

3/12/14/91

IN THE CIRCUIT COURT OF

BALTIMORE CITY

62 B 561

FLOYD HAWKINS

1922

VS.

ADA HAWKINS

BILL FOR DIVORCE

Mr. Clerk:-
Please file.

B-24369

(Signature)

DEFENDANT FOR COMPLAINANT

DAVIS & BISHOP

ATTORNEYS AT LAW

BANNEKER BUILDING

14 E. PLEASANT STREET

BALTIMORE, MD.

Ad 2 Oct 1922
11 3 11 11

FLOYD HAWKINS : IN THE CIRCUIT COURT

VS. : OF

ADA HAWKINS : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:-

1. That he was married to his wife, Ada Hawkins on the 10th day of May, 1910 and with whom he resided until about the 28th day of August, 1919.
2. That though the conduct of your Orator toward the said Ada Hawkins has always been kind, affectionate and above reproach, she has, without just cause or reason abandoned and deserted him and has declared her intention to live with him 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 Orator 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 your Orator is a citizen of the State of Maryland residing in Baltimore City for more than three years prior to the filing of this Bill of Complaint but that the defendant is a non-resident of the State of Maryland.

TO THE END, THEREFORE,

- a. That your Orator may be divorced a Vinculo Matrimonii from the said Ada Hawkins.
- b. That he may have such other and further relief as his case may require.

May it please your Honor to grant unto your Orator the Order of Publication directed against the said Ada Hawkins, a non-resident of the State of Maryland aforesaid, commanding and requiring her to be and appear in this Court 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.



SOLICITOR FOR COMPLAINANT.

J. STEWARD DAVIS, SOLICITOR

215 St. Paul Place

IN THE CIRCUIT COURT OF BALTIMORE CITY

Floyd Hawkins Vs. Ada Hawkins

ORDER OF PUBLICATION

The object of this suit is to procure a decree of divorce a vinculo matrimonii by the plaintiff, Floyd Hawkins from the defendant, Ada Hawkins.

The bill states that the parties thereto were married May 10, 1910 and lived together as man and wife until on or about August 28, 1919. That the Plaintiff is a resident of the City of Baltimore, State of Maryland and has been for more than three years prior to the filing of this Bill of Complaint. That the defendant is a non-resident of the City and State and when last heard of was in Washington, D.C. That there are no children born as result of said marriage. That though the conduct of the plaintiff toward his wife was always kind and affectionate and above reproach, she without any just cause or reason abandoned and deserted him and has declared her intention to live with him no longer.

It is thereupon by the Circuit Court of Baltimore City ordered this 3rd day of *October* 1922, that the plaintiff by causing a copy of this order to be inserted in some daily newspaper, published in the City of Baltimore once a week for four successive weeks, before the 3 day of *November* 1922; ~~and~~ give notice to the absent defendant, Ada Hawkins of the object and substance of this bill and warning her to be and appear in this Court in person or by Solicitor on or before the 20 day of *November* 1922 to show cause, if any she may have why a decree should not be passed as prayed.

Carroll J. Bond

62B-361
In the Circuit Court of Baltimore City. 1922

FLOYD HAWKINS

VS.

ADA HAWKINS.

Answer to Bill of Complaint.

B 24369

Mr. Clerk: 3

Please file &c.,

Roy S. Bond
Sol. for Respondent.

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

FILED 3 Nov 1922

FLOYD HAWKINS

VS.

ADA HAWKINS

In the Circuit Court
-of-
Baltimore City.

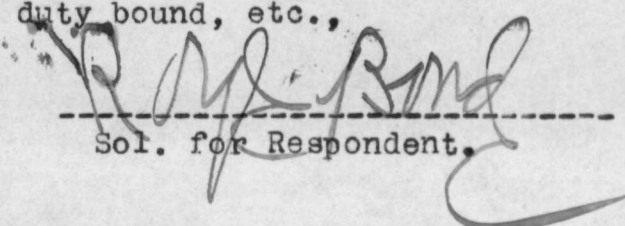
TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Respondent, Ada Hawkins, ~~complainant,~~
in answer to the Bill of Complaint says:

- (1) That she admits the allegations contained in paragraph ONE.
- (2) She denies the allegations contained in paragraph TWO.
- (3) She denies the allegations contained in paragraph THREE.
- (4) She admits the allegations contained in paragraph FOUR.
- (5) She denies the alleagtions contained in Paragraph FIVE.
- (6) She believes her husband, Floyd Hawkins, to be guilty of adultery and reserves the right to introduce testimony in support of her allegations on the day of trial and the right to file a Cross-Bill in these proceedings.

