

IN THE CIRCUIT COURT

OF

BALTIMORE CITY

*B 338
1936*

LEROY A. FRANKLIN

VS.

MRS. BEATRICE FRANKLIN

*B 41784
(3)*

ANSWER

Mr. Clerk:

Please file, etc.

Thurgood Marshall
Attorney for Defendant.

Service admitted this 1st day
of ~~August~~ September, 1936

Martin Brennan
Attorney for Complainant

THURGOOD MARSHALL

ATTORNEY AT LAW

PHOENIX BUILDING

4 E. REDWOOD STREET

BALTIMORE, MD.

FILED

1st Sept 1936

LEROY A. FRANKLIN : IN THE
VS. : CIRCUIT COURT
BEATRICE FRANKLIN : OF
: BALTIMORE CITY
: (B.-338 - 1936)

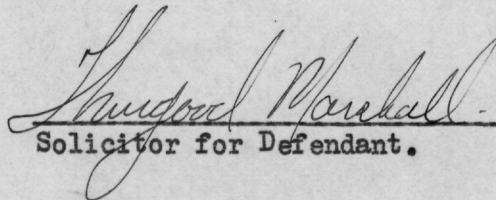
TO THE HONORABLE, THE JUDGE OF SAID COURT:-

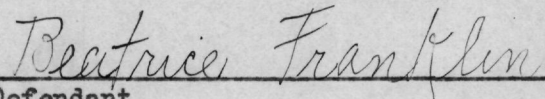
The Defendant, Beatrice Franklin, by her attorney, Thurgood Marshall, for answer to the Bill of Complaint exhibited against her says:

1. She admits allegations contained in the first paragraph of the Bill of Complaint.
2. She admits allegations contained in the second paragraph of the Bill of Complaint.
3. As to the third paragraph of the Bill of Complaint, the Defendant says that there are three children born as a result of this marriage, Charles Franklin, age 14 years, Evelyn Franklin, age 13 years and Thomas Franklin, age 12 years.
4. She denies all the allegations of paragraph four of the Bill of Complaint.

And having fully answered the said Bill of Complaint, the Defendant prays that the said Bill be dismissed.

And as in duty bound, etc.


Solicitor for Defendant.


Defendant.

P 823

CIRCUIT COURT

B-338

19 36	No.	Docket
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LeRoy A. Franklin

vs.

Beatrice Franklin

SUBPOENA TO ANSWER BILL OF COMPLAINT

PD

No. B 41784

(2)

Filed *19 June* 19 *36*

Martin Beerman

Solicitor

3

EQUITY SUBPOENA

The State of Maryland

To Beatrice Franklin,
629 Sterling Street
B-338-1936



CIRCUIT COURT
Docket
1936
No.
Beatrice Franklin
LeRoy A. Franklin

SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B-338-1936

(S)

Filed
1936
MAY 11
MAY 11

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 July next, cause an appearance to be entered for you and your answer to be filed to the complaint of

LeRoy A. Franklin

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 SAMUEL K. DENNIS, Chief Judge of the Supreme Bench of Baltimore City, the 11th day of May, 1936
Issued the 17th day of June, in the year 1936

Clas. 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.

Summoned and a copy of the Process
left with the defendant

1/11
6/17/36

Joseph C. Deegan
Sheriff

Ken p. 95

WITNESS, the Honorable SAMUEL M. DENNIS, Chief Judge of the Superior Court of the State of Maryland.

City, the 11th day of June, 1911.

Filed the 17th day of June, 1911.

650 Sterling Street

In Testimony Whereof, I have hereunto set my hand and the seal of my office at Baltimore, Maryland, this 17th day of June, 1911.

The State of Maryland

ECQUITY SUBPOENA



JUN 21 1911

Circuit Court

338

1936

Docket B.

Beatrice Franklin, Cross-Complainant

vs.

LeRoy A. Franklin, Cross-Respondent

Truck

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

No. B. 41784

6

Filed September 4th,

1936

Beatrice Franklin, Cross-Complainant

vs.

LeRoy A. Franklin, Cross-Respondent

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

To the Honorable the Judge of the
Circuit Court of Baltimore City:

THE PETITION OF Beatrice Franklin, Cross-Complainant

in this case, respectfully shows that she desires to take testimony in this case, and respectfully prays that leave be granted her to do so before one of the Standing Examiners of this Court.

