

B154/18920
In the Circuit Court
No 2 of
Baltimore city

Lloyd Forty

→ USE

Lucia Forty

Bill for
Divorce

Mr. Clerk:

Please file &

E. Jackson

Ad. for P. H.

No 18998

735

W. Muller &

Ed 29 March 1920

491

Ct. Ct. No. 2

154
1920

Docket No. 29

Forty

vs.

Forty

Subpoena to Answer Bill of Complaint

Wm

No. 18998 B

2

Copy = copied

Filed April 11, 1920
Jackson
Solicitor.

9-

Summoned and a copy of the Process left
with the defendant,
Thomas J. M. Pugh
Sheriff

(Ring) 730/20

Fees \$0-50.

EQUITY SUBPOENA
The State of Maryland

To

Cecelia Forty NP 3/30/20
735 St Mulberry, St

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you be in your person before the Circuit Court No. 2 of Baltimore City, at the Court House in said city, on the second Monday of *April*, 192*0*, to answer the complaint of

Royd Fordy

against you in said Court exhibited. HEREOF fail not, as you will answer to the contrary at your peril:

WITNESS, the Honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *8* day of *March*, 192*0*
Issued the *29* day of *March*, in the year 192*0*
John Pleasant
Clerk.

NOTICE TO THE PERSON SUMMONED:

“Personal attendance in Court on the day named in the above Writ is not required; but unless within such number of days thereafter as the law limits, legal defense is made to the above mentioned suit a judgment by default may be entered against you.”

“The Defendant is required to file his Answer or other Defense in the Clerk’s Office within fifteen days after the return day.”

816 Woodyeon St

B 154/1920
In the Circuit Court
no.
Bald City

Lloyd Fortz

vs

Paula Fortz

Answer to bill for divorce
& alimony

Wtr. Clerk please file.

J. Steward Davis

816 Woodyeon St.
No 18998 B
J.

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BALTIMORE, MD.

Ad. 12 April 1920

Serve on
Lloyd Forty
816 Woodysan St

154
1920
B Docket 29
CIRCUIT COURT No. 2

Forty
vs.
Forty

Order Counsel Fee and Alimony.
Pendente Lite
Husband Plaintiff

ORDER
12 April 1920

No. 18998 B.
(4)

Copy = copied

Filed 12 April 1920

copy of the within Order of court served on
Lloyd Forty on the 17th day of April 1920. in presence
of Harry J. Brooks.
Thomas J. M. Sheriff
\$1.00 \$0.50

100 H
125
1920

13

Lloyd Forty

VS.

Cecilia Forty

IN THE

CIRCUIT COURT No 2

OF

BALTIMORE CITY

4/17/1920

March

(Brooks)
TERM, 1920

ORDERED BY THE COURT, this 12th day of April 1920

that the Plaintiff Lloyd Forty

pay to the Defendant Cecilia Forty

the sum of thirty Dollars as Counsel Fee for the

Solicitor of the Defendant, and that he further pay the sum of thirteen

Dollars per week, during the continuance of this suit, to the said Defendant.

Cecilia Forty

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 28th

day of April 1920, provided a copy of this Order be served on the said Plaintiff

Lloyd Forty on or before the 17th

day of April 1920

Walter J. Dawkins

TRUE COPY—TEST:

\$40 per week

No children

Clerk.

B 154/1920
In the Circuit
Court # 2 of

Baltimore city

Lloyd Fortz

vs
Ellis Fortz

Answers to
Petition for
Alimony & Criminal
Fee.

Wm. Lusk,
Plaintiff
E. Jackson

No 1899 S.B. for 1920
5

Ed 28 April 1920

Lloyd Forty

vs.

Cecilia Forty.

In the
Circuit Court No. 2 of Baltimore City.

To the Honorable, the Judge of said Court:

The answer of Lloyd Forty to the petition for alimony pendenti-
lite and Counsel fee of the defendant Cecilia Forty, and the Order of this
Honorable Court thereon, respectfully says:-

I. That the said Lloyd Forty is a man of no means whatever—Having
no property, real personal nor mixed; but Eaks out an existence by selling
fish from a basket upon the streets and alleys in the Baltimore City, and
is thereby unable to comply with the Order Nisi of this Honorable Court
which was passed prior hereto.

