

IN THE CIRCUIT COURT OF
BALTIMORE CITY.

B 903
1924
GEORGIA GASKINS

VS.

ANDREW GASKINS

1546 N. Carey St

BILL FOR DIVORCE.

Mr. Clerk:-

Please file.

Davis & Evans
ATTORNEYS FOR PLAINTIFF.

B 28109
11

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE
BALTIMORE, MD.

Ad 17 December 1924

GEORGIA GASKINS

:

IN THE CIRCUIT COURT

VS.

:

OF

ANDREW GASKINS

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT

Your Oratrix complaining respectfully represents:

1. That she was married to her husband, Andrew Gaskins June 3, 1916 and with whom she resided until about the 12th day of *January*, 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, abandoned and deserted her and has declared his intentions to live with her no longer, and that 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 expectation of reconciliation.
3. That your Oratrix has not lived or co-habited with said defendant since said desertion.
4. That there are no children as issue of said marriage.
5. That your Oratrix further states that she is destitute and without funds to defray the expenses of this litigation; further that she is without the means of support for herself. That she is advised by Counsel that she is permitted to petition this Honorable Court that the defendant shall be compelled to contribute a reasonable amount as alimony pendente lite toward the support of your Oratrix and that she will be awarded an amount in order to compensate her solicitors.

6. Your defendant is employed and earns an average of thirty dollars per week.

7. 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.

TO THE END, THEREFORE,

(a) That your Oratrix may be divorced A Vinculo Matrimonii from the said Andrew Gaskins.

(b) That she may be declared to be entitled to receive a reasonable sum as alimony pendente lite and an additional sum as counsel fee.

(c) That she may resume her maiden name "GRIFFIN".

(d) 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 Andrew Gaskins, 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.

Davis T. Evans
ATTORNEYS FOR PLAINTIFF.

P498

902
1924

B Docket No. 64

Ct. Ct.

Gaskins

- vs. -

Gaskins
1546 N. Carey St

SUBPOENA TO ANSWER BILL OF COMPLAINT

No.

^{pro}
B-28109

Filed

(2)
30 Dec

1924

J. S. Davis SOLICITOR

14

Summoned and a copy of the process left with
the defendants John C. Patee Sheriff

12/23/24
(K. G. Looney)

Fee \$0.80

EQUITY SUBPOENA

The State of Maryland

To

Andrew Gastkins

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

Georgia Gastkins

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 *8th* day of *Dec* 192*4*

Issued the *17th* day of *Dec*, in the year 192*4*

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.

(General Equity Rules 11)

64 B Docket 902

CIRCUIT COURT.

Gaskins
498 vs.
Gaskins

Order for Alimony

Pendente Lite

ORDER

B No. 28109
(3)

Fd:

19 Dec 1924
14

copy of the within Order of Court served
on Andrew Gaskins on the 23rd day
of December 1924 in presence of
Joseph St. George
John C. Patee
Sheriff

Recd \$0.50

9 on

Georgia Gaskins

vs.

Andrew Gaskins

IN THE
CIRCUIT COURT

OF

BALTIMORE CITY

1924 TERM, 1924

ORDERED BY THE COURT this 19 day of Dec 1924

that the defendant

Andrew Gaskins

pay to the plaintiff

Georgia Gaskins

the sum of

200.00

Dollars per week, during the continuance of this suit, accounting from the

day of Dec 1924 to the said plaintiff

Georgia Gaskins 31

as alimony, *pendente lite* unless cause to the contrary be shown on or before the

day of Dec 1924, provided a copy of this Order be served on the said defendant

Andrew Gaskins on or before the

24

day of Dec 1924

Charles F. Brown

TRUE COPY—TEST:

CLERK

\$30 a week

no childre

IN THE
CIRCUIT COURT OF BALTIMORE

649
CITY *902*

1924
Georgia Gaskins

VS.

Andrew Gaskins

Petition for Answer

Mr. Clerk;

Please file, &c.

B 28109

157
Peter L. Woolley

Solicitor for the Defendant.

118 E. Lexington St. -

FILED

23 Dec 1924

GEORGIA GASKINS : IN THE CIRCUIT COURT
VS. : OF
ANDREW GASKINS : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Defendant answering the bill of complaint in the above cause, respectfully says:

1. That he admits the first paragraph of the complainant's bill.
2. That he denies the second paragraph of the complainant's bill.
3. That he neither admits nor denies the third paragraph of the complainant's bill.
4. That he admits the fourth paragraph of the complainant's bill.
5. That he denies the fifth paragraph of the complainant's bill.
6. The defendant admits that he is employed, but says that he does not earn over twenty dollars per week.
7. That he *admits* the seventh paragraph of the complainant's bill.

TO THE END, THEREFORE:

- (a) That the bill be dismissed with cost to the complainant.
- (b) That the amount allowed as alimony pendente lite be determined in accordance with the amount of his earnings.

AND as in duty bound, etc.

