

B 362/1923

In the Circuit Court,  
No. 2,  
Baltimore City.

JOHN E. DESKINS

VS.

HETTIE DESKINS.

# 1319 Upton St -

Bill for divorce,  
A VINCULO MATRIMONII.

No 23058 B

Mr. Clerk:--

Please file &c.,

*Roy S. Bond*  
Sol. for Plaintiff.

ROY S. BOND  
ATTORNEY AT LAW  
215 ST. PAUL PLACE  
BALTIMORE, MD.

FILED  
31 July 1923

3/19/118

JOHN E. DESKINS

VS.

HETTIE DESKINS

In the Circuit Court

No. 2,

Baltimore City.

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator, John E. Deskins complaining, respectfully says:

(1) That he was married to his wife, Hettie Deskins, in Baltimore City, State of Maryland, on or about the 14th day of November, 1907, with whom he resided until on or about the 25th day of November, 1909.

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

(3) That though the conduct of your orator, John E. Deskins, towards his said wife, has been kind, affectionate and above reproach, she without any just cause or reason, abandoned and deserted him and has declared her intentions to live with him no more; that such abandonment has continued uninterruptedly for more than three years, is deliberate and final, and the separation of the parties is beyond any reasonable hope or expectation of a reconciliation.

(4) That the defendant since the said marriage, has committed the crime of adultery with divers lewd men, whose names will be disclosed on the day of trial, and that the said acts were committed without his procurement, connivance or consent, and that he has not lived nor cohabited with the said defendant, since he discovered the same.

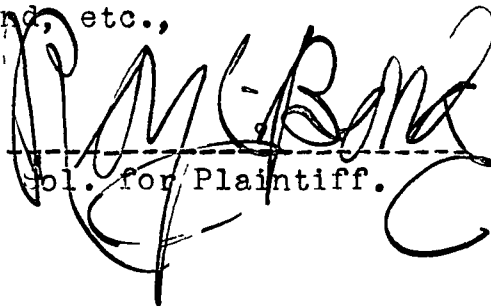
(5) That there are two children as issue of said marriage, Edgar aged fifteen (15) years and Hurie aged thirteen (13) years.

WHEREFORE YOUR ORATOR PRAYS:

- a- A divorce, A Vinculo Matrimonii,  
from the defendant, Hettie Deskins,
- b- The care and custody of the minor  
children,
- c- Such other and further relief as the  
case may require.

May it please your Honor, to grant unto  
your orator, John E. Deskins, the writ of subpoena,  
directed unto the said defendant, Hettie Deskins, re-  
siding 1319 Upton Street, commanding her to be and ap-  
pear in this court, in person or by solicitor, on some  
day certain to be therein named, and perform such decree  
as may be passed in the premises.

As in duty bound, etc.,

  
Solicitor for Plaintiff.

67

Ct. Ct. No. 2

362  
1923

B Docket No. 32

Leskens

vs.

1319 Upton  
Leskens

Subpoena to Answer Bill of Complaint

Pro

No. 23058.B

Copy Corred

Filed 13 August, 1923

Roy S. Bond

Solicitor.

10

Summond and a copy of the Procea by with  
the dependants, Thomas G. McWaltz  
(Kelly) 8/8/23  
L. S. 20.80  
A. H. H. P.

EQUITY SUBPOENA  
The State of Maryland

To

*Hettie Deskins*

*1319 Upton 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 *August*, next, cause an appearance to be entered for you, and your Answer to be filed to the Complaint of

*John E Deskins*

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 *3*

Issued the *31* day of *July*, in the year 192 *3*

*John Peasants*  
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.)

on The Annual Report #2  
of 19362/1923  
Baltimore City

John E. Deskins  
1111 Russell St  
W

Nettie Deskins  
~~1111 Russell St~~

Aunt to Belle  
J. W. W. W.

Mr Clerk please file  
P. H. Jones  
W  
No 23058 B  
3

DAVIS & BISHOP  
ATTORNEYS AT LAW  
BANNEKER BUILDING  
14 E. PLEASANT STREET  
BALTIMORE, MD.

1  
Aug 21 August 1923

John E. Deskins

IN THE CIRCUIT COURT NO. 2

Vs.

OF

Hettie Deskins

BALTIMORE CITY.


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The answer of your respondent to the bill of complaint is as follows:-

- 1- Your respondent admits the first paragraph of the complainant's bill of complaint.
- 2- Your respondent admits 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 of the bill of complaint.
- 4- Your respondent denies with great emphasis the allegations contained in the fourth paragraph of the bill of complaint.
- 5- Your respondent admits the fifth paragraph of the bill of complaint.
- 6- Your respondent is destitute and without the means of supporting properly the children born of her marriage to the complainant and also is without the means necessary for the proper defense of this suit. The complainant is conducting a transfer business according to the one information available to the respondent, and realizes a profit approximately amounting to Fifty Dollars (\$50.00) per week. Your respondent is advised by counsel that she is entitled to petition this Honorable Court to pass an order requiring the complainant to pay your respondent a sum certain as alimony pendente lite and an additional sum to pay her solicitor.

Wherefor your respondent prays,

- (a) That the bill be dismissed with cost to the complainant.
- (b) That the care and custody of the minor children remain in your respondent.
- (c) Alimony pendente lite.
- (d) Counsel fee.
- (e) Permanent alimony.

  
 \_\_\_\_\_  
 Attorney For Respondent.