Sugood Marshall
Solicitor for Cross-Complainant

ORDERED, this 4th day of September 1936,

that leave be granted to the parties to the cause, to take testimony, as prayed, before any one of the Standing Examiners of this Court.

Charles F. Stuenkel

IN THE CIRCUIT COURT
OF
BALTIMORE CITY

LeRoy A. Franklin
vs.
Beatrice Franklin

B 338

and

Beatrice Franklin
vs.
LeRoy A. Franklin

B 41784
(4)

CROSS-BILL OF
COMPLAINT

Mr. Clerk:

Please file, etc.

Thurgood Marshall
Attorney for Complainant

THURGOOD MARSHALL
ATTORNEY AT LAW
PHOENIX BUILDING
4 E. REDWOOD STREET
BALTIMORE, MD.

FILED

1st Sept 1936

LeRoy A. Franklin,
Complainant

VS

Beatrice Franklin,
Respondent

AND

Beatrice Franklin,
Complainant

VS

LeRoy A. Franklin,
Respondent

IN THE

CIRCUIT COURT

OF

BALTIMORE

CITY

(B.-338 - 1936)

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

Your complainant, Beatrice Franklin, complaining says:

FIRST: That heretofore LeRoy A. Franklin, the husband of your Complainant, filed his bill of complaint against her in this Court alleging, among other things, that your Complainant had without just cause abandoned said LeRoy A. Franklin and that such abandonment had continued uninterruptedly for at least three years and was deliberate and final, and the separation of the parties was beyond any reasonable expectation of reconciliation, and thereupon the said LeRoy A. Franklin prayed that he might be divorced a vinculo matrimonii from your Complainant.

SECOND: That your Complainant has answered said bill of complaint and in her answer has shown that the said LeRoy A. Franklin is not entitled to any relief from this Honorable Court, but, on the contrary thereof, your Complainant, of right and by the rules and practice of equity, ought to have relief in the premises, all of which matters more fully appear by reference to said bill and answer.

THIRD: That your Complainant was married to the Respondent at Ellicott City, in the State of Maryland, in the month of April, 1923 by a duly ordained minister of the Gospel.

FOURTH: That both Complainant and Respondent are residents of the City of Baltimore, State of Maryland, and have so been for more than two years prior to the filing of this Cross-bill of Complaint.

Harold M. ...
Attorney for Complainant.

Beatrice Franklin
Complainant.

FIFTH: That three children were born as a result of this marriage, Charles Franklin, age 14 years, Evelyn Franklin, age 13 years and Thomas Franklin, age 12 years.

SIXTH: That although your Complainant has at all times been a kind, chaste and affectionate wife toward her husband, LeRoy A. Franklin, the said LeRoy A. Franklin, on or about the summer of 1929, without just cause or provocation, deserted and abandoned your Complainant. That said abandonment and desertion has been continuous and uninterrupted for more than three years prior to the filing of this suit; and was the deliberate and final act of the said LeRoy A. Franklin and there is no reasonable hope or expectation of a reconciliation.

SEVENTH: That the Defendant is employed but your Complainant is unable to state the amount of his earnings, whereas your Complainant is without means of support or of maintaining these proceedings.

WHEREFORE, YOUR COMPLAINANT PRAYS:-

1. That your Complainant may be divorced a vinculo matrimonii from the Defendant.
2. That your Complainant may be awarded a reasonable sum as alimony Pendente lite, and permanent alimony thereafter, in addition to a reasonable sum as counsel fee for her solicitor of record.
3. That your Complainant may be awarded the permanent custody of their minor children, and a reasonable sum to maintain such children.
4. That your Complainant may have such other and further relief as the nature of her case may require.

May it please your Honor, to grant to your Complainant the writ of subpoena, directed to the Defendant, LeRoy A. Franklin, residing at 1229 N. Spring Street, in Baltimore City, demanding him to be and appear in this Honorable Court on or before some certain day named therein, to answer the premises and abide by any decree as may be passed therein.

AND AS IN DUTY BOUND, ETC.

Hurgood Marshall
Attorney for Complainant.

Beatrice Franklin
Complainant.

TESTIMONY taken at the office of George Arnold Frick, Examiner, on Wednesday, September 23, 1936, at ten-thirty o'clock in the morning.

Present: Thurgood Marshall, Counsel for the Plaintiff in the Cross Bill of Complaint.

Martin Beerman, Counsel for the Defendant in the Cross Bill of Complaint.

