

377 177

In the
Circuit Court No. 2
of
Baltimore City.

~~Mae~~ Townsend Matthews

vs.

Ralph D. Matthews.

Bill for Divorce,
a mensa et thoro.

No 2958513

Mr. Clerk:

Please file.

Hawkins & McMechen
Solicitors for Complainant.

617

HAWKINS & MCMECHEN
ATTORNEYS AND COUNSELLORS AT LAW
14 E. PLEASANT STREET
BALTIMORE, MD.

FILED

5 April 1928

THE DAILY RECORD CO., BALTIMORE, MD.

Mae Townsend Matthews : In the
: :
: Circuit Court No. 2
: :
vs. : of
: :
Ralph D. Matthews : Baltimore City.

To the Honorable, the Judge of said Court:

Your oratrix complaining says:-

-First-

That on the 7th day of August 1926, she was married to her husband, Ralph D. Matthews, in Baltimore City, by Rev. Charles H. Matthews, a regularly ordained minister, and that they resided together as husband and wife, in said city, until the 30th day of January 1928, when he deserted your oratrix, and their infant child.

-Second-

That ever since their marriage as aforesaid, your oratrix has behaved herself as a faithful, chaste and affectionate wife towards her husband, the said Ralph D. Matthews.

-Third-

That her husband is in the possession of steady employment, as a special writer on the staff of the Afro-American, a widely read and profitable newspaper, where he receives a salary of not less than Thirty Dollars (\$30) per week, and because of his special attainments as a writer, he can and does receive additional income from other sources.

-Fourth-

That one child, Ralph D. Jr., has been born from said union.

-Fifth-

That the parties hereto are both residents of Baltimore City, where they have lived for many more than the two years last past.

-Sixth-

That your oratrix is wholly destitute of means of supporting herself during the pendency of this suit, or of defraying the costs and expenses attending the prosecution of the same.

To the end, therefore:

- (1) That your oratrix may be divorced a mensa et thoro from the said Ralph D. Matthews, her husband.
- (2) That your oratrix may have the guardianship and custody of the infant child of said marriage, viz.: the said Ralph D. Jr.
- (3) That your oratrix may be declared to be entitled to receive, by way of alimony, such an allowance out of her said husband's earnings as may be proportioned to the means and station in life of her said husband.
- (4) That, in the meantime, the said Ralph D. Matthews, may be required to pay unto your oratrix a reasonable sum for her support and maintenance during the pendency of this suit, and such sum or sums of money as may enable your oratrix to employ counsel to prosecute this suit and to defray the necessary costs and expenses thereof.
- (5) That your oratrix 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 subpoena, directed to the said Ralph D. Matthews, residing in Baltimore City, commanding him to be and appear in this Court at some certain day, to be named therein, and answer the premises and abide by and perform such decree as may be passed therein.

And as in duty bound, etc.

Wm Townsend Matthews
Complainant.

Hastings & McMechen
Solicitors for Complainant.

State of Maryland, Baltimore City, to wit:

I hereby certify, that on this ^{5th} day of April, nineteen hundred and twenty-eight, before me, the subscriber, a Notary Public of the State of Maryland, in and for Baltimore City aforesaid, personally appeared Mae Townsend Matthews, Complainant, and made oath in due form of law that the foregoing matters and facts set out in the above Bill, are true to the best of her knowledge and belief.


Notary Public.

EQUITY SUBPOENA
The State of Maryland

To

P-284 ✓

Circuit Court No. 2

177
1928

DOCKET No. 37B

MacLaurin & Matthews

vs.

Ralph D. Matthews

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pro

No. 2958513

Copy - 27 47
Copy - 6 11

Filed 9 day of April 1928

25 " " " "
Nauviss McMechen
Solicitor.

B-10

non est
John E. Potee Sheriff

10 April 1928

ISSUED TO May Return Day 1928

Summored and a copy of the Process left
with the Defendant
Lyatt
(4/11/28)
John E. Potee
Sheriff

Dec 10-95

THE SHERRIFF'S OFFICE ON
APR 7 1928 9 19 AM

EQUITY SUBPOENA

The State of Maryland

To

Ralph D Matthews

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 *April*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Mae Spensrud Matthews

against you exhibited in the CIRCUIT COURT NO. 2 OF BALTIMORE CITY.

HEREOF fail not, as you will answer the contrary at your peril:

WITNESS, the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City the *12* day of *March*, 192*8*
Issued the *5* day of *April*, in the year 192*8*

John Pleasant
Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

Circuit Court No. 2

177
192 *8* *B* DOCKET No. 37

Matthews

vs.

Matthews

Amended
SUBPOENA TO ANSWER BILL OF COMPLAINT

Copy

No. _____

Filed _____ day of _____ 192 _____

Solicitor.

EQUITY SUBPOENA

The State of Maryland

To



Ralph D Matthews

15 Aug - 1928

REISSUED TO

September

Return Day, 1928

John Pleasants

True copy test

John Pleasants

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 August, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Mae Townsend Matthews

against you exhibited in the CIRCUIT COURT NO. 2 OF BALTIMORE CITY.

HEREOF fail not, as you will answer the contrary at your peril:

WITNESS, the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City

the 9th day of July, 1928

Issued the 3rd day of August, in the year 1928

John Pleasants Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

TRUE COPY TEST

John Pleasants

SERVE ON

Defendant

B ¹⁷⁷/₁₉₂₈ Docket [✓] *373*

Circuit Court No. 2

Matthews

VS

Matthews

Order Counsel Fee and Alimony
Pendente Lite

ORDER

No. *29585* B.

37

copy-learned

Filed *5 April* 1928

B

Copy of the Within Order of Court Served on Ralph J Matthews on the 11th day of April 1928 in Presence of Joseph E Lyett

John E Potter Sheriff

Dec 10.75

Mae Townsend Matthews

IN THE
CIRCUIT COURT No. 2

vs.

