

B 752
1926

IN THE
CIRCUIT COURT NO. 2
of
BALTIMORE CITY.

THEODORE BROOKINS

VS.

BESSIE BROOKINS

Carlston and
1224 ~~Carlston~~
and

Bill for Divorce

A. V. M.

Mr. Clerk;
Please file;

J. G. W. Hall
Solicitor for Plaintiff.

No 27684 B
1

By 29th September 1926

THEODORE BROOKINS

vs.

BESSIE BROOKINS

:
:
:
:
:
:
:

IN THE
CIRCUIT COURT NO. 2
OF
BALTIMORE CITY.

To the Honorable, the Judge of said Court:

Your Orator, complaining says:

-First-

That the parties hereto intermarried in Baltimore City, State of Maryland, on or about the 28th day of December, 1925, and lived together as man and wife till on or about the 10th day of March, 1926, when the defendant committed the crime of adultery with divers lewd men in the City of Baltimore, whose names will be disclosed at the hearing of this case.

-Second-

That he has not condoned the offense; neither has he lived nor cohabited with the said defendant, since the discovery of her said indiscreet conduct.

-Third-

That there are no children born as a result of said marriage.

-Fourth-

That both parties are residents of the City and State aforesaid, and have been for more than two years last past.

-Fifth-

That the conduct of your orator has been above reproach in all respects-Having been a true and devoted husband to the said defendant, his wife.

WHEREFORE, your orator prays a divorce a vinculo matrimonii from the defendant and such other and further relief as the case may require.

May it please your Honor to grant unto your orator, a writ of Subpoena, directed unto the said defendant, commanding her to be and appear in this Court on some certain day to be therein named and per

form such decree as may be passed in the premises.

And as in duty bound, etc.

Heardar Brackins
Plaintiff.

W. V. Hall
Solicitor for Plaintiff.

P396

Ct. Ct. No. 2

452
1926

B

Docket No. 351

Brookins

vs.

1224 Carlton St.

Brookins

Subpoena to Answer Bill of Complaint

Pw

No. 24684 B

Copy Copied

Filed 8 October, 1926

George W. Hall

Solicitor.

14

Summoned and a copy of the process left
with the defendant

John E. Bates
Sheriff

(no books)
10, 4/26

Fees \$0.80

EQUITY SUBPOENA

The State of Maryland

To

Bessie Brooks

1224 Careton St

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

Theodore Brooks

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 *14th* day of *September*, 192 *6*
Issued the *29th* day of *September*, in the year 192 *6*

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.)

IN THE CIRCUIT COURT NO. 2

OF

13752

BALTIMORE CITY *1916*

THEODORE BROOKINS

VS.

BESSIE BROOKINS

RESPONDENT'S ANSWER

No 27684 18

Mr. Clerk:

Please file.

Davis & Evans

ATTORNEYS FOR RESPONDENT

*Lincoln Bays Bond, attorney
for respondent - ors.*

DAVIS & EVANS

ATTORNEYS AT LAW

Filed 16th October 1916

THEODORE BROOKINS : IN THE CIRCUIT COURT NO. 2
Vs. : OF
BESSIE BROOKINS : BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of your respondent to the bill of complaint in the above entitled case, respectfully says:

1. That she admits the allegations contained in the first paragraph of the bill of complaint, in so far as the time of marriage is concerned and denies with great emphasis all the rest of the allegations therein contained.
2. That she neither admits nor denies the allegations contained in the second paragraph of the bill of complaint.
3. Your respondent denies with great emphasis the allegations contained in the third paragraph and further says that in answer thereto, that there is a child, Ethel Brookins, age two months, born as result of said marriage.
4. That she admits the allegations contained in the fourth paragraph of the bill of complaint.
5. That she denies the fifth paragraph of the bill of complaint, and further answering said paragraph, says that the plaintiff deserted and abandoned her and her infant child without cause.

Your respondent is destitute and without funds for the support of herself and child and is advised by counsel that she may petition this Honorable Court that she may be allowed a reasonable amount of money for the support of herself and minor child and that she be granted a reasonable amount as counsel fee to compensate her solicitor. The defendant is

employed and earns about thirty-five dollars per week.

WHEREFORE YOUR RESPONDENT PRAYS;

- (a) That the bill be dismissed with costs to the plaintiff.
- (b) Alimony and child support.
- (c) Counsel fee.
- (d) Custody of the minor child, Ethel.
- (e) Such other and further relief as the case may require.

AND as in duty bound, etc.

Quinn & Co.

ATTORNEYS FOR RESPONDENT.

