

IN THE CIRCUIT COURT OF

BALTIMORE CITY.

*B 617
1927*

MATTIE FOWLKES

VS.

THOMAS FOWLKES.

1610 St Joseph St

BILL FOR DIVORCE.

B 32533

Mr. Clerk:

(1)
Please file.

George W. Evans
ATTORNEY FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

7d 6 Dec 1927

MATTIE FOWLKES

:

IN THE CIRCUIT COURT

VS.

:

OF

THOMAS FOWLKES

:

BALTIMORE CITY

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Oratrix complaining respectfully represents:

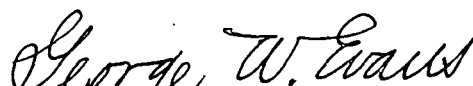
- (1) That she was married to her husband, Thomas Fowlkes, on or about the 12th day of May, 1920 and with whom she resided until the 30th day of July, 1920 when the defendant deserted the plaintiff.
- (2) That though the conduct of your Oratrix toward the said defendant has always been kind, affectionate and above reproach, he has, without any just cause or reason, deserted and abandoned her and has declared his intentions to live with her no longer and such abandonment has continued uninterruptedly for more than three years and is deliberate and final and the separation of the parties is beyond any reasonable hope of reconciliation.
- (3) That your Oratrix has not lived or co-habited with the said defendant since said desertion.
- (4) That there are no children born as result of said marriage.
- (5) That both your Oratrix and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this Bill of Complaint.

TO THE END, THEREFORE, YOUR ORATRIX PRAYS:

- (a) That she may be divorced A Vinculo Matrimonii from the said John Fowlkes.
- (b) That she 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 against the said Thomas Fowlkes, commanding and requiring him to be and appear in this Court on some day certain to be named therein to answer the premises and abide by and perform such decree or order as may be passed therein.

AND as in duty bound, etc.



ATTORNEY FOR PLAINTIFF

P 495 Ct. Ct.

B-617
192 7 Docket No.

Mattie Fowlkes
vs.
Thomas Fowlkes

12/17/27
Vacated premises

1610 St. Joseph's St.
SUBPOENA TO ANSWER BILL OF COMPLAINT

No. B-32533
(2)

Filed 12 Dec 1927
" 9 Jan 1928
George W. Evans SOLICITOR
215 St. Paul place
4

Non Est.
(Moylan)
John R. Pata Sheriff

Dec 12 7
REISSUED TO January Return Day, 1928.
Chas R Whitford Clerk
John E. Poles
John P. Henrich

Am Est
Moylan

RECEIVED AT
THE SHERIFFS OFFICE ON

DEC 6 1927 3 11 PM

RECEIVED AT THE SHERIFFS OFFICE ON

RECEIVED AT THE SHERIFFS OFFICE ON

EQUITY SUBPOENA

The State of Maryland

To Thomas Fowlkes,
1610 St. Joseph Street

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

Mattie Fowlkes

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 JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the 14th day of November 1927
Issued the 6th day of December, in the year 1927.

Chas. 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.

Ct. Ct.

192

Docket No.

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

Filed....., 192....

SOLICITOR

EQUITY SUBPOENA

The State of Maryland

To Thomas Fowlkes,
1610 St. Joseph Street

(Copy)

REISSUED TO January Return Day, 1928
Chas R Whiteford Clerk,
Dec 12 1927.

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Mattie Fowlkes

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WITNESS, the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the **14th** day of **November** 192**7**
Issued the **6th** day of **December**, in the year 192**7**.

Chas. 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.

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

617
1927 *67B*

MATTIE FOWLKES

VS.

THOMAS FOWLKES

B 32533

(4)
ORDER OF PUBLICATION.

Mr. Clerk:

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF.

DAVIS & EVANS
ATTORNEYS AT LAW

Filed April 1928.

3/13/3/64

PO

DAVIS & EVANS, SOLICITORS,
215 St. Paul Place,
IN THE CIRCUIT COURT OF BALTIMORE CITY.
MATTIE FOWLKES VS. THOMAS FOWLKES
ORDER OF PUBLICATION.

The object of this bill is to procure a divorce a vinculo matrimonii by the plaintiff, Mattie Fowlkes from the defendant, Thomas Fowlkes.

The bill recites that the parties were married May 12, 1920 and lived together until July 30, 1920. That both parties are residents of Baltimore City but that two summons sent to the defendant's last known address were returned non est by the Sheriff of Baltimore City. That your Oratrix has behaved herself as a faithful, chaste and affectionate wife but that the defendant deserted her without any just cause and that the separation of the parties is beyond any hope of reconciliation and that your Oratrix has not lived or co-habited with the said defendant since said desertion. That there are no children.

It is thereupon ordered by the Circuit Court of Baltimore City this 7th day of April, 1928 that the plaintiff, by causing a copy of this order to be inserted in some daily newspaper published in Baltimore City, once a week for four successive weeks before the 10 day of May 1928, given notice to the absent defendant of the object and substance of this bill, warning him to be and appear in this Court in person or by Solicitor on or before the 26 day of May 1928, to show cause, if any he may have, why a decree should not be passed as prayed.

Thomas Fowlkes
Charles T. Steen