Having answered in so far as she is advised is necessary, she respectfully prays that the bill which has so unjustly been filed against her be dismissed.

As in duty bound, etc.,


Sol. for Respondent.

CIRCUIT COURT

561
1922 Docket No. 62B.

Floyd Hawkins
vs.

Ada Hawkins

ORDER OF APPEARANCE

Mr. Clerk
Please File

Bernard Gibson

Sol. for left.

B 24369

No.

Filed 1 3 day of Nov 1922

Floyd Hawkins

vs.

Ada Hawkins

IN THE
Circuit Court

OF
BALTIMORE CITY

September Term, 1922

MR. WHITEFORD, Clerk.

Enter my appearance for Defendant

Bernard H. Gibson

Solicitor

In the Circuit Court,

Baltimore City.

561
1922

FLOYD HAWKINS

1117 Park Ave.
VS.

ADA HAWKINS.

Petition.

~~B-24369~~

Mr. Clerk,

Please file &c.,

Roy S. Bond
Sol. for Petitioner.

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

FILED

3 Nov 1922

FLOYD HAWKINS

VS.

ADA HAWKINS

In the Circuit Court,
Baltimore City.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Petitioner, Ada Hawkins, respectfully represents as follows:

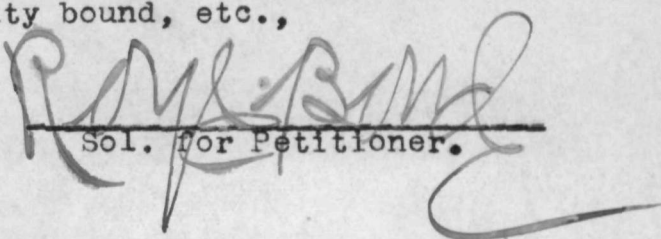
FIRST: That her husband, Floyd Hawkins, heretofore filed a bill for divorce, A Vinculo Matrimonii, in this case, and that the facts therein contained are untrue and without foundation as will appear in her answer hereinafterwards filed.

SECOND: That her husband, Floyd Hawkins, to the best of her knowledge and belief, makes an average wage of THIRTY SIX DOLLARS (\$36.75) SEVENTY FIVE CENTS, per week, as a Ship Corker, and that your Petitioner, Ada Hawkins, is without means to defray her expenses, or to meet the further expenses of this litigation.

WHEREFORE YOUR PETITIONER PRAYS:

- (1) That an order be passed allowing her a regular weekly sum as alimony, pendente lite,
- (2) Counsel fee in such sum as this Court may deem just and proper,
- (3) Such other and further relief as this case may require.

As in duty bound, etc.,


Sol. for Petitioner.

Ada B. Hawkins
Petitioner.

State of Maryland
Baltimore City - to wit-

I hereby certify that on this ^{23rd} day of
October 1922, before me the subscriber, a
Notary Public, of the State of Maryland, in and for
Baltimore City, personally appeared Ada B. Hawkins
Petitioner, in the foregoing proceedings and made oath
in due form of law, that the matter contained in the
foregoing Petition, is true to the best of her knowlede
and belief.

As witness my hand and Notarial Seal.

Eleanora J. Wright
- NOTARY PUBLIC. -

B62 Docket 561
1922

Circuit Court

Hawkins

vs.

Hawkins

1510 E Madison (14)

Order Counsel Fee and Alimony

Pendente Lite

B No. 24369

40 [5] 2268
chd

rd 6 Nov 1922
3

copy of the within Order of Court served on
Hoyd Hawkins on the 14th day of November, 1922
in presence of Edward J. Walsh
F. M. Murphy
Sheriff Thomas

Floyd Hawkins
1510 E ~~Madison~~ ~~1117 Park ave~~
vs.
Ada Hawkins

-IN THE-
CIRCUIT COURT

-OF-
BALTIMORE CITY
Sept TERM

ORDERED BY THE COURT this 6th day of November 1922

that the Plaintiff Floyd Hawkins

pay to the Defendant Ada Hawkins

the sum of Forty⁰⁰ Dollars as Counsel Fee for the

Solicitor of the Defendant and that he further pay the sum of Fifteen⁰⁰

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

as Alimony, *pendente lite*, unless cause to the contrary be shown on or before the 21

day of November 1922, provided a copy of this Order be served on the said Plaintiff

Floyd Hawkins on or before the 16

day of November 1922

Carroll J. Bond

TRUE COPY—TEST:

CLERK

IN THE CIRCUIT COURT

OF

BALTIMORE CITY.