Same as.  
John E. Deskins  
1111 Purcell St

32B Docket 362

CIRCUIT COURT No. 2

John F. Deskins  
vs.  
Hattie Deskins

Order Counsel Fee and Alimony  
Pendente Lite  
Husband Plaintiff

ORDER

No. 23058 B.

(4) (7)

Copy - copied  
copy or - copied

Filed 21 August 1923  
" 24 January 1924

Now Es  
(Farley)

Thomas J. McHully  
Shriff

Copy of the within Order of Court,  
served on John E. Deskins, on the  
26th day of January, 1924, in  
presence of John F. Joyce,

John E. Potee,  
Shriff.

Fees - \$0.50



John E. Deskins

IN THE

CIRCUIT COURT No. 2

vs.

OF

Helene Deskins

BALTIMORE CITY

July, TERM, 1923

ORDERED BY THE COURT, this 21 day of August 1923

that the Plaintiff

John E. Deskins

pay to the Defendant

Helene Deskins

the sum of

fifty

Dollars as Counsel Fee for the

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

seventeen

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

Heene Deskins

as Alimony, pendente lite, unless cause to the contrary be shown on or before the 6

day of September 1923, provided a copy of this Order be served on the said Plaintiff

John E. Deskins

on or before the 27

day of August 1923

D. W. Bond

TRUE COPY—TEST:

H. S. ...

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court No. 2 of Baltimore City, this 24

day of January 1924, that the time for showing cause under said Order be extended to the 8 day of February 1924, and the time for service of a

copy of the same be extended to the 29 day of January 1924.

Walter S. Deskins

Served on  
J. Steward Davis  
Solicitor

94

32

**CIRCUIT COURT**

362  
1923

#2,

Docket No. 32 B

JOHN E. DESKINS

VS.

HETTIE DESKINS.

**PETITION AND ORDER TO  
TAKE TESTIMONY UN-  
DER 30th RULE**

No. 23058 B  
5

Copied = copied

Filed 10 November 1923

Copy of the within Petition and Order of Court  
served on J. Steward Davis, Solicitor on the  
14th day of November 1923 in presence of Margaretinkelstein

Thomas F. M. Gully  
Sheriff

Fees \$ 0.50

JOHN E. DESKINS

IN THE

Circuit Court

- #2 -  
OF

BALTIMORE CITY

VS.

HETTIE DESKINS.

To the Honorable the Judge of the  
Circuit Court 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 therefor prays your Honor to pass an order, according to the Statutes for such case made and provided.

And as in duty bound will ever pray.

*[Handwritten Signature]*  
Solicitor for Plaintiff.

Upon the foregoing Petition and Application it is this 10<sup>th</sup> day of November  
A. D., 19 23, 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 17<sup>th</sup> day of November 19 23

*[Handwritten Signature]*  
Dillon Bond

Circuit Court No. 2

362

1923.

Docket 32B.

JOHN E. DESKINS

vs.

HETTIE DESKINS.

*Japp*

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

No.

*23058 B*  
*6*

Filed

*26 November*

, 1923

JOHN E. DESKINS

vs.

HETTIE DESKINS.

IN THE

Circuit Court No. 2,

OF

BAETIMORE CITY.

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

THE PETITION OF John E. Deskins, 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.

*[Signature]*  
Solicitor for Plaintiff.

I consent to the passage of the foregoing order.

*[Signature]*  
Solicitor for Defendant.

ORDERED, this 26 day of November 1923, 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.

*[Signature]*

32 B 362  
1924  
In the Circuit Court,  
No. 2,  
Baltimore City.

JOHN E. DESKINS

VS.

HETTIE DESKINS.

---

Order to Strike Out  
Appearance.

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No 230518 B

Feb 4 February 1924

JOHN E. DESKINS

VS.

HETTIE DESKINS

IN THE  
CIRCUIT COURT, NO. 2,  
BALTIMORE CITY.

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Mr. Clerk:--

Please strike out my appearance  
as Counsel for plaintiff, in the above entitled  
casue.

  
~~Sol. for Plaintiff.~~

B362/1923  
IN THE CIRCUIT COURT #2 OF  
BALTIMORE CITY.

JOHN E. DESKINS,

VS

HETTIE DESKINS.

ANSWER TO PETITION &  
ORDER OF COURT.

Mr. Clerk:

Please file.

*Richard H. Stevenson*  
Solicitor for plaintiff.

*No 23058 B*  
*9*

RICHARD H. STEVENSON  
ATTORNEY AT LAW  
110 E. LEXINGTON ST.  
BALTIMORE, MD.

*Feb 6 February 1924*



JOHN E. DESKINS,

vs

HETTIE DESKINS.

\*

\* IN THE CIRCUIT COURT #2 OF

\*

BALTIMORE CITY.

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TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of John E. Deskins, to the petition and Order of Court heretofore filed against him respectfully represents.

This respondent denies each and every of the allegations therein contained.

Having answered said petition this respondent prays to be dismissed with his reasonable costs.

*John Deskins*

Complainant.

*Richard H. Stevenson*  
Solicitor for plaintiff.

STATE OF MARYLAND,

CITY OF BALTIMORE, TO WIT:

I HEREBY CERTIFY, That on this *24* day of February, 1924, before me the subscriber a Notary Public in and for the City and State aforesaid personally appeared John E. Deskins, and made oath in due form of law that the matters and facts above set forth are true to the best of his knowledge and belief.

As witness my hand and Notarial Seal.

*Samuel J. Meyler*  
Notary Public.