Ralph D. Matthews

OF
BALTIMORE CITY

March TERM, 192*8*

ORDERED BY THE COURT, this *5th* day of *April*, 192*8*,

that the defendant *Ralph D. Matthews*
pay to the plaintiff *Mae Townsend Matthews*
the sum of *Seven*

Dollars per week, during the continuance of this suit as Alimony, *pendente lite*, unless cause to the
contrary be shown on or before the *21st*

day of *April*, 192*8*, provided a copy of this Order be served on the said defendant
Ralph D. Matthews on or before the *11th*

day of *April*, 192*8*, the question of Counsel fee being reserved
for the further determination of this court.

James P. Garter

TRUE COPY—TEST:

Clerk.

*30 words
checked*

Ct. Ct. No. 2 37 B. ¹⁷⁷₁₉₂₈

Mae Townsend Matthews

vs.

Ralph D. Matthews.

Final Order, Counsel Fee and Alimony
Pendente Lite,

No. 29585 B.
257

Filed 20. April 1928

Mae Townsend Matthews

vs.

Ralph D. Matthews

IN THE
CIRCUIT COURT No. 2
OF
BALTIMORE CITY.

The petition for Alimony pendente lite and Counsel fee and the answer thereto in the above entitled cause coming on for final hearing and the respective parties having been heard;

It is Ordered by the Circuit Court No. 2 of Baltimore City this 20th day of April 1928, that the defendant, Ralph D. Matthews pay to the plaintiff, Mae Townsend Matthews

~~the sum of _____ Dollars, as Counsel Fee~~

~~for the Solicitor of the _____ and that he~~

~~further pay~~ the sum of Ten (\$10) Dollars per week,

during the continuance of this suit, to the said plaintiff, Mae Townsend Matthews

as Alimony pendente lite accounting from the _____ day of April, 1928.

Joseph N. Newman

We hereby assent to the passage of the above Order.

Kins & Evans
Solicitors for Defendant.

W. Archie Hawkins
Solicitor for Plaintiff.

IN THE CIRCUIT COURT NO.2
OF
BALTIMORE CITY.

B. 177
1928
MAE TOWNSEND MATTHEWS

VS.

RALPH D. MATTHEWS

RESPONDENT'S ANSWER

Mr. Clerk:

Please file.

Davis & Evans
ATTORNEYS FOR RESPONDENT

No 29585 B.

<67

DAVIS & EVANS
ATTORNEYS AT LAW

Filed 26 - April 1928

MAE TOWNSEND MATTHEWS

:

IN THE CIRCUIT COURT NO.2

VS.

:

OF

RALPH D. MATTHEWS

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the bill of complaint in the above cause respectfully shows:

1. That he neither admits nor denies the allegations contained in the first paragraph of the Complainant's Bill.
2. That he admits the second paragraph of the Complainant's bill.
3. The respondent admits that his income is thirty dollars weekly and further asserts that since the separation he has been contributing ten dollars per week to the support of the petitioner and her infant child, that the petitioner is employed, earning fifteen dollars per week and that as per agreement as filed heretofore in this Court, the respondent will continue to pay ten dollars as alimony pendente lite.
4. That he admits the fourth paragraph of the Complainant's bill.
5. That he admits the fifth paragraph of the Complainant's bill.

AND as in duty bound, etc.

Sawyer Evans

ATTORNEYS FOR RESPONDENT

SERVE ON

Davis & Evans, Sols.

217 Courtland St.

Served admitted June 4 1928

J. Kent Davis

107

37

Circuit Court No. 2

177
1928

DOCKET No. *37 B.*

Mae Townsend Matthews

vs.

Ralph D. Matthews

PETITION AND ORDER TO TAKE
TESTIMONY UNDER 30TH RULE

No. *29585 B*
677

Copy. Lemur

Filed *5 - June* 1928

H-10

*Copy of the within Petition and Order of Court served on
Davis and Evans, Solicitors on the 11th day of
June, 1928, in the presence of August J. Beck
John E. Pollee
Jesse J. J. J.*

Circuit Court No. 2
JUN 6 1928 7 32 PM

Mae Townsend Matthews

vs.

Ralph D. Matthews

IN THE

Circuit Court No. 2

—OF—

BALTIMORE CITY

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

The Plaintiff in this case respectfully shows unto your Honor

That he desires to examine orally, in open Court and in the presence of your Honor, certain witnesses who can testify to the facts and matters relevant to the allegations in the Bill of Complaint filed in this case.

Your Petitioner therefore prays your Honor to pass an order, according to the Statutes for such cases made and provided.

And as in duty bound will ever pray.

Stawrich & McMecheu
Solicitors for Plaintiff

Upon the foregoing Petition and Application it is this 5- day of June

A. D. 1928, Ordered that the Petitioner have leave to take testimony as prayed and that the testimony to be offered be taken as required by the 30th Rule of this Court. And it is further Ordered that a copy of this Petition and Order be served on the defendant

or his Solicitor, on or before the 11- day of June, 1928.

✓ *James P. Foster*

177

1928

In the
Circuit Court No. 2
of
Baltimore City.

34 B,

Mae Townsend Matthews

vs.

Ralph D. Matthews/

628 N. Eutaw St.

Amended Bill of Complaint.

Mr. Clerk;

Please file.

~~N. Ashbie Hawkins~~
Solicitor for Complainant.

No 29585 B.

L 87

HAWKINS & McMECHEN
ATTORNEYS AND COUNSELLORS AT LAW
14 E. PLEASANT STREET
BALTIMORE, MD.

FILED

3 - August 1928

Mae Townsend Matthews	:	In the
	:	
	:	Circuit Court No. 2
vs.	:	
	:	of
	:	
Ralph D. Matthews	:	Baltimore City.
	:	

To the Honorable, the Judge of said Court:

Your Oratrix, complaining, says:

-First-

That heretofore, to wit, on or about the 12th day of April, 1928, she filed her Bill of Complaint in this Honorable Court against her husband, Ralph D. Matthews of Baltimore City, praying amongst other things, for a decree of divorce a mensa et thoro from the said Ralph D. Matthews, as in said bill is particularly set forth, to which the defendant answered and other proceedings were had, as by the same proceedings, now in this Court, will appear.