B 561
FLOYD HAWKINS

1922

VS.

ADA HAWKINS

PETITIONER'S ANSWER

Mr. Clerk: -

Please file.

B 24369

ATTORNEY FOR PETITIONER.

24/10/1922
DAVIS & BISHOP
ATTORNEYS AT LAW
BANKER BUILDING
14 E. PLEASANT STREET
BALTIMORE, MD.

FLOYD HAWKINS : IN THE CIRCUIT COURT

VS. :

OF

ADA HAWKINS : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:-

Your Petitioner, Floyd Hawkins respectfully says:-

(1)

That the allegations as contained in the first paragraph of Ada Hawkins' petition for alimony are false.

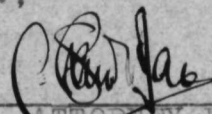
(2)

That your Petitioner is not regularly employed and that Ada Hawkins is not without means to defray the expenses of the suit, for she is regularly employed in Washington, D.C.

WHEREFORE YOUR PETITIONER PRAYS:

(a) That the petition of Ada Hawkins for alimony and counsel fees be dismissed.

AS in duty bound etc.,



ATTORNEY FOR PETITIONER.

J S Davis

561.

192

Ct. Ct.

No. 62 B. Docket

FLOYD HAWKINS

vs.

ADA HAWKINS.

MOTION FOR HEARING

B 24369

No.

7

Roy J Burd
Bernard Gibson

Filed 6 day of Dec 1922

FLOYD HAWKINS

VS.

ADA HAWKINS.

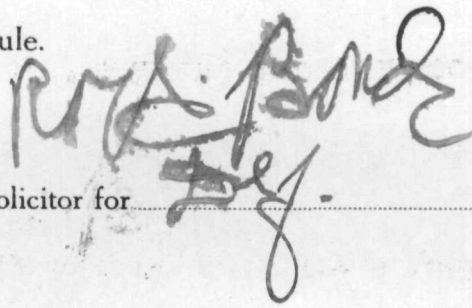
IN THE
CIRCUIT COURT

OF
BALTIMORE CITY

The defendant, Ada Hawkins, by Roy S. Bond,

her Solicitor, applies to have the above entitled cause placed on the Trial Calendar
for hearing on the question of ' ALIMONY AND COUNSEL FEE '

in conformity with the First Equity Rule.


Solicitor for

Serve on
J.S.Davis
Bernard A.Gibson

Ct. Ct.

B-561.....
1922 No. Docket

HAWKINS

vs.

HAWKINS

NOTICE OF HEARING

No. B-24369

8

Filed 7 day of Dec 1922

Copies of the within notice served on J.S.Davis and
Bernard A.Gibson Solicitors on the 11th day
of December 1922 in presence of Harry B. Frank

Fees \$1.00

Thomas F. Maulty
Sheriff

FLOYD HAWKINS

VS

ADA HAWKINS

IN THE

CIRCUIT COURT

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 ALIMONY AND COUNSEL FEE

when reached in due course on said calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court.

Circuit Court

561
19 2nd B 62 No. Docket

Harkins

vs.
Harkins

Final Order, Counsel Fee and Alimony
Pendente Lite.

B 24369

No. B

19

Filed 11 Dec 19 1911

Floyd Hawkins
vs.
Ada Hawkins

IN THE
Circuit Court
OF
BALTIMORE CITY.