Thereupon:

BEATRICE FRANKLIN, the Plaintiff in the Cross Bill of Complaint, produced as a witness on her own behalf, being first duly sworn according to law, deposes and saith as follows - that is to say -

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Beatrice Franklin, 629 Sterling Street, Baltimore, Maryland.

2 Q- What is your occupation?

A- Maid.

3 Q- You are the Plaintiff in this Cross Bill of Complaint?

Beatrice Franklin

A- Yes, sir.

4 Q- How long have you known the Defendant in the Cross Bill of Complaint, LeRoy A. Franklin?

A- I guess about nineteen years maybe.

BY MR. MARSHALL:

5 Q- Mrs. Franklin, were you married to the Respondent here, LeRoy A. Franklin?

A- Yes, sir.

6 Q- On what date?

A- April 4, 1923.

7 Q- And where?

A- Ellicott City.

8 Q- By a duly ordained minister of the Gospel?

A- I don't know his name.

9 Q- Was he a minister of the Gospel?

A- Yes.

10 Q- (Examiner) What church?

A- I think Asbury.

11 Q- What kind of minister?

A- Methodist.

12 Q- And he is a minister up there in Ellicott City?

A- Yes, sir.

13 Q- Mrs. Franklin, after that ceremony did you return to Baltimore City?

Beatrice Franklin

A- Yes, sir.

14 Q- And when you returned did you live together at any time as husband and wife?

A- He came to see me every day.

15 Q- But did he actually live with you?

A- No, sir.

16 Q- Where did he live?

A- With his mother.

17 Q- And where did you live?

A- With my mother.

18 Q- Where was that - the same place as you live now?

A- Yes, 629 Sterling Street.

19 Q- And for how long did he come and visit you?

A- Well, he came every day until about August, 1923, and then he went away.

20 Q- 1923?

A- Yes, 1923.

21 Q- Do you know where he went?

A- He went to Philadelphia I learned later on.

22 Q- Now, during the period of those visits what occurred? I mean, were any children born before that time?

A- Two of them.

23 Q- Two children?

A- Yes, sir.

24 Q- What are their names?

Beatrice Franklin

A- Charles Franklin.

25 Q- And the other one?

A- Evelyn Franklin.

26 Q- And their respective ages?

A- Charles is fourteen and Evelyn is thirteen.

27 Q- At the time when he went to Philadelphia were you pregnant then?

A- Yes.

28 Q- And was that child born?

A- After he was in Philadelphia.

29 Q- Is that child living now?

A- Yes, sir.

30 Q- Give his name and age?

A- Thomas and he is twelve years old.

31 Q- Are you living together now?

A- No, sir.

32 Q- Can you explain just the circumstances? I understand that in 1924 he went to Philadelphia. Since that time what has he done for you?

A- He hasn't done much of anything, Mr. Marshall.

33 Q- Has he lived with you?

A- No.

34 Q- Provided for you?

A- No, sir.

Beatrice Franklin

35 Q- Prior to 1924 did he provide for your maintenance?

A- Not all the time.

36 Q- But he did before 1924?

A- Yes.

37 Q- He made some provision?

A- Some.

38 Q- Did he ever provide a home for you or your children?

A- No, sir.

39 Q- Now, in 1924, when he returned from Philadelphia did you attempt to get him to take care of you and your children?

A- Yes, I went to him.

40 Q- And what happened?

A- Well, he didn't give me anything.

41 Q- Did you ask him for support?

A- Yes, I asked him for support.

42 Q- And as the result of that not getting anything, what did you do?

A- I had him arrested.

43 Q- And what year was that?

A- 1924.

44 Q- And what happened then?

A- Well, he gave me six dollars whenever he felt like

Beatrice Franklin

giving it to me.

45 Q- And then what happened after that?

A- I had him arrested again.

46 Q- How many times all together?

A- Three times.

47 Q- As the result of this have you been supported by your husband since that time?

A- No.

48 Q- Since 1924 have you gone to him and asked him to make a home and provide for you and the children?

A- I certainly have.

49 Q- And then in 1929 when you went to see him what was said at that time?

A- I asked him, I said, "Roy, I'd love to have a home for myself and those children." He said, "Well, I don't have anything, but I wish you would get somebody to do for you and care for you."

50 Q- You have had the care and custody of these three children, have you?

A- Yes, sir.

51 Q- This desertion, has it been uninterrupted - I mean by that, have you ever lived with you husband since 1924?

A- No, sir.