-Second-

That your Oratrix has lately discovered, and now charges, by way of amendment to her aforesaid Bill of Complaint, that the said Ralph D. Matthews, prior and subsequent to the date of filing her said Bill of Complaint, has committed the crime of adultery with one Letha L. Bush, and other lewd and abandoned women, whose names are un-known to your oratrix, ~~who are now living in the same party to this suit~~

To the end, therefore:

- (1) That the said Ralph D. Matthews may answer this amendment.
- (2) That said Ralph D. Matthews may answer, as well the matters charged in the original Bill of Complaint, as in this amended bill.
- (3) That your Oratrix 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 subpoena, directed to the said Ralph D. Matthews, residing in Baltimore City, commanding him to be and appear in this Court at some certain day, to be named therein, and answer the premises and abide by and perform such decree as may be passed therein.

And as in duty bound, etc.

Mae Townsend Matthews
Complainant.

M. Ashbie Hawkins
Solicitor for Complainant.

Leave is hereby granted to file the above Amended Bill,

August 3rd 1928

Charles F. Stein
✓

RECEIVED AT
THE SHERIFFS OFFICE ON

AUG 15 1928 11 23 AM

P459
Circuit Court No. 2

¹⁷⁷
1928 B DOCKET No. 37

Matthews

vs.

Matthews

^{Amended}
SUBPOENA TO ANSWER BILL OF COMPLAINT

PW

No. 29585B

L 97 1107

Copy - Garcia
Copy - Lopez

Filed 13 day of Aug 1928

" W. Shibe " ^{Sept} ₁₁ " ¹⁹²⁸
Solicitor.

P

Now Est John E. Poteo Sheriff

REISSUED TO 15- Aug 1928
September 15th 1928
John Poteo
CLERK

Now Est John E. Poteo Sheriff

RECEIVED
THE SHERIFF

AUG 15 1928

EQUITY SUBPOENA

The State of Maryland

To

Ralph D. Matthews

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 *August*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

Mae Townsend Matthews

against you exhibited in the CIRCUIT COURT NO. 2 OF BALTIMORE CITY.

HEREOF fail not, as you will answer the contrary at your peril:

WITNESS, the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City the *9-* day of *July*, 192 *8*
Issued the *3-* day of *August*, in the year 192 *8*

John Pleasant

Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

IN THE CIRCUIT COURT NO. 2

37/13 OF 177/1928

BALTIMORE CITY.

LAT TOWNSEND MATTHEWS

VS.

RALPH MATTHEWS

RESPONDENT'S ANSWER

Mr. Clerk:

Please file.

Sheward Davis
ATTORNEY FOR RESPONDENT

No 29585 B
2117

DAVIS & EVANS
ATTORNEYS AT LAW

Filed 14 November 1928

MAE TOWNSEND MATTHEWS, : IN THE CIRCUIT COURT NO.2

VS. : OF

RALPH MATTHEWS : BALTIMORE CITY

The respondent answering the original bill filed in the above complaint respectfully says:

1. That he neither admits nor denies the allegation contained in the first paragraph of the Bill of Complaint.
2. That he admits the allegations contained in the second paragraph of the Bill of Complaint.
3. That he admits that at the time of filing, he was earning thirty dollars per week. He further avers that an agreement has been arrived at in reference to alimony pendente lite and counsel fee between counsel for both parties.
4. He admits the allegations contained in the fourth paragraph of the Bill of Complaint.
5. He admits the allegations contained in the fifth paragraph of the Bill of Complaint,
6. Averment in paragraph three of this answer covers answer to paragraph six in original bill of complaint.
7. That your respondent further answering the Amended Bill of Complaint as filed by complainant, respectfully says:
That he admits the averment in paragraph one of the Amended Bill.
That he neither admits nor denies the allegation as

contained in paragraph two of the amended bill and insists on the strictest proof thereon.

Stewart Laves
ATTORNEY FOR RESPONDENT

Circuit Court No. 2

177
1928

DOCKET.....

No. 37 B

May Townsend Matthews

vs.

Ralph D. Matthews

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

Frick

No. 29585 B.
L127

Filed 14 - November 1928

May Townsend Matthews

vs.

Ralph D. Matthews

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 May Townsend Matthews, plaintiff

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.

M. Annie Howard
Solicitor for Plaintiff

ORDERED, this 14 day of November 1928, 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.

Joseph N. Howard

DOCKET R. 177/1928

IN THE CIRCUIT COURT No. 2

..... Mae Townsend Matthews

vs.

..... Ralph D. Matthews

DEPOSITIONS

No. 29585 B.
1928

PLAINTIFF'S COSTS

Examiner \$

Copies

Notices

Sheriff

Stenographer

..... \$

DEFENDANT'S COSTS

Examiner \$

Copies

Notices

Sheriff

Stenographer

..... \$

GEORGE ARNOLD FRICK, Examiner

Filed 4 day of Dec 1928

.....
Mae Townsend Matthews
.....

vs.

Ralph D. Matthews
.....
.....

In the Circuit Court No. 2
OF BALTIMORE CITY

.....
The above entitled cause being at issue
.....

and notice having been given me by the Solicitor for the Plaintiff
of a desire to take testimony in the same, I, GEORGE ARNOLD FRICK, one
of the Standing Examiners of the Circuit Courts of Baltimore City, under and by
virtue of an order of the above named Circuit Court, passed in said cause on the
14th day of November, 19²⁸, met on
the 17th day of November in the year nineteen
hundred and twenty-eight, at my office, in the City of Baltimore, in the
State of Maryland, and assigned the 19th day of November
in the same year at two o'clock in the afternoon and the
office of the Examiner, in the City and State
aforesaid, as the time and place for such examination of witnesses in said cause;
at which last mentioned time and place I attended, due notice of such meeting
having been given, and proceeded in the presence of the Solicitor of the
Plaintiff to take the following depositions, that
is to say:

Testimony taken at the office of George Arnold Frick, 20 East Lexington Street, on November 19, 1928, at two o'clock in the afternoon.