Having answered all the material allegations and in due time
your orator prays that the petition of the respondent be dismissed, and
the Order thereon vacated. And as in duty bound. &c.

E. Jackson
.....
Solicitor for the Plaintiff.

State of Maryland(
Baltimore City (

To wit.

I hereby certify that on this the *28th* day of *April* 1920, before me, a subscriber, a Notary Public, of the state of Maryland, in and for Baltimore City aforesaid, personally appeared Lloyd Forty, the ^{*respondent*} ~~petitioner~~ hereto, and made oath in due form of law that the matter contained in the foregoing ^{*answer*} ~~petition~~ is true to the best of his knowledge and belief.

Charles Jennings
Notary Public.

B 154/1920
In the Circuit Court No. 2
of Baltimore city.

Lloyd Forty
vs.
Cecelia Forty.

Answer.

Mr. Clerk:
Please file &c.

C. H. Davis
Solicitor for the Respondent.

No 18998 B

Ad. 13 July 1920

RECEIVED
PAID
DIRECT, YOUR RESPONDENT RESPECTFULLY ADMITS THE FIRST
SECOND, YOUR RESPONDENT RESPECTFULLY ADMITS THE FIRST
THIRD AND FOURTH PARAGRAPHS.
WHEREAS THE RESPONDENT AND PLAINTIFF ON THE ABOVE SET FORTH
HEREIN.

C. H. Davis
Solicitor for the Respondent.

13
6
2

Lloyd Forty .

vs.

Cecelia Forty

In The Circuit Court, no. 2

of

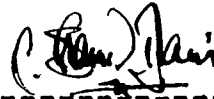
Baltimore City.

To The Honorable, The Judge, of said court:

The answer of your respondent to the bill of divorce exhibited is as follows:

FIRST, Your respondent respectfully admits the first third and fourth paragraphs.

SECOND, Your respondent respectfully denies the ~~first~~ ^{second} paragraph and insists on the strictest legal proof thereof.



Solicitor for Defendant.

Circuit Court No 2.

154
1920

Docket.....

Lloyd Forty

vs.

Beelia Forty

leave

Petition for Leave to Take
Testimony and Order of
Court Thereon.

Mr. Chase
Plaintiff

No. *1899* *J. J. ...*
7

Filed *13 July*, 1920

3/18/74

Lloyd Fortz

vs.

Cecilia Fortz

IN THE
Circuit Court No. 2,
OF
BALTIMORE CITY.

To the Honorable the Judge of the
Circuit Court No. 2 of Baltimore City:

THE PETITION OF Lloyd Fortz

The plaintiff

in this case, respectfully shows that he desire S to take testimony in this case, and respectfully pray S that leave be granted him to do so before one of the Standing Examiners of this Court.

E. Jackson
Solicitor for plaintiff

ORDERED, this 13 day of July, 1912, 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.

Robert F. Stanton

JOHN FORTY, a witness produced on behalf of the Plaintiff, being duly sworn, deposeth and saith as follows:

BY THE EXAMINER:

1Q. State your name, residence and occupation.

A- John Forty, 735 W. Mulberry Street, Baltimore, and I am a Laborer.

2Q. Who are the parties to this suit?

A- They are my father and my mother.

BY MR. JACKSON:

3Q. Are your father and mother now living together?

A- No.

4Q. When did they separate?

A- I could not tell you the year.

5Q. About how long ago did they separate?

A- In the neighborhood of eighteen or twenty years ago.

6Q. Which one left the other?

A- I do not know.

7Q. Did your father leave your mother, or did your mother leave your father?

A- I do not know.

8Q. Did you live with them at the time?

A- I was housekeeping by myself, ~~me~~ and my wife.

9Q. You did not live with them?

A- No.

10Q. You do not know either from your mother or your father or from any one else which one left the other?

John Forty

A- No.