Peter L. Woodbury - 118-E Lexington St.
ATTORNEY FOR DEFENDANT

Sapp

Circuit Court

902
1924

Docket *B64*

Georgia Gaskins
vs.

Andrew Gaskins

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

B 28109
No.

Sapp (6)

Filed *26 Dec* 1924

Georgia Gaskins

vs.

Andrew Gaskins

IN THE

Circuit Court

OF

BALTIMORE CITY

**To the Honorable the Judge of the
Circuit Court of Baltimore City:**

THE PETITION OF *Georgia Gaskins*

in this case, respectfully shows that *she* desires to take testimony in this case, and respectfully prays that leave be granted to do so before one of the Standing Examiners of this Court.

Davis Evans
Solicitor for *plaintiff*

ORDERED, this *26th* day of *December* 192*4*, 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.

Charles F. R...

Circuit Court

962
1924

Docket *BBP*

Georgia Gaskins

vs.

Andrew Gaskins

SUBMISSION FOR DECREE.

Mr. Clerk,
Please file,

Davis Evans
Solicitor S for Plaintiff.

B 28109
No. _____

Filed *P Jan* 19*24*

Georgia Gaskins

vs.
Andrew Gaskins

*In the Circuit Court
of Baltimore City*

November TERM 1928

To the Honorable

Charles F. Stein
Judge of Said Court:

The above cause is respectfully submitted for
decree and the 43rd General Equity Rule is hereby waived.

Davis & Evans

Solicitor S. for Plaintiff,

Peter L. Woodbury

Solicitor for Defendant.

Circuit Court

902
1924

Docket No. B 64

Georgia Gaskins

vs.

Andrew Gaskins

Order of Reference
and Report

P 28109

No.

Case 9

Order Filed

day of

Jan 1925

Report Filed

day of

192,

Georgia Gaskins

vs.

Andrew Gaskins

IN THE
Circuit Court

OF
BALTIMORE CITY

November

Term, 1924

This case being submitted, without argument, it is ordered by the Court, this 8th day of January 1925, 1925, that the same be and it is hereby referred to Ward B. Cole Love, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Charles F. Love

Report of Auditor and Master

Bill for divorce a vinculo matrimonii and for the resumption of her maiden name filed by the wife against her husband on the ground of abandonment. Code Art. 16 secs. 36-41.

Defendant summoned and answers by solicitor.

Plaintiff's residence in Baltimore City for more than two years proven.

The marriage proven.

The abandonment for three years, its finality and the irreconcilability of the parties proven.

More than thirty days have elapsed since the filing of the bill.

Case submitted and ready for decree.

Ward B. Love

Auditor and Master.

January 17th, 1925.

CIRCUIT COURT

B 902
1924

No. 64 Docket

GEORGIA GASKINS

VS.

ANDREW GASKINS
Recorded

Folio 12 1925

Decree of Divorce

B No. 28109

(10)

Ed. 19th January 1925,

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

Maud B. Cox
Auditor and Master.

Circuit Court

OF

BALTIMORE CITY

GEORGIA GASKINS

VS.

ANDREW GASKINS

----- Term, 192-----

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

✓ It is thereupon, this 19th day of January, A. D. 1925

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said

----- Georgia Gaskins -----

the above named Complainant be and She is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, the said Andrew Gaskins.

AND IT IS FURTHER ORDERED that said complainant be and she is hereby authorized to resume her maiden name, --Georgia Griffin.

And it is further Ordered, That the said ----- defendant -----
pay the cost of this proceeding.

Georgie A. Solter

Doc. 9 902
1924

3/13/2/4

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Georgia Gaskins

vs.

Andrew Gaskins

No. 28109B

PLAINTIFF'S COSTS

Examiners.....\$.....
Copies.....
Sheriff.....
Stenographer.....
\$ _____

DEFENDANT'S COSTS

Examiners.....\$.....
Copies.....
Sheriff.....
Stenographer.....

fd 9 Jan 1925 \$ _____

Georgia Gaskins

vs.

Andrew Gaskins

In the Circuit Court

OF BALTIMORE CITY.

The above 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, A. de RUSSY SAPPINGTON, 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

Twenty-sixth day of *December* 19*24*; met on

the *Twenty-sixth* day of *December* in the year nineteen hundred and *twenty-four* at my office, in the City of Baltimore, in the State

of Maryland, and assigned the *twenty-sixth* day of *December* in the same year at *one* o'clock in the *after-*noon and the

office of *Messrs Davis & Evans* 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:—

Georgia Gaskins.

State of Maryland, for at least two years prior to the filing of this suit?

A. Yes.

6 Q. Are there any children as the result of this marriage?

A. No.

7 Q. What was your conduct towards your husband while living together; how did you treat him?

A. I treated him very nice.

8 Q. State whether or not you were always a kind, affectionate and faithful wife?

A. Yes.

9 Q. Are you and your husband living together now?

A. No sir.

10 Q. Which left the other; did you leave him or did he leave you?

A. He left me.

11 Q. When?

A. January 12th., 1920.

12 Q. What did he say and what did he do at that time?

A. He was going around with another girl, and he told me to get out if I did not like it, and I said that I was not going, and he said that he would get out himself.