Present: W. Ashbie Hawkins, Counsel for the Plaintiff.

Thereupon:

MAE TOWNSEND MATTHEWS, the Plaintiff, produced as a witness on her own behalf, being first duly sworn, deposeseth and saith as follows - that is to say -

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Mae Townsend Matthews, 906 Madison Avenue, Stenographer.

2 Q- Are you the Plaintiff in this proceeding?

A- Yes.

3 Q- How long have you known the Defendant, your husband?

A- Five years.

BY MR. HAWKINS:

4 Q- When, where and by whom were you married?

A- August 7, 1926, by the Reverend Matthews, 906 Madison Avenue, Baltimore, Maryland.

Mae Townsend Matthews

5 Q- What sort of a minister is he ?

A- Methodist Episcopal.

6 Q- What relation is he to Ralph D. Matthews?

A- His father.

7 Q- In the home in which you live at the time of your marriage--you are now living at whose home?

A- Ralph's father.

8 Q- Are you and Ralph living together now?

A- No, sir.

9 Q- Tell the Court why you are not living together?

A- Because he left me on the 30th of January, 1927.

10 Q- Did you give him any cause for leaving you?

A- No, I did not.

11 Q- Do you know what excuse he had to give for leaving you?

A- I do not know that he gave any excuse other that he was interested in this woman named Letha L. Bush and think that she encouraged him.

12 Q- Where was he working at the time ?

A- In the office of the Afro-American.

13 Q- In what capacity?

A- City Editor.

14 Q- Where was Miss Bush working?

A- Afro-American.

15 Q- In the same office with him?

A- Yes, sir.

Mae Townsend Matthews

16 Q- Look at this paper I am handing you. What is it?

A- It is a letter to my husband from this woman Bush.

17 Q- Will you tell the Court where you got this letter?

A- From his pocket. He rested his coat on the chair and this letter was sticking out of the pocket, I saw it and took it out, but I did not expect to find anything like that.

18 Q- Do you know when you found this letter?

A- About the first week in December, 1928, ^{no,} that letter was in December, 1927, because this is 1928 now.

NOTE: The above mentioned letter is now filed with the Examiner Marked Plaintiff's Exhibit Examiner No. 1.

19 Q- During your married life what was your husband's conduct towards you?

A- Up to the time he became interested in this other woman he was a model husband. After he became interested in her he just seemed changed altogether..

20 Q- Did he provide for you?

A- Yes, always provided for me.

21 Q- And treated you otherwise ?

A- Yes, Except preceeding the two months that he left, he began to be a changed man and did not mind showing it. He never did me any harm or hurt me but just by the kittle things that he would say and do. He stayed out until one and two o'clock in the morning. He never did those things before.

Mae Townsend Matthews

22 Q- Where did he go to live after he left you?

A- Over to Washington.

23 Q- Tell us what your treatment of him was during your married life?

A- I think I always treated him the way he should have been treated because he never gave me any cause to treat him otherwise heretofore and the only cross words we have ever had was about this one woman and we never had anything to fuss about and of course when this came up it was something that I had to talk to him about.

24 Q- Were you faithful to your marriage vows?

A- Yes.

25 Q- Were you dutiful in every respect?

A- Yes.

26 Q- How many children have you?

A- One.

27 Q- How old is he?

A- Seventeen months.

28 Q- If the Court should award you the custody of this child are you able to take care of him?

A- Not by myself.

29 Q- What do you mean, not by yourself?

A- I mean this, that I do not make enough money to take care of myself and the baby too, but with some assistance from him, I do not see why I should not be able to make it.

30 Q- Have you a home where you can take your child?

Mae Townsend Matthews

A- Yes, where I am living now.

31 Q- What was your husband making in Baltimore?

A- Thirty Dollars a week.

32 Q- Do you know what he is making now?

A- No, I do not.

33 Q- He could have stayed at the AfroAmerican if he wanted to?

A- Yes.

34 Q- Did he get anything less in Washington?

A- I do not think so. I do not think he would have gone to Washington if he were to receive less money.

35 Q- How long have you been living in Baltimore, both of you?

A- I have lived in Maryland for ten years and then Mr. Matthews was born here, I am sure he was.

36 Q- Do you desire the custody of this child?

A- I certainly do.

37 Q- When you got after him for this relationship with this certain woman, what did he say?

A- At first he denied 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: But this relationship was something that he would not try to cover up one time or the other. Both of them were very brazen though they never admitted it they never denied it and he just kept it up as he did heretofore and he never stopped but kept it up until he left for Washington.

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.
Thee Townsend Matthews

WILLIAM N. JONES, produced as a witness on behalf of the Plaintiff, being first duly sworn, deposes and saith as follows - that is to say -

BY THE EXAMINER:

- 1 Q- State your name, residence and occupation?
A- William N. Jones, 421 North Calhoun Street, Managing Editor of the Afro-American.
- 2 Q- Do you know the parties to this suit?
A- I do.
- 3 Q- How long have you known them?
A- I have known them three years.

BY MR. HAWKINS:

- 4 Q- Were you present at the marriage ceremony?
A- I was.
- 5 Q- Where did they live during their marriage?
A- Madison Avenue, this City, Baltimore.
- 6 Q- Are they living together now?
A- They are not.
- 7 Q- Do you know what was the cause of the separation between them?
A- I do.
- 8 Q- Will you state it briefly?
A- For about a year after the marriage Matthews was working at the office of the Afro-American as City Editor.

William N. Jones

At the time he was employed by the managing editor of the Afro-American/^{he} began the connection, that is keeping company with a young woman in the same office of the Afro-American.