52 Q- And certainly not since 1929?

A- No.

Beatrice Franklin

53 Q- When you went to see him?

A- No, sir.

54 Q- Do you think there is any reasonable hope or expectation of a reconciliation between you two?

A- I don't think so.

55 Q- You don't think so. Do you think that the desertion was deliberate and final on his part?

A- I think so.

56 Q- Is your husband a resident of the City of Baltimore and the State of Maryland?

A- Yes, sir.

57 Q- Has he been such for more than three years prior to the filing of this suit?

A- Yes, sir.

58 Q- Are you a resident of the City of Baltimore and the State of Maryland?

A- Yes, sir.

59 Q- And have you been so for more than two years prior to the filing of your suit?

A- Yes, sir.

60 Q- Are you still living in Sterling Street?

A- Yes, Sterling Street.

61 Q- Mrs. Franklin, I show you a paper marked Stipulation, made this 23rd day of September, and ask you have you

Beatrice Franklin

seen that before? (showing witness paper)

A- Yes.

62 Q- I point to the signature over Cross Complainant, Beatrice Franklin, and ask you is that your signature? (indicating)

A- Yes.

63 Q- Do you know your husband's signature?

A- Yes.

64 Q- Is that his signature below your signature? (indicating)

A- Yes, sir.

NOTE: The above mentioned Stipulation is now offered in evidence and filed with the Examiner marked "Plaintiff's Exhibit Examiner No. 1."

65 Q- Mrs. Franklin, during the period from the time that you were married up until 1929 were you continuously trying to get your husband to provide a home for you so you could live together?

A- Yes, sir.

66 Q- And in that meeting, that talk in 1929, what did he say then?

A- Well, I said, "Roy, I'd love to have a home for me and the children." He said, "I don't have anything and I wish you could get somebody to do and care for you."

67 Q- And what did you understand by that?

Beatrice Franklin

A- That he wasn't going to make a home or provide for the children.

68 Q- And that from then on you were separated?

A- Separated.

MR. MARSHALL: That's all.

CROSS EXAMINATION BY MR. BEERMAN:

1 XQ- Mrs. Franklin, you understand by this paper, this stipulation, that you waive all your claim to alimony both pendente lite and permanent? (showing witness Plaintiff's Exhibit Examiner No. 1 heretofore filed)

A- Yes.

2 XQ- And also counsel fee?

A- Yes.

3 XQ- And that you further understand that this agreement is for five dollars per week to be paid you for the support of the minor children that you have by this marriage?

A- Yes, sir.

4 XQ- And it is your assertion that the ^{three} children, Charles Franklin, Evelyn Franklin and Thomas Franklin were all born as the result of this marriage?

A- Yes, sir.

5 XQ- And that LeRoy A. Franklin is the father of all those children?

A- Yes, sir.

MR. BEERMAN: That's all.

QUESTION BY THE EXAMINER:

Do you know or can you state any other matter or thing that may be of benefit or advantage to the parties to this suit or either of them or that may be material to the subject of this your examination or the matters in question between the parties? If so, state the same fully and at large in your answer.

Answer:

No.
Beatrice Franklin.

MARY PINDELL, produced as a witness on behalf
in the Cross Bill of Complaint
of the Plaintiff/, being first duly sworn according to law,
deposeth and saith as follows - that is to say -

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Mary Pindell, 524 N. Eden Street, Baltimore,
Maryland.

2 Q- What is your occupation?

A- House work.

3 Q- Do you know the parties to this suit?

A- Yes, sir.

4 Q- How long have you known them?

A- The Plaintiff in the Cross Bill of Complaint is my
cousin and I have known her all my life. I have known him
since they have been married, since 1923.

BY MR. MARSHALL:

5 Q- Were you present at their marriage ceremony?

A- No.

6 Q- Do you know when they were married?

A- Yes.

7 Q- What year?

A- 1923.

Mary Pindell

8 Q- Now, did they live in your community after that or about around where you lived ?

A- Yes, I used to go and visit them on Sterling Street.

9 Q- Did they hold themselves out in the community and were they generally accepted in the community as husband and wife ?

A- Yes.

10 Q- Any children born as the result of this marriage?

A- Yes.

11 Q- How many?

A- Three.

12 Q- Do you know their names and ages?

A- The oldest is fourteen.

13 Q- Do you know their names, the childrens' names?

A- Well, I just forget them now.