Georgia Gaskins.

13 Q. You had a fuss about this girl, did you?

A. Yes.

14 Q. And he said that he was going to leave?

A. Yes.

15 Q. At the time that he left, did you try to reason with him and get him to stay and do as a husband should?

A. Yes, I certainly did.

16 Q. And notwithstanding that, you say that he left you?

A. Yes.

17 Q. Now, after that time did you go to him and try to get him to come back and live with you?

A. Yes; I have talked with him.

18 Q. Did he refuse or consent to come back?

A. He refused.

19 Q. Did you try to get him to come back more than one time?

A. Yes; I asked him several times.

20 Q. And each time you say that he refused?

A. Yes.

21 Q. Has his abandonment and desertion of you continued uninterruptedly since January 12th., 1920?

A. Yes.

Georgia Gaskins.

22 Q. State whether or not his abandonment and desertion of you was deliberate and final; did he deliberately and finally abandon and desert you?

A. Yes.

23 Q. State whether or not there is any reasonable expectation of a reconciliation; do you ever expect to make up and live together again?

A. No sir.

24 Q. How long have you resided in Baltimore, Maryland, last past?

A. I have been living here for about ten years.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of 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.

A.---

George Gastino

Abbie Griffin, a witness of lawful age, produced on behalf of the Plaintiff, having been first duly sworn, deposeseth and saithas follows, that is to say:

By the Examiner:

1 Q. State your name residence and occupation?

A. Abbie Griffin, 4648 Linmore Avenue; Philadelphia, Pennsylvania; waitress.

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

A. Yes.

By Mr. Davis:

1 Q. Are they related to you?

A. Sister.

2 Q. Are the parties to this suit husband and wife?

A. Yes.

3 Q. Did they live together as husband and wife and were they always known and recognized in the community in which they lived as husband and wife?

A. Yes.

4 Q. Has the Plaintiff been a resident of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit

A. Yes.

5 Q. Are there any children as the result of this marriage?

A. No childrrn at all.

Abbie Griffin.

6 Q. What was her conduct towards her husband while living together?

A. Very kind.

7 Q. State whether or not she was always a kind, affectionate and faithful wife?

A. Yes.

10 Q. Are the parties to this suit living together now?

A. No sir.

10 Q. Which left the other; did he leave her or did she leave him?

A. He left her.

12 Q. When?

A. He left her the 20th., January.

13 Q. What year?

A. 1920.

13 Q. She has testified that it was the 12th., January 1920; is that correct?

A. It was about that time.

16 Q. How do you know that he abandoned and deserted her at that time?

A. I lived right in the house with them.

16 Q. At the time of the abandonment?

A. Yes.

Abbie Griffin.

17 Q. State what he said and what he did at that time?

A. She asked him what he was going to do, and he said that if she did not like it that she would either have to leave or that he would leave, and he left the same day.

18 Q. They had a fuss about another woman?

A. Yes.

19 Q. And he said that he was going to leave her?

A. Yes.

20 Q. At that time did she reason with him and try to get him to stay and do as a husband should and live with her?

A. Yes; she did.

21 Q. And notwithstanding that you say that he left her?

A. Yes.

22 Q. After that time did she go to him or communicate with him and try to get him to come back to her?

A. Yes.

23 Q. Did he refuse or consent to do so?

A. He refused.

24 Q. Have you talked with him since the separation?

A. I have.

24 Q. What has he told you about living with her again?

Abbie Griffin.

A. He said that he did not intend to live with her any more, and that he really liked the other woman.

25 Q. Now, has his abandonment and desertion of his wife continued uninterruptedly since January 12th., 1920; that is, have they lived or cohabited together since that time?

A. No sir.

26 Q. State whether or not his abandonment and desertion of his wife was deliberate and final; did he deliberately and finally abandon and desert his wife?

A. Yes.

27 Q. State whether or not there is any reasonable expectation of a reconciliation; do you ever expect them to make up and live together again?

A. No sir.

GENERAL QUESTION

Do you know or can you state any other matter or thing that may be to the benefit or advantage of 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.

A.---

No.

Abbie Griffin

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.....*9th*..... day of *January*..... in the year of Our Lord nineteen hundred and *twenty-four*..... at the City of Baltimore, in the State of Maryland

A. de Russy Sappington (SEAL).
Examiner.

There are.....*no*..... Exhibits with these depositions, to wit:

Plaintiff's..... Exhibit.....*/*.....

Defendant's..... Exhibit.....*/*.....

A. de Russy Sappington
Examiner.

I, A. de RUSSY SAPPINGTON, 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.....

A. de Russy Sappington
Examiner.