

3/13/1/27

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

64 P 568

CHARLOTTE WOODARD *1920*

VS.

EDWARD WOODARD

611 N Bethel St

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

Davis & Evans
ATTORNEYS FOR PLAINTIFF.

B27463

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

fd 10 August 1920

CHARLOTTE WOODARD : IN THE CIRCUIT COURT
VS. : OF
EDWARD WOODARD : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, Edward Woodard, on the 6th day of July, 1917 and with whom she resided until the 1st day of August, 1924.
2. That ever since said marriage, your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said Edward Woodard.
3. That the said Edward Woodard has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned women in Baltimore City, whose names to your Oratrix are unknown, and said offense has not been condoned by your Oratrix.
4. That your Oratrix has not lived or co-habited with the said defendant since she discovered his adulteries.
5. That there are no children born as issue of said marriage.
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. That she is advised 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 toward the support of herself and that she will be awarded an amount in order to compensate her solicitors.

7. Your defendant is employed and earns an average of forty (\$40.00) dollars per week.

9. 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.

TO THE END, THEREFORE:

(a) That your Oratrix may be divorced A Vinculo Matrimonii from the said Edward Woodard.

(b) That your Oratrix may be declared to be entitled to receive a reasonable sum as alimony pendente lite and an additional sum as counsel fee.

(c) 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 Edward Woodard, 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.

Davis & Evans

SOLICITORS FOR COMPLAINANT.

P 326

568
1924

B

Docket No.

Ct. Ct.

64

Woodward

-VS-

Woodward
611 N. Bethel St

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

^{Pro}
B-27463

6 Sept 1921

Filed

4

~~18th August 1921~~

SOLICITOR

Summoned " and a copy of the Process left
with the dependant

John C. Cotee
Sheriff

Fees \$0.80

(Duck)
8/20/24

EQUITY SUBPOENA

The State of Maryland

To

Edward Woodward

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

Charlotte Woodward

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 **14** day of **July** 192**4**

Issued the **19th** day of **August**, in the year 192**4**

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)

64 B Docket 568
1924

CIRCUIT COURT.

Charlotte Woodward

vs.

Edward Woodward
611 S. 5th St. Tallahassee Fla.

Order for Alimony

Pendente Lite

ORDER

B 27463

B No. _____

(3)

\$40 a week

no other

Fd.: 18th August 1924

3

Copy of the within Order of Court served on
Edward Woodward on the 30th day of August 1924
in presence of Adam S. Buck

John E. Polce
Sheriff

Fees \$0.50

Charlotte Woodward
vs.
Edward Woodward

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

TERM, 1924

ORDERED BY THE COURT this 18th day of August 1924
that the defendant Edward Woodward
pay to the plaintiff Charlotte Woodward
the sum of Thirteen 13
Dollars per week, during the continuance of this suit, accounting from the
day of August 1924 to the said plaintiff Charlotte Woodward
as alimony, *pendente lite* unless cause to the contrary be shown on or before the
day of September 1924, provided a copy of this Order be served on the said defendant
Edward Woodward on or before the 30
day of August 1924

Chas. Woodward

TRUE COPY—TEST:

CLERK

- IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

64 ~~568~~ 568
CHARLOTTE WOODWARD (1924)

vs.

EDWARD WOODWARD

Answer to Order for Alimony
Pendente Lite

B 27463

Mr. Clerk :-

4
Please file & etc.

Paul Bernman
Attorney for Defendent.

Ed 16 Sept 1924

CHARLOTTE WOODWARD

:

IN THE

:

CIRCUIT COURT

vs.

:

OF

:

BAITIMORE CITY

EDWARD WOODWARD

:

.

To the Honorable, the Judge of said Court:

The Defendant, EDWARD WOODWARD, for answer to the Order of this Court dated the 18th day of August, 1924, directing him to show cause as to the payment of alimony pendente lite respectfully shows:

That he is not in possession of such estate nor does he earn such income as to enable him to carry out the provisions of said Order.

AND as in duty bound, etc.

Paul Berman

Attorney for Defendant.

*Ed ward woodward
Respondent.*

368 B6P Ct. Ct.

192 4 Docket

Woodard

vs.

Woodard

Decree Pro Confesso.

B 27463

No.

(5)

Filed

7 Nov 192 P

Charlotte Woodward
vs.
Edward Woodward

IN THE
Circuit Court
OF
BALTIMORE CITY.

Sept Term, 192 *4*

The Defendant having been duly summoned (~~notified by Order of Publication~~) to appear to the Bill of Complaint, and having failed to appear thereto, according to the exigency of the writ, (said Order).

It is thereupon this *7th* day of *November* in the year nineteen hundred and twenty *four* by the Circuit Court of Baltimore City, ADJUDGED, ORDERED and DECREED, that the complainant is entitled to relief in the premises, and that the bill of Complaint be and is hereby taken pro confesso against the defendant. But because it doth not certainly appear to what relief the Plaintiff is entitled, it is further *Adjudged*, and *Ordered*, that one of the Examiners of this Court, take testimony to support the allegations of the bill.

W. H. F. Steen

Davis &
Evans

578
1924

Ct. Ct.
No. Docket

Serve on Paul Berman

Charlotte Woodard

vs.

Edward Woodard

MOTION FOR HEARING

Paul Berman
No. 27463
(6)

Paul Berman

16 Dec

Filed _____ day of _____ 1924

Charlotte Woodard

vs.

Edward Woodard

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The *plaintiff* by *Davis Evans*

her

Solicitor, applies to have the above entitled cause placed on the Trial Calendar

for hearing *on alimony pendente lite*

in conformity with the First Equity Rule.

Solicitor for *Davis Evans*