14 Q- Or their ages?

A- Fourteen, thirteen and twelve.

15 Q- Do you know whether they are boys or girls?

A- There is one girl and two boys.

16 Q- Who has had the care and custody of these children?

A- Her mother.

17 Q- That is, Mrs. Franklin?

A- Mrs. Franklin and her mother.

18 Q- And her mother you say?

Mary Pindell

A- Her mother helps.

19 Q- You mean she helps Mrs. Franklin with the children.
Mrs. Franklin lives with her mother?

A- Yes, sir.

20 Q- Now, do you know LeRoy Franklin?

A- Yes, sir.

21 Q- Do you know whether or not he provided a home for
his wife?

A- No, he never did.

22 Q- Where did he live?

A- With his mother.

23 Q- And she has been living with her mother?

A- With her mother all the time.

24 Q- And where has he been living?

A- Been living with his mother.

25 Q- Now, after the marriage and in the year 1924 did you
see him visit her at her mother's?

A- Occasionally I went there several times and he
was there.

26 Q- Now, have you seen him at her house since that time?

A- No.

27 Q- And you have been visiting Mrs. Franklin from that
time up until the present time?

A- Yes.

28 Q- And you never saw him there?

A- No.

Mary Pindell

29 Q- Do you know when he was arrested?

A- Well, he was arrested about three times, to my knowledge.

30 Q- For what?

A- For non-support.

31 Q- Of his wife?

A- Yes.

32 Q- And you have never seen them together since?

A- No.

33 Q- Do you know where he is now?

A- No.

MR. BEERMAN: He resides in Baltimore City at the present time?

A- Yes.

34 Q- Do you know what kind of wife she was?

A- She was a good wife.

35 Q- Chaste do you know?

A- Yes.

36 Q- And was she a good wife and did she take care of her family?

A- She was a good wife and took good care of her family.

37 Q- Affectionate wife to her husband?

A- She sure was an affectionate wife.

38 Q- Takes good care of her children?

Mary Pindell

A- Yes, sir.

39 Q- Do you think she is a fit and proper person to have the custody of those children?

A- Yes, sir.

40 Q- Do you know whether or not Mr. Franklin provided any support for Mrs. Franklin or the children after they were married?

A- Not as I know of.

41 Q- Did Mr. Franklin support his wife and children?

A- He would give her something now and then, but never supported them enough to take care of them.

42 Q- Did you see Mrs. Franklin work to support her children?

A- Yes.

43 Q- And do you know that the mother has been contributing towards the support of those children?

A- Yes, sir.

44 Q- And that has been going on since 1924?

A- 1924.

45 Q- Do you think that Mr. Franklin's staying away from his wife, his desertion of his wife, was his own deliberate and final act?

A- I think so.

46 Q- Is there any hope, in your mind, or expectation of a reconciliation between these two parties?

Mary Pindell

A- No.

47 Q- And you know, you have been visiting there all along?

A- Yes, sir.

48 Q- Has this desertion been continuous and uninterrupted for more than three years back?

A- Yes.

49 Q- Have you seen him at her house since - for more than three years back, since 1929?

A- No.

50 Q- Then it has been continuous and uninterrupted for more than three years?

A- Oh, yes.

MR. MARSHALL: That's all.

MR. BEERMAN: Cross Examination Waived.

QUESTION BY THE EXAMINER:

Do you know or can you state any other matter or thing that may be of benefit or advantage to the parties to this suit or either of them or that may be material to the subject of this your examination or the matters in question between the parties? If so, state the same fully and at large in your answer.

Answer:

No.
Mary Pindell

Ct Ct B 338/1936

Leroy A. Franklin

vs

Beatrice Franklin

& Cross Bill

Plaintiff's Exhibit

Examiner No. 1.

B No 41784

FILED WITH THE EXAMINER

THE 23 DAY OF Sept 1936

GEORGE ARNOLD FRICK
EXAMINER

LEROY A. FRANKLIN,
Complainant

-vs-

BEATRICE FRANKLIN,
Respondent

and

BEATRICE FRANKLIN,
Cross Complainant

-vs-

LEROY A. FRANKLIN,
Cross Respondent

---oOo---

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

THIS STIPULATION, made this ^{10th} day of September, 1936,
by and between the parties above named,

WITNESSETH THAT in the event that a Decree of Divorce be
granted in the afore mentioned case, it is agreed that LeRoy A.
Franklin, Cross Respondent, shall pay unto Beatrice Franklin,
Cross Complainant, the sum of Five (\$5.00) Dollars per week to
be fully used for the use, maintenance and support of the minor
children of the parties and that the said Beatrice Franklin does
hereby release and acquit the said LeRoy A. Franklin of and from
any and all claims for alimony pendente lite, permanent alimony
and Counsel fees.