Nov. Term, 1922

This cause coming on to be heard upon the petition for Alimony **pendente lite** and Counsel fee, and the answer thereto, and testimony taken, and having been submitted by the solicitors for the respective parties;

Ordered by the Circuit Court of Baltimore City this 11th day of December 1922 that the plaintiff Floyd Hawkins pay to the defendant Ada Hawkins the sum of Twenty five Dollars, as counsel fee for the Solicitor of the defendant Ada Hawkins and that he further pay the sum of Six Dollars per week, to the said defendant Ada Hawkins as Alimony **pendente lite** accounting from the _____ day of _____ 19____ and continuing until the _____ day of _____ 19____, (should this suit be so long pending) or until the further order of this Court.

And that the said amount above mentioned six Dollars per week be paid each week through the Prisoner's Aid Society

Carroll J. Bond

In the Circuit Court

Baltimore

561
1922

FLOYD HAWKINS

VS.

ADA HAWKINS

ADA HAWKINS

VS.

FLOYD HAWKINS.

1510 E. MADISON ST.

Cross Bill.

B 24369

10

Mr. Clerk:--

Please file &c.,

Roy S. Bond
Sol. for Complainant
in Cross Bill.

ROY S. BOND

ATTORNEY AT LAW

215 ST. PAUL PLACE

BALTIMORE, MD.

FILED

24 Jan 1923

FLOYD HAWKINS

VS.

ADA HAWKINS

IN THE CIRCUIT COURT

Cross Bill

ADA HAWKINS

BALTIMORE CITY.

VS.

FLOYD HAWKINS

TO THE HONORABLE, THE JUDGE OF SAID COURT,

Your Complainant in the Cross Bill, Ada Hawkins, respectfully represents to the Court as follows:

(1) That heretofore Floyd Hawkins, the husband of this Complainant, filed his Bill of Complaint, against her in this Honorable Court, alleging among other things that this Complainant had, without just cause or reason, abandoned and deserted him.

(2) That this Complainant has answered said Bill of Complaint, and in her answer has shown that the said Floyd Hawkins, is not entitled to the relief in this Honorable Court, and she also denied all the material allegations alleged in said bill and each paragraph thereof.

(3) That the Complainant in the Cross Bill, Ada Hawkins, and the respondent in the Cross Bill, Floyd Hawkins were married on the 10th day of May, 1910, and lived together as man and wife until on or about the 28th day of August, 1919.

(4) 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.

(5) That there are no children as issue to this marriage.

(6) That though the conduct of your Cratrix, towards the said Floyd Hawkins, has always been kind, affectionate, and above reproach, he has, without just cause or reason, abandoned and deserted her and has declared his intentions to live with her 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.

(7) That the respondent in the Cross Bill, the said Floyd Hawkins, has committed the crime of adultery with divers, lewd women, whose names will be disclosed on the day of trial, and that the said acts were committed without her procurement, connivance or consent, and that she has not lived nor cohabited with the said defendant, since she discovered the same.

WHEREFORE, the premises considered the Complainant in the Cross Bill prays as follows:-

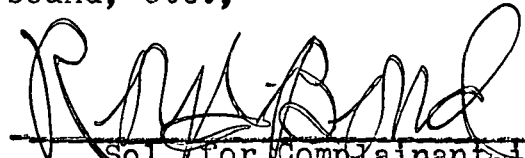
-a- That she may be divorced A Vinculo Matrimonii, from the respondent in the Cross Bill, the said Floyd Hawkins, her husband,

-b- That she may resume her maiden name,

-c- Such other and further relief as the case may require.

May it please your Honor, to grant unto your oratrix, Ada Hawkins, the writ of subpoena, directed unto the said defendant, Floyd Hawkins, residing 1510 E. Madison Street, commanding him to be and appear in this Honorable Court, 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 Complainant in
Cross Bill.

Ada B. Harkins
Plaintiff in ~~Case~~
Cross-Bill.

State of Maryland
Baltimore City to wit-

I hereby certify that on this 23rd day of October
1924, before me the subscriber, a Notary Public, in and
for Baltimore City, personally appeared Ada B. Harkins,
Plaintiff, in Cross-Bill, and made oath in due form of
law, that the matter contained in the foregoing proceed-
ings are true to the best of her knowledge and belief.

As witness my hand and Notarial Seal.

Eleonora S. Wright
-NOTARY PUBLIC.-

170
561
21
62
192 Docket No. Ct. Ct.

