

B 348/1919

3/17/33

IN THE CIRCUIT COURT #2 OF
BALTIMORE CITY.

ADA HAWKINS,

v.

FLOYD HAWKINS.

"Bill for Permanent
Alimony & Order Court"

Mr. Clerk:

Please file, etc.,

Harry B. Wolf
Solicitor for plaintiff.

No 18408 B
1

HARRY B. WOLF,
ATTORNEY AT LAW,
110-112 E. LEXINGTON ST.,
BALTIMORE, MD.

Ed. 10th September 1919

ADA HAWKINS,

*

v.

*

IN THE CIRCUIT COURT #2 OF

*

BALTIMORE CITY.

*

FLOYD HAWKINS.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

YOUR ORATRIX COMPLAINING SAYS:

(1)

That on the 5th. day of November, 1910, she was married to her husband, Floyd Hawkins, with whom she resided until the 25th. day of August, 1919.

(2)

That your oratrix has been a resident of the City of Baltimore, State of Maryland, for more than two years preceding the filing of this, her bill of complaint.

(3)

That there are no children as issue of said marriage.

(4)

That your oratrix has always behaved herself as a kind, chaste and affectionate wife.

(5)

That, though the conduct of your oratrix towards her husband, the said Floyd Hawkins, has always been kind, chaste and above reproach, he, the said Floyd Hawkins, has, without any just cause or reason, abandoned and deserted her and has been guilty of the crime of adultery with divers lewd and abandoned women whose names are to your oratrix unknown.

(6)

That your oratrix has not lived nor cohabited with her husband, the said Floyd Hawkins, since she discovered his said adulteries.

(7)

That her husband, the said Floyd Hawkins, is employed and earns about \$40. per week, while 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:

(a) That your oratrix may be declared to be entitled to receive by way of permanent alimony such an allowance of her husband's estate as may be proportionate to his earnings and station in life.

(b) That in the meantime the said Floyd Hawkins, her husband, may be required to pay to your oratrix a reasonable sum for her support and maintenance during the pendency of this suit, and any sums of money as may enable your oratrix to employ counsel to prosecute this suit and to defray the necessary costs and expenses thereof.

(c) 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 Floyd Hawkins, defendant, who is a resident of the City of Baltimore, commanding him to be and appear in this Court in person or by solicitor on some certain day to be named therein to show cause, if any he may have, why a decree ought not be passed as prayed.

And as in duty, etc.,

Harry Bluff
Solicitor for plaintiff.


Ada Hawkins

STATE OF MARYLAND,

CITY OF BALTIMORE, To wit:

I HEREBY CERTIFY, That on this 9th day of September, 1919, before me, the subscriber, a Notary Public in and for the State and City aforesaid personally appeared Ada Hawkins, and made oath in due form of law that the matters and facts above set forth are true to the best of her knowledge and belief.

As witness my hand and Notarial Seal.


Frank Schmidt
Notary Public.

284

Ct. Ct. No. 2

348
1919

B

Docket No. 28

Hawkins

vs.

Hawkins

Subpoena to Answer Bill of Complaint

1324 McCulloch St
Paw

No. 18408 B
2

Copy = Copies

Filed

26th September, 1919

Harry B Wolf

Solicitor.

10

Summoned and a copy of the process left with

the defendant

(Dally)

Thomas F. McNulty
Sheriff

Five \$10.50

EQUITY SUBPOENA
The State of Maryland

To

Floyd Hawkins

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, That all excuses set aside, you be in your person before the Circuit Court No. 2 of Baltimore City, at the Court House in said city, on the second Monday of *October*, 191*9*, to answer the complaint of

Ada Hawkins

against you in said Court exhibited.

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

WITNESS, the Honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *8th* day of *September*, 191*9*

Issued the *10th* day of *September*, in the year 191*9*

John Pleasant

Clerk.

NOTICE TO THE PERSON SUMMONED:

"Personal attendance in Court on the day named in the above Writ is not required; but unless within such number of days thereafter as the law limits, legal defense is made to the above mentioned suit a judgment by default may be entered against you."