Serve on
Nesdore Brooks

452
1926 B Docket 35

CIRCUIT COURT No. 2

Brooks
vs.
Brooks

Order Counsel Fee and Alimony
Pendente Lite
Husband Plaintiff

ORDER

No. 27684 B B.
(4)

Copy Copied

Filed 18 October 1926

George W. Hall
15/19/26
14 1/2 Pleasant St

Copy of the within Order of Court served on George W. Hall
Solicitor for the defendant on the 19th day
October 1926 in presence of Adam L. Quinn

John C. Potter
Sherrill

Fee \$10.50

Theodore Brooks

IN THE

CIRCUIT COURT No. 2

vs.
Bessie Brooks

OF

BALTIMORE CITY

September, TERM, 1926

ORDERED BY THE COURT, this 18 day of October 1926

that the Plaintiff Theodore Brooks

pay to the Defendant Bessie Brooks

the sum of twenty - five Dollars as Counsel Fee for the

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

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

Bessie Brooks

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 3rd

day of November 1926, provided a copy of this Order be served on the said Plaintiff

Theodore Brooks or his solicitor on or before the 23rd

day of October 1926

Charles F. Atter

TRUE COPY—TEST:

[Handwritten signature]

Clerk.

In the ^{13752/1916}
Ch Ch No 2 of
Baltimore City

Theodorz Brookins

vs

Bessie Brookins

Answer to Bisi
Order

Mr Clerk:
Please file etc

George W. Hall
Self for Respondent

No 27654 B.

Id 3rd March 1896

Theodore Brookins

Vs.

Bessie Brookins

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IN THE
CIRCUIT COURT No. 2. of,
BALTIMORE CITY

To the Honorable, the Judge of the aforesaid Court:

The answer of the defendant in the above entotled cause
respectively, represents unto this Honorable Court;

I.

We admit the marriage as aledged in the plaintiff's
Bill of complaint.

2.

We reaffirm our allegations of the bill of complaint,
in the second paragraph.

3.

We reaffirm our allegations in the bill of complaint,
in the third paragraph.

4.

We reaffirm our allegations in the bill of complaint,
in the fourth paragraph.

5.

we deny the allegations of the fifth paragraph in so
far as it allegations to our earning thirty five dollars per. week,
and put her to her strick proof of our being the father of her child.

Having answered all the allegations of the plaintiff's
Bill in due time we pray that her bill be dismissed.

And such other and further relief as in equity the case
may require.

And as in duty bound and so forth.

Geo. M. Hall
Solicitor for the Defendant.

State of Maryland, Baltimore City, To wit:

This is to certify that personally appeared before me the subscriber, a Notary Public, of the State of Maryland, in and for Baltimore City, George W. Hall, this 3rd., day of November, 1926, and did on behalf of the defendant herein named made oath in due form of law that the matters and facts stated are true to the best of his knowlege and belief.

U. Grant Taylor
Notary Public



George W. Hall

51/

✓ 18
Cir. Ct. No. 2

1926

Docket No. 35B.752

Theodor Brooks

vs.

Bessie Brooks

MOTION FOR HEARING

No. 2768 H. B.

6

27684

Filed, 25th January 1926

Davis & Evans

Theodor Brookins

Bessie Brookins

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

The Defendant

by Davis + Evans

Solicitor Supplies to have the above entitled cause placed in the
Trial Calender for hearing on *among pendente lite*

In conformity with the First Equity Rule.

Davis + Evans

Solicitor for *defendant*

Serve on

George W. House
Solicitor

W. W. Hall

Nov 23-26

40 51

Cir. Ct. No. 2

152
1926

B

Docket No. 35

Brookins

vs.

Brookins

NOTICE AS TO HEARING

No.

27684 B

7

Copy enclosed

Filed

25th November, 1926

H

Copy of the within Notice served on George W. Hall,
Solicitor on the 23rd day of November, 1926, in
the presence of Louis Heald.

John E. Potee
Scriber

Fees \$0.50

148

Present

RECEIVED

Handwritten notes and stamps at the bottom right of the page.

Frederick Brooks
vs.
Bessie Brooks

IN THE
CIRCUIT COURT, No. 2
OF
BALTIMORE CITY.

Upon application made by the Solicitor for the *Defendant*

the above entitled cause has been placed upon the Trial Calendar in accordance with the provisions of the First Equity Rule, and the same will stand for hearing on *Monday*

predecessors etc

when reached in due course on the said calendar.

JOHN PLEASANTS,

Clerk Circuit Court No. 2.

Ct. Ct. No. 2 35 B. ⁷⁵²
192 6

Theodor Brookins

vs.

Bessie Brookins

Final Order, Counsel Fee and Alimony
Pendente Lite,

No. 27684 B.
8

Filed

3rd December

192 6

Theodore Brookins

IN THE

CIRCUIT COURT No. 2

vs.

Bessie Brookins

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 *Third* day

of *Dec.* 1926, that the *Plaintiff, Theodore Brookins,*

pay to the *Defendant, Bessie Brookins,*

the sum of *Twenty* Dollars, as Counsel Fee

for the Solicitor of the *Defendant* and that he

further pay the sum of *Five* Dollars per week,

during the continuance of this suit, to the said *Bessie Brookins*

as Alimony pendente lite accounting from the *third* day of *Dec* 1926

*Payable through the prisoners aid association
at home 7000*