, has filed a bill for divorce, E MENSA ET THORO, in this Honorable Court, on the ground of cruelty.

(2) That at divers times and places before the filing of her Bill of Complaint, her husband, the said Herbert White, has molested, abused, and brutally assaulted your petitioner, and on several occasions threatened to end her life.

(3) That although the conduct of your oratrix, has been above reproach in all respects, the said defendant, without provocation, has been excessively cruel in his treatment towards her and excessively vicious and vile in his conduct and by his vicious and vile conduct caused her to leave their home. That she is afraid of her husband, the said Herbert White, and believes he intends to inflict serious bodily harm or kill her.

WHEREFORE YOUR PETITIONER PRAYS: that this court pass an order restraining and enjoining the said defendant, Herbert White, from in anywise, annoying, molesting, or attacking your petitioner, Mary White, both during the pendency of this suit, and pending the further order of this Honorable Court.

-b- Such other and further relief as this case may

require.

As in duty bound, etc.,

Ray-Bond
Sol. for Petitioner.

Mary White
Petitioner.

STATE OF MARYLAND
BALTIMORE CITY - to wit-

I HEREBY CERTIFY THAT ON THIS 23rd
" "

day of November, 1925, before me the subscriber, a
Notary Public, of the State of Maryland, in and for
Baltimore City, personally appeared- MARY WHITE- petition-
er, and made oath in due form of law, that the matter and
facts set forth, in this, her petition, are true to the best
of her knowledge and belief.

AS WITNESS MY HAND AND NOTARIAL SEAL.

Eleonora S. Wright
NOTARY PUBLIC.

UPON THE AFOREGOING BILL OF COMPLAINT, Petition
and affadavit, it is this *24th* day of November, 1925,
ordered by the Circuit Court No-2, of Baltimore City, that
the defendant, Herbert White, in the above entitled cause,
be and he is hereby enjoined and restrained during the pendency
of these proceedings, or until the further Order of this Court,
from in anywise, annoying, molesting or attacking the said
Complainant, ~~---~~Mary White, and that a copy of this order be
served on the said defendant, Herbert White.

Robert F. Stanton

SERVE ON

Herbert White

1057 Myrtle Ave

B ⁶⁸⁴/₁₉₂₅ Docket.....

Circuit Court No. 2

White

VS

White

Order Counsel Fee and Alimony

Pendente Lite

ORDER

No. *716054* B.

H.

Copy = looped

Filed *27th November* 19*25*

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Copy of the within Order of Court served on Herbert White on the 2nd day of December 1925 in Presence of August J. Beeby

John E. Potee
Sheriff

Dels \$0.50

IN THE
CIRCUIT COURT No. 2
OF
BALTIMORE CITY

Mary White

vs.

Herbert White

November

TERM, 1925

ORDERED BY THE COURT, this 27th day of November, 1925,

that the defendant Herbert White

pay to the plaintiff Mary White

the sum of eight

Dollars per week, during the continuance of this suit as Alimony, pendente lite, unless cause to the contrary be shown on or before the 12th

day of December, 1925, provided a copy of this Order be served on the said defendant

Herbert White on or before the 2nd

day of December, 1925, the question of Counsel fee being reserved

for the further determination of this court.

Robert J. [Signature]

TRUE COPY—TEST:

\$25. per week

No child support

Clerk.

IN THE CIRCUIT COURT NO.2

684 OF 834
1925
BALTIMORE CITY.

MARY WHITE

VS.

HERBERT WHITE.

RESPONDENT'S ANSWER

Mr. Clerk:

Please file

No. 26054. B
5

Davis & Evans

ATTORNEYS FOR RESPONDENT.

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

By g^{ra} [Signature]

ED

MARY WHITE : IN THE CIRCUIT COURT NO.2

VS. : OF

HERBERT WHITE : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the bill of complaint in the above entitled case, respectfully says:

1. That he admits the first paragraph of the complainants bill.
2. That he admits the allegations as contained in the second paragraph of the complainant's bill of complaint.
3. That he denies with great emphasis the third paragraph of the complainant's bill of complaint.
4. That he denies with great emphasis the fourth paragraph of the complainant's bill of complaint. *But says that he makes \$15.00 per week*
5. That he admits the fifth paragraph of the complainant's bill of complaint.

WHEREFORE your respondent prays that the bill of complaint be dismissed with costs to the plaintiff.

Davis Evans

ATTORNEYS FOR RESPONDENT