FLOYD HAWKINS
VS
ADA HAWKINS

ADA HAWKINS
VS
FLOYD HAWKINS
1510 E. Madison st.,

Cross
SUBPOENA TO ANSWER BILL OF COMPLAINT

No. *Pro*
24369
5117

Roy S. Bond
Sol. for Complainant
in Cross-Bill

Filed *12 Feby* 192 *3*

SOLICITOR

4

*Summons Floyd Hawkins and a copy
of the process left with the defendant
(Moylan)
1-27/23
Thomas F. Moylan
Sheriff*

EQUITY SUBPOENA

The State of Maryland

To

FLOYD HAWKINS

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 FEBRUARY next Cross-Bill of cause an appearance to be entered for you and your answer to be filed to the complaint of

ADA HAWKINS
ADA HAWKINS

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 January 1923
Issued the 20nd day of January, in the year 1923

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.)

IN THE CIRCUIT COURT

62 OF 561
BALTIMORE CITY.

FLOYD HAWKINS

1922

VS.

ADA HAWKINS

CROSS BILL

ADA HAWKINS

VS.

FLOYD HAWKINS

RESPONDENT'S ANSWER

Mr. Clerk:-

Please file.

324369

J. Steward Davis

Attorney for Respondent
in Cross Bill.

DAVIS & BISHOP
ATTORNEYS AT LAW

BANNEKER BUILDING

4 E. PLEASANT STREET
BALTIMORE, MD.

22 JAN 1923

FLOYD HAWKINS :
VS.
ADA HAWKINS : IN THE CIRCUIT COURT

Cross Bill
ADA HAWKINS :
VS. OF
FLOYD HAWKINS : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The answer of the respondent in the Cross Bill of the above case exhibited is as follows:

- (1) He admits statements as contained in the Complainant's first paragraph.
- (2). He neither admits nor denies allegations as contained in the second paragraph.
- (3). He admits the allegations as contained in the third paragraph of the Complainant's Bill.
- (4). He admits the allegations as contained in the fourth paragraph of the Complainant's Bill.
- (5). He admits the allegations as contained in the fifth paragraph of the Complainant's Bill.
- (6). He denies with great emphasis the allegations as contained in the sixth paragraph of the Complainant's Bill.
- (7). He denies with great emphasis the allegations as contained in the seventh paragraph of the Complainant's Bill.

Wherefore the respondent prays that the Complainant's Cross Bill be dismissed.

J. Steward Davis
Attorney for Respondent in Cross Bill

Circuit Court No. 2

- 561 -

192

Docket 623

Floyd Hawkins

vs,

Ada Hawkins.

Cross ~~vs~~ Bill.

Ada Hawkins

vs,

Floyd Hawkins.

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

DWH 24369
No.

Satt (13)

Filed 23 January, 1923

Floyd Hawkins

vs.

Ada Hawkins

Cross --vs. Bill.

Ada Hawkins

vs.

Floyd Hawkins.

IN THE

Circuit Court No. 2,

OF

BALTIMORE CITY.

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

THE PETITION OF Ada Hawkins,

Complainant in Cross Bill

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

Raymond Bond
Solicitor for Complainant,
in Cross Bill.

ORDERED, this 23rd day of January 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.

Henry Duffey

3/12/14/91

Doc. 2 561
1922

In the Circuit Court,
OF BALTIMORE CITY

DEPOSITIONS

Ada Hawkins

vs.

Floyd Hawkins

No. 2,4369B

PLAINTIFF'S COSTS

Examiners.....	\$ <u>8⁰⁰</u>
Copies.....	_____
Sheriff.....	_____
Stenographer.....	<u>2⁵⁰</u>
	\$ <u>10⁵⁰</u>

DEFENDANT'S COSTS

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

A. G. Feby 1923

Ada Hawkins

vs.

Floyd Hawkins

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-third* day of *January* 19*23*, met on the *twenty-third* day of *January* in the year nineteen hundred and *twenty-three* at my office, in the City of Baltimore, in the State of Maryland, and assigned the *twenty-third* day of *January* in the same year at *three* o'clock in the *after* noon and the office of *Roy Bond, Esq.* 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 *S* of the *respective parties* to take the following depositions, that is to say:—

8-250-93

Hawkins v

v.

Hawkins.