August Marshall
Solicitor for Cross Complainant.

Beatrice Franklin (SEAL)
Cross Complainant.

Martin Deerna
Solicitor for Cross Respondent.

Leroy A. Franklin (SEAL)
Cross Respondent.

338

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

B 338
1936

LEROY A. FRANKLIN,
Complainant

Vs

BEATRICE FRANKLIN,
Respondent.

And

BEATRICE FRANKLIN,
Cross-Complainant

Vs

LEROY A. FRANKLIN,
Cross-Respondent

ANSWER TO CROSS BILL OF
COMPLAINT.

B 41784

Mr. Clerk:

(4) (5)

Please file, etc.

Martin Beerman

Solicitor for Cross-Respondent,

Service admitted this
day of September, 1936.

August Maslow

Solicitor for Cross-Complainant.

MARTIN BEERMAN
ATTORNEY AT LAW
111 N. CHARLES STREET
BALTIMORE, MD.

FILED

2 September 1936

AND, your Cross-Respondent, having fully answered said Cross
Bill of Complaint, respectfully prays that the same may be dismissed.

AND AS IN DUTY BOUND, etc.

Martin Bereman
Solicitor for Respondent.

Leopold G. Franklin
Cross-Respondent.

B 338
1936

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

LEROY A. FRANKLIN,
Complainant

-VS-

BEATRICE FRANKLIN,
Respondent. ✓

BILL OF COMPLAINT

Mr. Clerk:

Please file, etc.

Martin Beerman

Solicitor for Complainant.

B 41784
4)

MARTIN BEERMAN
ATTORNEY AT LAW
111 N. CHARLES STREET
BALTIMORE, MD.

FILED 17th June 1936

LEROY A. FRANKLIN,
Complainant

VS

BEATRICE FRANKLIN,
Respondent.

IN THE
CIRCUIT COURT OF
BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

Your Orator, Leroy A. Franklin, Complainant, by
Martin Beerman, his Solicitor, respectfully represents as
follows:-

-1- That he was married to the Respondent at Ellicott
City, in the State of Maryland, in the month of April, 1923,
by a duly ordained minister of the Gospel.

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

-3- That two children were born to the parties as the
result of said union, namely, Charles Franklin age 14 and Evelyn
Franklin age 12, both of whom are in the present custody of
the Respondent.

-4- That although your Orator has always conducted him-
self as a kind, affectionate, faithful and dutiful husband
towards the Respondent she, on the other hand, without just
reason or cause, abandoned and deserted your Orator in the
Fall of 1924, and that said abandonment and desertion has
been continuous and uninterrupted since said time and that
said desertion was a deliberate and final act and that there
is no reasonable hope or expectation of a reconcilliation be-
tween the parties.

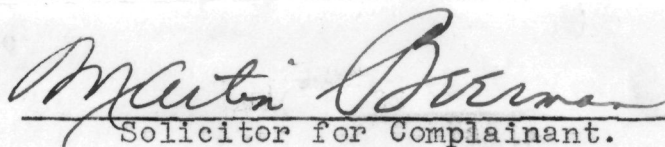
To the end therefore:

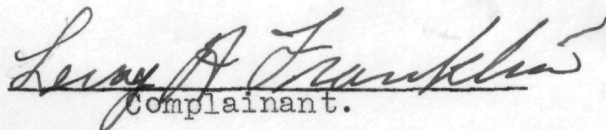
-A- That your Orator may be granted a divorce a vinculo matrimonii from the Respondent, Beatrice Franklin.

-B- That he may be granted such other and further relief as the nature of his cause may be found to require.

May it please your Honor to grant unto your Orator as State's Writ of Subpoena, directed unto the Respondent, Beatrice Franklin, residing at 629 Sterling Street, in the City of Baltimore, State of Maryland, commanding her to be and appear in this Court on some certain day to be named therein, to answer the premises and to abide by such order or orders as may be passed herein.

AND AS IN DUTY BOUND etc.


Solicitor for Complainant.


Complainant.