SERVE ON

Floyd Hawkins

B Docket

Circuit Court No. 2

Hawkins

vs.

9/25/19

Hawkins

Order Counsel Fee and Alimony.

Pendente Lite

ORDER

10th September 1919

" 23rd September 1919

No. *18408* B.

513
(3) (X)

Copy = Copied
Copy order = Copied

Filed *10th September 1919*
" 23rd September 1919
Kary B May Solicitor

Now Ex Thomas J. McMully Sheriff
(Kelly)

2nd Return

copy of the within Order of Court served on Floyd Hawkins on the 25th day of September 1919 in the presence of John B Kelly

Thomas J. McMully Sheriff

Fees \$0.50

IN THE
CIRCUIT COURT No. 2

OF

BALTIMORE CITY

Alda Hawkins

vs.

Floyd Hawkins

September TERM, 191 *9*

ORDERED BY THE COURT this *10th* day of *September* 191 *9*

that the defendant *Floyd Hawkins*

pay to the plaintiff *Alda Hawkins*

the sum of *two*

Dollars per week, during the continuance of this suit as Alimony, **pendente lite** unless cause to the contrary be shown on or before the *26th*

day of *September*, 191 *9*, *[redacted]* provided a copy of this Order *[redacted]* defendant

Floyd Hawkins on or before the *16th*

day of *September*, 191 *9*, the question of Counsel fee being reserved for the further determination of this Court.

John D. Dover

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 *23rd* day of *September* 191 *9*, that the time for showing cause under said Order be extended to the *9th* day of *October* 191 *9*, and the time for service of a copy of the same be extended to the *29th* day of *September* 191 *9*.

John D. Dover

B 3/8/1919

In The Circuit Court
No - 2

of Baltimore City

Oda (Hawkins)

vs

Floyd Hawkins

Answer to Bill

Mr Clerk please file

J. Steward Davis

No 18408 B

J. STEWARD DAVIS

ATTORNEY AT LAW

118 E. LEXINGTON STREET

BALTIMORE, MD.

Ad. giv. v. cl. h. 1919

Ada Hawkins

In the Circuit Court No. 2 of

Vs.

Floyd Hawkins

Baltimore City.

To The Honorable, The Judge of Said Court:

The answer of your respondent to the bill of complaint filed, and the petition for alimony pendente lite and permanent alimony and the order of this Honorable Court thereon, respectfully says:-

First, Your respondent remits the marriage as said forth in paragraph one of the plaintiff's bill.

Second, That your respondent admits that both parties hereto, are residents of Baltimore City, State of Maryland, and have been for more than two years prior hereto.

Third, Your respondent with great respect denies the allegation of adultery as set forth in the plaintiff bill and puts said plaintiff on her strictest legal proof.

Fourth, That your respondent is unable to comply with the order of this Honorable Court on the question of alimony and counsel fee, ~~prayed~~ prayed for in the said plaintiff bill _____ Having no property real, personal, no mixed, but depends for a livelihood on his weekly wages as an unskilled laborer.

Fifth, That the plaintiff is not dependent upon your respondent for the livelihood, that your respondent is credibly in form^{ed} and verily believes, that the said plaintiff earns as much if not more than your respondent, per week Having answered all the material allegations and due time your respondent prays that the petition for alimony and counsel fee be hence dismissed with attending costs, and the order of this Honorable Court thereon, be accordingly vacated.

(*John Davis*)
attorney for defendant

and as in duty bound, etc.

P. D. Dan

Solicitor for ~~Respondent.~~

Defendant

Baltimore City, State of Maryland.

I hereby certify that on this the 9th. day of October 1919, before the subscriber a Notary Public, of the State of Maryland in and for Baltimore ^{County} City, aforesaid personally appeared Floyd Hawkins the respondent in the above case and made oath in due form of law that the matter set forth in the above answer, is true to the best of his knowledge and belief.



Arthur L. Rogers
Notary Public.