Testimony taken at the office of Roy S. Bond, Esq.,
115 St. Paul Place, Baltimore, Maryland, January
23rd., 1923, at three O'clock P. M

Ada Hawkins, the Plaintiff in this case, pro-
duced on her own behalf, having been first duly
sworn, deposes and saith as follows, that is to say:

By the Examiner:

1 Q. State your name residence and occupation?

A. Ada Hawkins, 607 North Charles Street; Domestic.

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

A. I am the Plaintiff and my husband is the De-
fendant.

By Mr. Bond:

1 Q. When, where and by whom were you married?

A. November 5th., 1910, by the Reverend Mr. Hill

2 Q. And when your husband says in his original
bill that you were married on the 10th., May 1910; that
is a mistake, is it?

A. Yes.

3 Q. When were you actually married?

A. November 5th., 1910.

Ada Hawkins

4 Q. In what City and State were you married?

A. Baltimore, Maryland.

5 Q. Was the Reverend that married you a Regularly Ordained Minister of the Gospel?

A. Yes.

6 Q. Connected with what Church?

A. The Bethel M. E. Church.

7 Q. Are you living together now?

A. No.

8 Q. Did you leave your husband or did your husband leave you?

A. I left him.

9 Q. Why?

A. Because I could not stand his treatment, and he told me that he wanted me to get out of his house.

11 Q. And what did he do after he told you to get out; what did he do afterwards.

A. He went to live with another woman.

12 Q. And on the 28th., August 1919, you say that he told you, - what?

A. He told me to get out and that he did not want me in the house, and he went to live with this woman at 1324 McCulloh Street.

Ada Hawkins.

13 Q. Had you said anything to him about not being able to stand his treatment?

A. Yes.

14 Q. What was his treatment?

A. He was always nagging at me, and he would hit at me and hit me, at different times.

15 Q. Did he hit you?

A. Yes.

16 Q. When?

A. Well, just a little before I left him.

17 Q. Where?

A. In the face.

18 Q. How often did he beat you?

A. Well, just once in a while.

19 Q. Well, now, did he provide for your support as a husband should?

A. Sometimes he did and sometimes he did not.

20 Q. When he told you to get out on the 28th., August 1919, was he providing for you as a husband should?

A. No.

21 Q. Could you stand his treatment any longer?

A. No sir; I could not; I stood it as long as I could.

22 Q. Your husband has filed a bill for divorce

Ada Hawkins.

on the ground of abandonment; did he have any grounds for that divorce?

A. No sir; he did not.

23 Q. You deny the charges contained therein, do you?

A. Yes.

24 Q. And you say that they are absolutely untrue?

A. They certainly are.

25 Q. Have you and your husband been residents of Baltimore City, State of Maryland, for more than two years prior to the filing of this suit?

A. Yes.

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

A. No sir.

27 Q. Has this separation and abandonment continued uninterruptedly for more than three years prior to the filing of this suit?

A. Yes.

28 Q. Did he have any just cause or reason to abandon and desett you and putting you outiin the manner in which he did?

A. He did not.

Ada Hawkins.

29 Q. Was his going away and his treatment of you his own deliberate and final act?

A. Yes.

30 Q. Is there any hope or expectation of a reconciliation?

A. No.

31 Q. Have you ever lived with him since he lived with this woman up there on McCulloh Street; you have not lived or cohabited with him since he commenced to live in open adultery, have you?

A. No sir.

32 Q. Were these acts committed without your procurement or connivance or consent?

A. Yes.

33 Q. And your witnesses know more about his adultery than you?

A. Yes.

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

A. No.

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.

Ada Hawkins

Julia Wilson, a witness of lawful age, produced on behalf of the Plaintiff, having been first duly sworn, deposes and saith as follows, that is to say:

By the Examiner:

1 Q. State your name residence and occupation?

A. Julia Wilson, 303 North¹ Stricker Street; chiropodist.

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

A. Yes.

By Mr. Bond:

1 Q. Do you remember when the parties to this suit lived together as husband and wife?

A. Yes; I do.

2 Q. In what City and State?

A. Baltimore, Maryland.

3 Q. Did you have occasion to visit them?

A. Very often.

4 Q. How did he treat his wife?

A. He treated her very mean, as far as I could see. He was even after other women during the time that he was living with her.

5 Q. And how did she treat him?

A. As a wife should treat a husband.

6 Q. Do you remember when they separated?

A. Yes.

Julia Wilson.