9 Q- Do you know the name of the young woman?

A- Letha L. Bush. At the time she was/^a stenographer in my department.

10 Q- Will you tell about what time this was?

A- It began as I remember about eight months after the marriage. I do not recall the exact date of the marriage.

11 Q- They were married on or about August, 1926?

A- I recall it was in the month of August, 1926, when the wedding took place.

12 Q- When was it that he began to pay his attentions to this young woman?

A- I noticed it about January, 1927.

13 Q- What did you notice about Mr. Matthews?

A- Well, I first notice that they went home together, I happened to go to a restaurant in the afternoon and saw them together on two or three afternoons, and having some interest in Mr. Matthews, spoke to him about it and I found out afterwards after that that the same things happened until on one occasion it became my duty as Managing Editor in the office to make certain rules and regulations with reference to things that they did in the

William N. Jones

office and that grew out of relations as I saw them in the office, and my official duty was merely to protect the office at that time and then I told them that they could not spend their time together in the office and I told him about it and told him that as City Editor he should try to take interest in the doings of the office but after all of that he failed to do these things that I told him about and on several occasions I saw him with this woman on the street and saw them together in the restuarant and saw them together one night, late.

14 Q- How long did they keep up this relationship to your knowledge?

A- To my personal knowledge I saw them together until right before he left for Washington about two months ago.

15 Q- Up until two months ago?

A- Yes, sir.

16 Q- What is he doing now?

A- He is still in the newspaper business working on the Washington Tribune.

17 Q- Do you know what salary he makes?

A- I understand that he makes thirty-five Dollars a week.

18 Q- What was he making when he worked for the Afro-American?

A- Thirty-two-fifty, that was his basic salary.

William M. Jones.

19 Q- Do you know how many children, if any, that they had?

A- One child, Ralph Jr.

20 Q- Did you ever have occasion to visit their home?

A- Very often.

21 Q- Did you notice how he treated his wife otherwise his relations with this woman?

A- His treatment was of a model husband.

22 Q- Did you observe how she treated him?

A- From what I know it was as model as I have ever known a wife's relationship to be.

23 Q- Dutiful wife?

A- Yes, sir.

24 Q- Was she a faithful wife?

A- Yes, sir.

25 Q- Were there any children?

A- One child.

26 Q- How old is the child, do you know?

A- More than a year old.

27 Q- Boy or girl?

A- Boy.

28 Q- How long have they lived in Maryland to your knowledge?

A- To my personal knowledge I could not say more than six years they were here, both of them, when I came here I employed Matthews when he was just out of school and one

William N. Jones

of the first ones.

29 Q- Mr. Jones, will you look at this paper I hand you and tell us whose handwriting that is ?

A- Letha Bush's.

30 Q- The woman you mentioned sometime ago?

A- Yes.

31 Q- To whom is it addressed?

A- To Dear Ralph, I know her writing from the fact that she was my stenographer at the time that she was employed at the office.

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.
William N. Jones

No other witnesses being named or produced before me, I then at the request of the Solicitor.....of the Plaintiff..... closed the depositions taken in said cause, and now return them closed under my hand and seal on this fourth.....day of December.....in the year of our Lord nineteen hundred twenty-eight.....at the City of Baltimore, in the State of Maryland.

George Arnold Frick
Examiner. SEAL

There ~~are~~ is one..... Exhibits with these depositions, to wit:
Plaintiff's Exhibit Examiner No. 1......

Defendant's..... Exhibit.....

George Arnold Frick
Examiner.

I, GEORGE ARNOLD FRICK, the Examiner before whom the foregoing depositions were taken, do hereby certify that I was employed in assigning a day and taking the said depositions upon two.....days, on both..... of which I was employed by the plaintiff....., and on none..... by the defendant.....

George Arnold Frick
Examiner.

Let. Ct. No. 2 B/177
B/1928

Matthews
vs
Matthews

Plaintiff's Exhibit,
Examiner No. 1

Filed with the Examiner
the 19th day of Nov 1928
George Arnold Frick
Examiner

No. 29585B
<147

Ed 4 - December 1928

HEART  AMERICAN

BALTIMORE, MD.

The Final Decision

86378
19.⁶¹

11

8659

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50591

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30757

729657

14828

BIGGEST WEEKLY NEWSPAPER IN THE
WORLD IN ITS OWN PLANT, EMPLOYING A
COMPLETE RACE STAFF OF 26 WORKERS

WATSON, AMERICA'S BEST KNOWN CAR-
TOONIST, TELLS WEEK'S STORY IN
THE AFRO

THE AFRO-AMERICAN

BALTIMORE, MD.
628 N. EUTAW, ST.

WM. N. JONES
Managing Editor

PHONES
VERNON 6016-6017

Dear Ralph:

I hasten to grant your desire and hope
as expressed to Jones. He did not tell me what
you had said and you weren't man enough to.

Something told me to read that letter and I
did. Would to God I had before Saturday
eve.

You expressed the desire and hope that
I would find someone else, which would, of
course, give you cause to sever all con-
nections with me, all for Mae's sake.

No doubt you went away with the hope
that I would. I didn't though, and
perhaps never will.

THE AFRO-AMERICAN

BALTIMORE, MD.
623 N. EUTAW ST.

WM. N. JONES
Managing Editor

PHONES
VERNON 6016-6017

2.

You fear to hurt my feelings, that is why you haven't ~~been~~ told me. That's why you stick to me. But you're hurting me more by doing that than by making known your inward desires and wishes. You have actually been deceiving me.

You don't want to hurt Mae, that is why you have hoped I'd do something to make it justifiable for you to give me up, ~~or~~ Since you don't want to hurt her, you must love her. Your coming back to her is another indication of your love. Your love for the baby is another.

THE AFRO-AMERICAN

BALTIMORE, MD.
628 N. EUTAW ST.

