

IN THE CIRCUIT COURT OF

BALTIMORE CITY

63 B667

ALMA WRIGHT

1912

VS.

HARRY WRIGHT

BILL FOR DIVORCE

Mr. Clerk:-

Please file.

B26021

J. Steward Davis
ATTORNEY FOR COMPLAINANT
(1)(2)

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

A. Nichols 1912

3/13/11/43

ALMA WRIGHT : IN THE CIRCUIT COURT
VS. : OF
HARRY WRIGHT : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:*

Your Oratrix complaining respectfully represents:-

- I. That she was married to her husband, Harry Wright on or about the 12th day of April, 1919, in Charlotte, Virginia; and with whom she resided until about the 15th day of June, 1919.
2. That ever since said marriage, your Oratrix has behaved herself as a faithful, chaste and affectionate wife toward the said Harry Wright.
3. That the said Harry Wright on or about the 15th day of June, 1919 deserted and abandoned the plaintiff without cause or provocation and has declared his intentions to live with her no longer, and that such abandonment has continued uninterruptedly for more than three years and is deliberate and final and the separation of the parties is beyond any reasonable expectation of reconciliation.
4. That there are no children as issue of said marriage.
5. 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; but that the defendant is a non-resident of the State of Maryland but when last heard of was in Buffalo, New York.

TO THE END, THEREFORE,

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

(b) 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 Order of Publication directed against the said Harry Wright, a non-resident of the State of Maryland aforesaid, 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.


SOLICITOR FOR COMPLAINANT

In The Circuit Court of
Baltimore City

Alma Wright
vs.
Harry Wright

Order of Publication

J. S. Steward Davis
Atty for Complainant

ORDER OF PUBLICATION

J. STEWARD DAVIS, SOLICITOR
215 ST. PAUL PLACE

IN THE CIRCUIT COURT OF BALTIMORE CITY

ALMA WRIGHT VS. HARRY WRIGHT

The object of this suit is to procure a divorce a Vinculo Matrimonii by the plaintiff from the defendant.

The bill recites that the parties were married on or about April 12, 1919, in Charlotte, Virginia; that there were no children as issue of said marriage; that the plaintiff has been a resident of the City of Baltimore, State of Maryland for more than two years prior to the filing of this bill and that the defendant is a non-resident of the State of Maryland. That the plaintiff has been a faithful, chaste and affectionate wife; that the defendant, Harry Wright deserted and abandoned the plaintiff on or about the 15th day of June, 1919 and that such abandonment is deliberate and final and without any expectation of reconciliation and has been for more than three years prior to the filing of this bill of complaint.

It is thereupon ordered by the Circuit Court of Baltimore City this 11th day of *October* 1923 that the plaintiff by causing a copy of this order to be published in some daily newspaper in Baltimore City once a week for four successive weeks before the 13th day of *November* 1923, giving notice to the said defendant of the object and substance of this bill and warning him to be and appear in person or by Solicitor on or before the 30th day of *November* 1923 to show cause, if any he may have, why a decree ought not be passed as prayed.

Henry Davis