7 Q. When?

A. August 28th., 1919.

7 Q. Do you know the cause of the separation?

A. Him running with other women, and treating her mean and otherwise.

8 Q. Could she stand his treatment any longer?

A. No sir.

9 Q. Was she always a kind, affectionate and true wife towards her husband?

A. Very.

10 Q. Has he declared his intention never to live with his wife any more?

A. He has.

11 Q. Has this separation continued uninterruptedly for at least three years prior to the filing of this suit?

A. Yes; it has.

12 Q. Was it his own deliberate and final act?

A. Yes; it was.

13 Q. Is there any hope or expectation of a reconciliation?

A. No; I think not.

14 Q. Has she ever lived or cohabited with him since he commenced to live in open adultery with a woman?

A. No sir.

Julia Wilson.

15 Q. Or since she found out that he was cohabiting with her?

A. No sir.

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

A. No.

18 Q. Have both the parties to this suit been residents of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit?

A. Yes.

18 Q. Did she treat him in every particular as a wife should and do a wife's part.

A Yes.

20 Q. Tell me, if you please, about his living up on McCulloh Street with this woman.

A. I did not know him on McCulloh Street; I only heard of that, but I know that he lived at 312 North Stricker Street on the opposite side from me, in a two story house with this woman.

21 Q. With this woman?

A. Yes; with this woman, Louise Snowden.

22 Q. Did they live and cohabit in your house as husband and wife?

A. Yes; they did; everybody in the neighborhood was under the impression by him telling them so

Julia Wilson.

23 Q. Did he tell you.

A. No sir, but he told people in my presence.

24 Q. And they still living together as husband and wife.

A. I do not know whether they are or not, but they did.

25 Q. Did'nt you see her name in the telephone book.

A. Yes; her name on Park Avenue, - she goes by his name - Louise Hawkins.

26 Q. They lived together as husband and wife after theseparation, and that was their reputation among the people that knew them.

A. Yes; they moved there, and I thought that he was in that business; he had a move wagon, and I asked him how long he was in that business, and I asked him what it meant, and he said "I am moving in this house, that is what it means", and she brought me the key and asked me to give it to ~~the~~ the gas man when he came to turn on the gas, because she would not be home.

27 Q. They lived there during what years?

A. 1919, 1920 and 1921, I think.

28 Q. After the separation.

A. Yes; after the separation. / No one lived in the house but those two.

Julia Wilson.

29 Q. Has Mrs. Hawkins in any way condoned or forgiven her or taken her back since this adultery?

A. No sir.

30 Q. Is there any hope or expectation of their living together any more?

A. I think not.

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.---

Julia Wilson

Jesse Snowden, a witness of lawful age, produced on behalf of the Plaintiff, having been first duly sworn, deposeseth and saith as follows, that is to say:

By the Examiner:

1 Q. State your name residence and occupation?

A. Jesse Snowdwn, 1525 Leslie Street; University Hospital porter.

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

A. Yes.

By Mr. Bond:

1 Q. Mr. Snowden, would you mind telling us who took your wife away from you.

A. Floyd Hawkins.

2 Q. Did they live together after she left you?

A. They did.

3 Q. And do you know where they lived?

A. The first place they lived was at 1324 McCulloch Street, and then at 312 North Stricker Street.

4 Q. Did you have occasion to go there?

A. I saw them there myself in my presence.

5 Q. About when?

A. During the summer of 1919; the latter part of 1919, getting avidence for my case.

6 Q. Then what did you find?

A. I found that they were living there as husband and wife, and she was carrying Hawkins name.

Jesse Snowden.

7 Q. Did you see them in the same house together?

A. Yes.

8 Q. Just they, and no one else in the house.

A. Both of them.

9 Q. Both living together as husband and wife?

A. Yes.

10 Q. Do you know anything about her having his name in the telephone book?

A. In the telephone book she went by the name of Hawkins; I know of her going by the name of Louise Hawkins in the Fall issue of last year.

12 Q. Have both the parties to this suit been residents of Baltimore City, State of Maryland, for more than two years prior to the filing of this suit?

A. They have.

13 Q. How did the Plaintiff treat her husband.

A. The way that a wife should treat a husband.

14 Q. Do you know anything about his conduct which -- Do you know anything about her conduct which caused him to leave the home?

