IN THE CIRCUIT COURT OF BAITIMORE CITY ANNIE WRIGHTSON VS. RUDOLF WRIGHTSON 731 North Side spurrows Point and BILL FOR DIVORCE. Mr.Clerk:-Please file. DAVIS & EVANS ATTORNEYS AT LAW

Fd 27" Oct 1920

BAUMGARTEN & CO., INC.

ANNIE WRIGHTSON

IN THE CIRCUIT COURT

VS.

OF

RUDOLF WRIGHTSON

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

- I. That she was married to her husband, Rudolf Wrightson, on the 1st day of March, 1926 and with whom she resided until the 6th day of September, 1926.
- 2. That ever since said marriage your Oratrix has behaved herself as a faithful, chaste and affectionate wife. toward the said Rudolf Wrightson.
- That the said Rudolf Wrightson has on divers days and times since said marriage, committed the crime of adultery with divers, lewd and abandoned women, whose names are unknown to your Oratrix 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 said adulteries.
- 5. That there are no children born as issue of said marriage.
- 6. That both your Oratrix and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than two years prior to the filing of this Bill of Complaint.

TO THE END THEREFORE:

(a) That your Oratrix may be divorced A Vinculo Matrimonia

from the said Rudolf Wrightson.

- (b) That she may resume her maiden name " RAINEY ".
- (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 Subpoens directed against the said Rudolf Wrightson, 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 + Evaus

Survivored and Survey.

Seleb Nation

lisecived Long 25 1926 at

-----A. forthwith delivered to

B48/ Ct. Ct.

1926 No. Docket

Cennie Afrightson

LQ.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B3/17/.

Filed 3 Nov 1926 Davis End Evans Solicitor 5

Served 10/29/26.

EQUITY SUBPOENA

The State of Maryland

Un

Rudolf. Drightson # 731 North Dide Sparrows Point

Of Ballimore

County, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said city, on the Second Monday of November 1926 to answer the complaint of Clinic Urightson

against you in said Court exhibited.

HEREOF fail not, as you will answer the contrary afyour peril.

WITNESS the honorable MORRIS A , Chief Judge of the Supreme Bench day of September 1926 of Baltimore City, the

27" day of October

in the year 19 26.

IN THE

CIRCUIT COURT OF

BALTIMORE CITY.

ANNIE WRIGHTSON

VS.

RUDOLF WRIGHTSON.

ANSWER.

MR. CLERK: PLEASE FILE:

MICHAEL F. FREEDMAN ATTORNEY AT LAW

818 EQUITABLE BUILDING BALTIMORE, MD.

FILED

The Daily Record Co. Print, Balte., Md.

ANNIE WRIGHTSON

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IN THE

VS.

*

CIRCUIT COURT OF

RUDOLF WRICHTSON.

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BALTIMORE CITY.

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Respondent, filing his Answer in the above entitled case, respectfully asys unto Your Honor as follows:

1-That he admits the allegations as set forth in paragraphs one, five, and six of the said Bill of Complaint.

2-That he denies the allegations as set forth in paragraphs two, three and four of said Bill of Complaint and demands strick proof thereof.

Having fully Answered the said Bill of Complaint your Respondent respectfully requests that the same be hence dismissed.

And as in duty bound, etc.,

Charles FOR DROPONIENT

Budolph Wrightson

CIRCUIT COURT

Docket No. 66 /B

Rudolf Wrightson

Order

Petition for leave to take Testimony and Order of Court thereon.

B No. 3//7/

IN THE Circuit Court OF BALTIMORE CITY to take testimony in this case, and do so before one of the Standing
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