11Q. Did or not your father on a day eighteen or twenty years ago, when he came home from work come to your house and stay all night, and tell you that your mother had left him, and moved out of the house?

A- Yes. My father came to my house, and stayed all night, He came to my house, and made his home there, till he got ready to go.

12Q. Did he not about eighteen or twenty years ago when he came to your house to live, tell you that when he got home, your mother had moved out of the house and left him?

A- I did not part them. I do not recollect what he told me.

13Q. Have they lived together or cohabited with each other since that time?

A- Not as I know of. I do not know that. I do not have to know that.

14Q. How long did he live with you?

A-m I could not even tell you that. I did not trace it.

15Q. You have told all you know?

A- I do not know anything at all about it.

- - - - -

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.

I do not know anything about it.

John Foster

LLOYD FORTM, the Plaintiff produced in his own behalf,
being duly sworn, deposeth and saith as follows:

BY THE EXAMINER:

1Q. State your name, residence and occupation.

A- Lloyd Forty, 816 Woodyear Street, Baltimore, and I am a
Huckster.

2Q. Who are the parties to this suit?

A- I am the Plaintiff, and Cecelia Forty is mywife.

BY MR. JACKSON:

3Q. When, where and by whom were you married?

A- On December 24th, 1874, by a Minister of the Gospel of
the Methodist Church, in Baltimore City. He came to my house
in Cider Alley, where we were married.

4Q. Did you live together as man and wife after the marriage?

A- Yes.

5Q. Were any children born of this marriage?

A- Yes, seventeen children.

6Q. Are they all living?

A- Four are living.

7Q. Are these four children all of them under or over twenty-
one years of age?

A- They are all of age.

8Q. Are you now living with your wife?

A- No. Not for twenty years.

9Q. When did you separate, and which one left the other?

A- She left me on September 15th, 1901.

Lloyd Forty

10Q. Where were you living on September 15th, 1901?

A- On Whatcoat Street, Baltimore.

11Q. What occurred that day?

A- On that morning I went to work, as usual. There was no words or differences between us that day. When I came home from work, with my son Addison, we found my wife had gone, and all the furniture was gone, and the house was empty.

12Q. What did you do then?

A- I went down to my son John's house, and stayed there all night. And I told him that his mother had gone away from the house and had taken all the furniture, and I made arrangements with him that I could stay there until I got another place.

13Q. Have you seen your wife since or had any talk with her since that day?

A- Yes.

14Q. What, if anything, did she say about leaving you?

A- She said she was going to stay away, and that she and her children would not come back to me any more.

15Q. How often have you seen her to talk since she ~~xxx~~ left you twenty years ago?

A- I have never seen her, only when there was a death, or when some of the children were sick.

16Q. Whenever there was a death, or whenever some of the children were sick, and she sent for you, did you have any talk with her about her coming back to you?

A- No.

Lloyd Forty

17Q. Did she ever ask you to take her back?

A- No.

18Q. Have you ever lived with or cohabited with her since she left you about twenty years ago?

A- No, not since she left me.

19Q. Have you been a resident of the City of Baltimore, State of Maryland, for more than two years prior to March 29th, 1920?

A- Yes, all my life.

20Q. Where does your wife live?

A- On Mulberry Street, in the City of Baltimore.

21Q. Has the abandonment of you by your wife continued uninterruptedly for at least three years prior to March 29th, 1920?

A- Yes, nearly twenty years.

22Q. Was her abandonment of you her own deliberate and final act?

A- Yes, it was. She took the furniture and went away, and when I saw her, she said she would not live with me any more.

23Q. Is there any reasonable hope or expectation of a reconciliation?

A- No.

24Q. What was your treatment and conduct towards your wife during the whole of your married life?

A- I treated her as good as a husband could treat a wife. My conduct was that of a faithful husband to her, and a gentleman.

Lloyd Forty

25Q. How did she treat you?

A- Sometimes she treated me good, and sometimes she treated me very bad. our troubles was about another man.

- - - - -

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. Only I know she said
If I would die she
would marry salvage
Parker his
~~John~~ Lloyd forty
year
Just
Alfred Hans