WM. N. JONES
Managing Editor

PHONES
VERNON 6016-6017

- 3 -

I can see everything very clearly now that I know your inward desires and wishes. Why haven't you told me before? Hurting me would have been a small matter, I'm sorry you didn't. I've thought all these things, but you've denied them. But after seeing them in black and white, I am thoroughly convinced that it is Mae and the baby ^{and your parents} you want most and not me. And far be it from me to deprive you of them. Thank God I know the truth now, as you told someone else ^(Jones) from your own heart.

THE AFRO-AMERICAN

BALTIMORE, MD.
628 N. EUTAW, ST.

WM. N. JONES
Managing Editor

PHONES
VERNON 6016-6017

- 4 -

Too, Ralph, you said "we quarrelled.
I had thought it was all over." You
meant hoped, wished, prayed. Then,
"I don't know why she came to the sta-
tion." I glean from that that you
were sorry to see me, in fact, I know
it. You pretended you were glad. Deceit.
What a fool I've been!
Oh, well, it's good I found out
your inward desires and wishes, as
it always gives me pleasure to
grant you what you most desire,
and I trust and hope you'll
now be happy, which too will

THE AFRO-AMERICAN

BALTIMORE, MD.
623 N. EUTAW, ST.,

WM. N. JONES
Managing Editor

PHONES
VERNON 6016-6017

- 5 -

make me happy.

But this is The End, Ralph.

I know not what I shall do. I
care not. I shall merely exist.

I shall live on the memories of
the past eight months. After to-
day I shall just live, with no
hope for the future.

I trust this will give you
great relief and happiness,
my dear. You deserve it. Had
you only told me before! My
feelings are nothing to your happiness.

THE AFRO-AMERICAN

BALTIMORE, MD.
628 N. EUTAW, ST.,

WM. N. JONES
Managing Editor

PHONES
VERNON 6016-6017

- 6 -

Please tell Mae for me that I
do it for her sake, as well as for
yours.

May God bless and take care of
you, Mae and the dear little baby,
and may you all be happy.

Thank you for at least giving
me a few months of happiness.
I shall never know such again.
I shall not even look for it, for
there is none for me now.

I shall continue to love you and
watch you rise in life to the greatest
heights. You have a wonderful career

THE AFRO-AMERICAN

BALTIMORE, MD.
628 N. EUTAW. ST.

WM. N. JONES
Managing Editor

PHONES
VERNON 8016-8017

-7-

before you. I shall watch closely
everything you do, and shall get
the little happiness I do get from
that. Give the world the best in you.

May you be as good and true to
Mae as I feel you have been to me.
Make her happy. God will reward
you. This is my only request.

Goodbye, Ralph, until we meet
on the other side.

Brokenhearted, but still happy
if this decision will make you,
Mae and the baby happy, also your
dear parents. As ever,
Letha.

Circuit Court No. 2

179

1928

DOCKET 37 No.

Mae Townsend Matthews

vs.

Ralph D. Matthews.

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file:

W. Asbie Hawkins

Solicitor for Plaintiff.

No. 29585 B.

< 15 >

Filed 18. December 1928

Mae Townsend Matthews

vs.

Ralph D. Matthews

IN THE

Circuit Court No. 2

-OF-

BALTIMORE CITY

September TERM, 1923.

To the Honorable

Joseph C. Ulman

Judge of the said Court:

The above cause is respectfully submitted for decree and the 41st General Equity Rule is hereby waived.

W. Arbie Hawkins

Solicitor for Plaintiff,

J. Stewart Davis

Solicitor for Defendant.

Circuit Court No. 2

177
1928

B

Docket No. 37

Matthews

vs.

Matthews

**Order of Reference
and Report**

LYONS

No. 29585B
416-217

Order Filed 18- day of Dec. 1928

Report Filed 27- day of Feby 1929

Mae Townsend Matthews
vs.
Ralph L. Matthews

IN THE
Circuit Court No. 2

OF
BALTIMORE CITY

November TERM, 192*8*

This case being submitted, without argument, it is ordered by the Court, this *18-*
day of *December*, 192*8*, that the same be and is hereby referred to
Wm P Lyons, Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.

Joseph N. Helman

Report of Auditor and Master:

Bill for divorce a mensa et thoro filed by the wife against her
husband on the ground of abandonment. Code Art. 16; Sec. 37-42.

Defendant summoned and answered.

Amended bill for divorce a vinculo matrimonii filed ^{by leave of Court} by the wife
against her husband on the ground of adultery. Code Art. 16; Sec. 37-42.

Defendant summoned and answered amended bill.

Plaintiff's residence in Baltimore City for more than two years
prior to the filing of the bill proved.

The marriage proved.

Adultery proved.

Case made for awarding the guardianship and custody of the minor
child of the parties to the plaintiff and charging the defendant with
the maintenance and support of said child.

Thirty days have elapsed since the filing of the bill.

Case submitted for decree and 41st General Equity Rule waived.

Case ready for decree.

William P. Lyons
Auditor and Master.

February 27, 1929.

B177/1929

In the
Circuit Court No. 2
of
Baltimore City.

Mae Townsend Matthews

vs.

Ralph D. Matthews.

Petition to take Additional
Testimony.

Mr. Clerk;
please file.

W. Ashbie Hawkins
Solicitor for Petitioner.

Fuch

No 29585B.
L177

HAWKINS & McMECHEN
ATTORNEYS AND COUNSELLORS AT LAW
14 E. PLEASANT STREET
BALTIMORE, MD.

FILED

3rd January 1929

THE DAILY RECORD CO., BALTIMORE, MD.

Mae Townsend Matthews : In the
: Circuit Court No. 2
: of
vs. :
: Baltimore City.
Ralph D. Matthews :

To the Honorable, the Judge of said Court:

Your Oratrix complaining, says:-

-First-

That heretofore to wit, on or about the 12th day of April 1928, she filed her Bill of Complaint in this Honorable Court against her husband, Ralph D. Matthews, praying for a divorce A Mensa Et Thora, and that later she was granted an order permitting her to file an Amended Bill, praying for a divorce A Vinculo Matrimonii.

