

# In the Second Judicial District Court

Of the State of Nevada, in and for the County of Washoe

<b>GLADYS</b> [REDACTED]
Plaintiff
vs.
<b>FITCH HARTFORD</b> [REDACTED]
Defendant

No. 43201

Dept. No. 2

Filed..... 19.....

Clerk.

By.....

Deputy.

## SUMMONS

The State of Nevada Sends Greetings to the Said Defendant:

You are hereby summoned to appear within ten days after the service upon you of this Summons if served in said county, or within twenty days if served out of said county but within said Judicial District, and in all other cases within forty days (exclusive of the day of service), and defend the above-entitled action. This action is brought to recover a judgment

and decree of this Honorable Court forever dissolving the bonds of matrimony now and heretofore existing between you and the plaintiff on the ground of extreme cruelty, as is more fully

Described in the Complaint.

Dated this 11th day of May, A. D. 19 53

**THATCHER AND WOODBURN**

Attorney for Plaintiff

Clerk of the Second Judicial District Court of the State of Nevada, in and for the County of Washoe.

By....., Deputy.

STATE OF.....

COUNTY OF.....

ss. **AFFIDAVIT OF SERVICE**

..... being first duly sworn, deposes and says: That he is and was on the day when he served the annexed summons, a male citizen of the United States, over the age of twenty-one years, and not a party to the above-entitled action; that he received the annexed summons in said action on the..... day of....., 19....., and personally served the same upon..... the above named defendant, on the..... day of....., 19....., by delivering to..... the said defendant, personally, in..... County of....., State of....., a copy of the annexed summons attached to a duly certified copy of the complaint in the above-entitled action.

Subscribed and sworn to before me

this..... day of....., 19.....

Notary Public in and for the County of.....

State of.....

(My Commission expires.....)

1  
2 Filed \_\_\_\_\_, 19\_\_

3 \_\_\_\_\_ Clerk  
4 By \_\_\_\_\_ Deputy  
5

No. 43211  
Dept. No. 2

6 THATCHER & WOODBURN  
7 Attorneys for Plaintiff

8 In the SECOND Judicial District Court of the State of Nevada  
9 In and for the County of WASHOE

10  
11 GLADYS [REDACTED],

12 Plaintiff.....

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15  
16 vs.

17 FITCH HARTFORD [REDACTED]

18 Defendant.....

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C O M P L A I N T

21 COMES NOW the plaintiff, by her attorneys, Thatcher and  
22 Woodburn, and for cause of action against defendant, alleges as  
23 follows:

24 I.

25 That plaintiff is now, and for more than six weeks last  
26 past and immediately preceding the filing of this complaint, has  
27 been, and now is, a resident of and domiciled in the County of  
28 Washoe, State of Nevada; that plaintiff, during all of said time,  
29 has been actually present and domiciled in the City of Reno,  
30 County and State aforesaid.

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II.

That the plaintiff and defendant were married in the City of New York, State of New York, on the fourteenth day of June, 1922, and ever since have been, and now are, husband and wife.

III.

That there are two minor children the issue of said marriage, to-wit: FITCH HARTFORD [REDACTED] JR., of the age of eight years, and RICHARD [REDACTED], of the age of five years. That under date of March twentieth, 1933, the plaintiff and defendant have entered into an agreement, under the terms of which all property rights and the custody and support of the said minor children have been settled; that said agreement is in all respects just, fair, reasonable and equitable.

IV.

That since the said marriage of the parties, defendant has treated plaintiff with extreme cruelty and has subjected her to a course of extremely cruel conduct which commenced shortly after the said marriage and continued until the final separation of the parties. That the said conduct of defendant toward the plaintiff has caused plaintiff great mental and physical suffering, and that by reason thereof, the life of plaintiff has been rendered miserable and unbearable, her peace of mind disturbed and her health impaired, and that further cohabitation with the defendant will result in the permanent impairment of plaintiff's health.

WHEREFORE, plaintiff prays judgment of this Honorable Court as follows, to-wit:

1. That the bonds of matrimony now and heretofore existing between plaintiff and defendant be forever and completely dissolved, and that each party hereto be freed and released

1 from all of the responsibilities and obligations thereof, and  
2 restored to the status of single persons;

3 2. That the care, custody, control, maintenance, support  
4 and education of the said minor children, to-wit: FITCH HARTFORD  
5 [REDACTED] JR. and RICHARD [REDACTED], be decreed in accordance  
6 with the terms of the agreement between the parties hereto under  
7 date of March twentieth, 1933, and that said agreement be rati-  
8 fied, approved and adopted by the Court;

9 3. That the property settlement effected between plaintiff  
10 and defendant by said agreement be adjudged and decreed to be  
11 just, fair, reasonable and equitable, and that the terms thereof  
12 be ratified, approved and fully adopted by the Court;

13 4. For such other and further relief as may appear to the  
14 Court to be equitable in the premises.

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16 THATCHER AND WOODBURN

17 Attorneys for Plaintiff.  
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1 STATE OF NEVADA,  
2 COUNTY OF WASHOE. SS.

3 GLADYS [REDACTED] being first duly sworn, deposes  
4 and says: That she is the plaintiff in the above-entitled ac-  
5 tion; that she has read the foregoing complaint and knows the  
6 contents thereof; that the same is true of her own knowledge,  
7 except as to those matters therein stated on information and  
8 belief, and as to those matters she believes it to be true.

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11 GLADYS [REDACTED]

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13 Subscribed and sworn to before me  
14 this 11th day of May, 1933.

15 (SEAL) WM. WOODBURN  
16 Notary Public in and for the County  
17 of Washoe, State of Nevada.

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