-Second-

That in due time, the testimony was taken in said case and sent to Honorable William P. Lyons, Master in Chancery.

-Third-

That the said Master in Chancery reports that the testimony is not sufficient to sustain the allegations in the Bill of Complaint.

WHEREFORE, your petitioner prays that the testimony in said case may be remanded to the Examiner, to the end, that additional testimony be taken to sustain the allegations in her aforesaid Amended Bill of Complaint.

And as in duty bound, etc.

Mae Townsend Matthews
Petitioner.

W. B. Harris
Solicitor for Petitioner.

State of Maryland, ~~Ba~~ltimore City, to wit:

I hereby certify, that on this 3rd day of January, 1929, before me, the subscriber, a Notary Public of the State of Maryland, in and for Baltimore City aforesaid, personally appeared Mae Townsend Matthews, Petitioner, and made oath in due form of law that the foregoing matters and facts are true to the best of her knowledge and belief.


Notary Public.

Ordered by The Circuit Court No. 2 of Baltimore City, this 3rd
— day of January 1929, upon the foregoing Petition and Affidavit, that the testimony in this cause be and the same is hereby remanded to the Examiner as therein prayed.



Ct. Ct. No. 2

177
~~416~~

1928 B DOCKET No. 37

Mae Townsend Matthews

vs.

-- Ralph D. Matthews.

ORDER FOR APPEARANCE

Frank

No.

29585B
2187

Filed

14-

day of

Febry

, 1929

Mae Townsend Matthews

vs.

Ralph D. Matthews.

In the Circuit Court No. 2
of Baltimore City

-- January----- TERM, 1929

MR. CLERK:

PLEASE ENTER MY APPEARANCE FOR DEFENDANT.

Ralph D. Matthews,

Ralph D. Matthews
Defendant.

Roy D. BMD
Defendant's Solicitor

DOCKET B. 177/1929

IN THE CIRCUIT COURT No. 2

May Townsend Matthews

vs.

Ralph D. Matthews

ADDITIONAL DEPOSITIONS

No. 29585/3
2193

PLAINTIFF'S COSTS

Examiner	\$.....
Copies
Notices
Sheriff
Stenographer
<hr/>	
	\$

DEFENDANT'S COSTS

Examiner	\$.....
Copies
Notices
Sheriff
Stenographer
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	\$

GEORGE ARNOLD FRICK, Examiner

Filed 15 - day of Feby 1929

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In the Circuit Court No. 2
OF BALTIMORE CITY

The above entitled cause being at issue, and testimony having
heretofore been taken and duly returned into Court,
and notice having been given me by the Solicitor for the Plaintiff
additional
of a desire to take testimony in the same, I, GEORGE ARNOLD FRICK, one
of the Standing Examiners of the Circuit Courts of Baltimore City, under and by
virtue of an order of the above named Circuit Court, passed in said cause on the
third day of January, 19²⁹, met on
the 11th day of February in the year nineteen
hundred and twenty-nine, at my office, in the City of Baltimore, in the
State of Maryland, and assigned the 12th day of February
in the same year at 10.30 o'clock in the fore - noon and the
office of the Examiner, in the City and State
aforesaid, as the time and place for such examination of witnesses in said cause;
at which last mentioned time and place I attended, due notice of such meeting
having been given, and proceeded in the presence of the Solicitor^s of the
respective parties to take the following depositions, that
is to say:

TESTIMONY taken at the office of George Arnold Frick, the Examiner, on Tuesday, February 12th, 1929, at ten-thirty in the morning.

Present: W. Ashbie Hawkins, Counsel for the Plaintiff.

Thereupon:

GARLAND MACKEY, produced as a witness on behalf of the Plaintiff, being first duly sworn, deposes and saith as follows - that is to say -

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Garland Mackey, 1205 Clendenin Avenue, Newspaper man.

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

A- Yes.

3 Q- How long have you known them?

A- I know both of them about six years.

BY MR. HAWKINS:

4 Q- Do you know anything about them during their married life together?

A- Yes, I know that they lived with his people on Madison Avenue and for anything else, that is all.

Garland Mackey

5 Q- You never visited them?

A- Yes, I only called to see Matthews occasionally.

6 Q- At the time that they were living together, where was Mr. Matthews working?

A- Matthers worked with the Afro-American.

7 Q- Where were you working?

A- Part of the time I was with the Afro-American then I was with the Herald Commerce.

8 Q- Both newspapers?

A- Yes.

9 Q- Did you know Matthews well?

A- Yes, I know him very well.

10 Q- Do you know anything about his relations, at that time, with a young woman he was working with at the Afro-American?

A- Well, there was a young woman working there at that time, and as far as their relations was concerned, I could not say.

11 Q- Did you ever talk to Matthews, himself, about it?

A- Some years later, about a year later, he spoke to me about it.

12 Q- Well, give briefly the conversation you had with him?

A- Well, he told me in a confidential manner that he thought this girl was pregnant and he asked me what was the best thing to do and I told him the best thing to do was

Garland Mackey

to see a doctor.

13 Q- Did he indicate to you that he was responsible for that condition?

A- Well, only from his conversation--of course he is a man and if he weren't responsible, of course, I doubt if he would have brought it up to me.

14 Q- At the time that he had this conversation with you, was he married to his present wife?

A- Yes, he was married.

15 Q- Have you talked with him on this subject anytime since?

A- No, soon after that Matthews went to Washington and I have not been able to see him except just in his office in Washington.

16 Q- What is this girl's name, if you know?

A- I don't remember his first name. Her last name was Bush.

17 Q- And she was the one that was working at the Afro-American?

A- Yes.

18 Q- He admitted to you in so many words that he was responsible for the pregnant condition?

A- Yes.

19 Q- And that was the same time that he was married to his present wife?

A- Yes.

Garland Mackey

20 Q- Did he ever admit to you in any way other, that he was intimate with this woman?

A- I could not say he did, because I met him on several occasions and we were in no position to talk of such a thing, that is, in his office and public places.


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. Garland Mackey

No other witnesses being named or produced before me, I then at the request of the Solicitors of the respective parties closed the depositions taken in said cause, and now return them closed under my hand and seal on this 15th day of February in the year of our Lord nineteen hundred twenty-nine at the City of Baltimore, in the State of Maryland.

George Arnold Frick
Examiner. 

There are no Exhibits with these depositions, to wit:
Plaintiff's Exhibit

Defendant's Exhibit

George Arnold Frick
Examiner.

I, GEORGE ARNOLD FRICK, the Examiner before whom the foregoing depositions were taken, do hereby certify that I was employed in assigning a day and taking the said ^{additional} depositions upon two days, on both of which I was employed by the plaintiff and on none by the defendant.

George Arnold Frick
Examiner.

Circuit Court No. 2

177
1928

DOCKET No. 37 B

Mae Townsend Matthews

vs.

Ralph Matthews.

Lyons / **SUBMISSION FOR DECREE.**

Mr. Clerk,

Please file:

W. Archie Howard Rice
Solicitor for Plaintiff.

No. 29585 B
< 20 >

Filed 26 - February 1929

Mae Townsend Matthews

IN THE

Circuit Court No. 2

vs.

—OF—

Ralph Matthews.

BALTIMORE CITY

January--

TERM, 1929.

To the Honorable

The

Judge of the said Court:

The above cause is respectfully submitted

for decree and the 41st General Equity Rule is hereby waived.

M. Arbia Hawkins

Solicitor for Plaintiff,

R. A. Bond

Solicitor for Defendant.

Circuit Court No. 2

B-177
1928 No. Docket

MAE TOWNSEND MATTHEWS

vs.

RALPH D. MATTHEWS

DECREE OF DIVORCE

R

No. 29585 B.
< 2 2 >

Copy 222 bound 2

Filed 27 February, 1929

The within is a proper decree
to be passed in this case.

William P. Lyons
Auditor and Master.

DECREE OF DIVORCE.

MAE TOWNSEND MATTHEWS

vs.

RALPH D. MATTHEWS

IN THE

Circuit Court No. 2,

OF

BALTIMORE CITY

January Term, 1929

This cause standing ready for hearing and being duly submitted, the proceedings were by the Court read and considered.

It is thereupon, this 27 day of February, Anno Domini, one thousand nine hundred and twenty nine by the CIRCUIT COURT No. 2 OF BALTIMORE CITY, Adjudged, Ordered and Decreed, that the said MAE TOWNSEND MATTHEWS,

the above named complainant be, and she is hereby DIVORCED A VINCULO MATRIMONII, from the defendant, RALPH D. MATTHEWS.

AND it is further ordered that the guardianship and custody of RALPH D. MATTHEWS, JR., minor child of the parties, be and they are hereby awarded to the Complainant, MAE TOWNSEND MATTHEWS, and the Defendant, RALPH D. MATTHEWS, be and he is hereby charged with the maintenance and support of said child and shall pay therefor and as alimony to the Complainant, the sum of ten dollars per week, all subject to the further order of this Court.

And it is further Ordered, that the said Defendant, RALPH D. MATTHEWS, pay the cost of this proceeding.

Signature of John Pleasants, Clerk of the Circuit Court No. 2 of Baltimore City.

I, JOHN PLEASANTS, Clerk of the Circuit Court No. 2 of Baltimore City, do hereby certify that the above is a true copy of the decree taken from the record of proceedings in said cause.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of the said Court, this day of 1929

SERVE ON

Ralph D. Matthews,

628 N. Eutaw Street, City.

37B-177/1928

Ct. Ct. No. 2 B 192

Mae Townsend Matthews

vs.

Ralph D. Matthews.

628 N Eutaw St

ORDER OF COURT NISI
For Contempt

ORDER

No. 29585 B
<23>

Copy-Copied

Filed 12-June 1929

10

Copy of the within Order of Court served
on Ralph D. Matthews on the 17th day
of June 1929 in Presence of August J. Bichy
John E. Potee
New York Sheriff

JUN 17 1929 10 37

Mae Townsend Matthews
vs.
Ralph D. Matthews

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

Ordered by the Circuit Court No. 2 of Baltimore City this 12th day of
June 1929, that the said Ralph D. Matthews
appear before this Court in person, on the 21st day of June, 1929,
at 10 o'clock A. M., and then and there show cause, if any he may have, why he should not be
punished for contempt of this Honorable Court in not obeying the Order of this Court passed
on the 27th day of February, 1929, directing the payment
of Alimony, ~~pendente lite~~, by him to the plaintiff, Mae Townsend Matthews provided, a
copy of this Order be served on the said Ralph D. Matthews on or before the
20- day of June, 1929.

*The amount due to June 8th '29
was \$107.
Mae Townsend Matthews
Not paid through P.D.*

[Signature]
Judge.

True Copy: Test

Clerk.

MAY TOWNSEND MATTHEWS

IN THE CIRCUIT COURT NO. 2

VS.

OF

RALPH D. MATTHEWS

BALTIMORE CITY.

ORDERED BY THE CIRCUIT COURT NO. 2 OF BALTIMORE CITY, this 21st day of June, 1929, that the decree of divorce, granted the said MAY TOWNSEND MATTHEWS, on or about the 28th day of February, 1929, be modified to read as follows:

THAT THE SAID RALPH D. MATTHEWS, shall pay to the said MAY TOWNSEND MATTHEWS, the sum of Seven (\$7:00) Dollars, per week, in lieu of the Ten (\$10:00) Dollars, formerly mentioned in the decree, and that the said amount of Seven (\$7:00) Dollars, shall be paid each week by the said defendant, Ralph D. Matthews, for the support of their minor child, RALPH D. MATTHEWS, JR., and an additional amount of One (\$1:00) dollar on the arrearages now amounting to One Hundred (\$107:00) and seven dollars.

W. D. Matthews