A. I do not.

15 Q. How did he treat her; she says that she was abused and beaten and kicked by him.

A. I do not know anything about the abusing part, but I know about his running around with women; I know

Jesse Snowden.

that because he was running with my wife at that time. Or, at least running after her.

16 Q. Has the Plaintiff lived or cohabited with her husband since she discovered that he was living with your wife?

A. She has not.

17 Q. Have both the parties to this suit been residents of Baltimore City, State of Maryland, for at least two years prior to the filing of this suit?

A. Yes; they have.

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

A. No sir.

19 Q. Is there any hope or expectation of their living together any more?

A. None whatever.

20 Q. Did she give her husband any just cause or reason for his conduct towards her?

A. She did not.

21 Q. Is your wife and the Defendant still living and cohabiting together as husband and wife yet.

A. Yes.

22 Q. And for sometime before that.

A. Yes; right straight along.

Jesse Snowden.

33 Q. Do you remember when the parties to this suit lived together as husband and wife and introduced themselves to people as husband and wife?

A. Yes.

34 Q. Have the parties to this suit been separated for more than three years prior to the filing of this suit continuously and uninterruptedly?

A. Yes.

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
Jesse Snowden

No other witnesses being named or produced before me, I then, at the request of the Solicitor o of the respective parties closed the depositions taken in said cause and now return them closed under my hand and seal, on this 5th day of February in the year of Our Lord nineteen hundred and twenty-three at the City of Baltimore, in the State of Maryland.

Adm. Sappington (SEAL).
Examiner.

There are no Exhibits with these depositions, to wit:
Plaintiff's Exhibit

Defendant's Exhibit

Adm. 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 now by the Defendant.

Adm. Sappington
Examiner.

~~Cir. Ct. No. 2.~~

561

192

Docket No. 62B

Floyd Hawkins

vs.

Ada Hawkins

~~Cross vs. Bill.~~

Ada Hawkins

vs.

Floyd Hawkins.

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file,

B 2 4 369

[Handwritten Signature]

Solicitor for Plaintiff.
in Cross-Bill.

No.

Filed *6 Feb 15* 192

Floyd Hawkins

vs.
Ada Hawkins

Ada Hawkins

vs.
Floyd Hawkins.

In the Circuit Court ~~No. 2~~
Of Baltimore City.

January

TERM 1923-

To the Honorable

The

Judge of the Said Court:

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

Raymond Bond

Solicitor for Plaintiff,
in Cross-Bill.

P. H. Jam

Solicitor for Defendant.
in Cross-Bill.

753
19 22 262 Docket No.

Hankins

vs.
Hankins

Order of Reference.

24369
16



Filed 6 day of July 19 23

Floyd Hankins
vs.
Ada Hankins

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

Jan Term, 19 23

This case being submitted, without argument, it is ordered by the Court, this 6 day of February 1923, that the same be and is hereby referred to Alex H. Robertson Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

A. H. Robertson

Report of Auditor and Master

Bill filed by husband against wife for a divorce a vinculo matrimonii for abandonment for three years, and cross bill by wife against husband for same for same and adultery Code Art 16. S. 36

Defendant in original and cross bills and answer by solicitor.

Proof shows marriage residence and adultery of defendant in answer. The plaintiff in cross bill to resume her maiden name.

Submitted and ready for decree
Alex H. Robertson
Auditor and Master

CIRCUIT COURT

B 753
1922. B No. 62 Docket

Hawkins
vs. Hawkins
Homes vice
vs.
Hawkins
Hawkins

Recorded

Folio 31 192 3

Decree of Divorce

B No. 24369

17

fd. 8th February 1923

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

Alex W. Robertson
Auditor and Master.

Circuit Court

OF

BALTIMORE CITY

Floyd Hawkins

VS.

Ada Hawkins
Cross bill

Ada Hawkins
Floyd Hawkins

January

Term, 1923

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

It is thereupon, this *8th* day of *February*, A. D. *1923*

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

Ada Hawkins

the above named Complainant ^{*in cross bill*} be and she is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, *in cross bill* *Floyd Hawkins*

and plaintiff to be permitted to resume her maiden name, and that the original bill of Floyd Hawkins vs. Ada Hawkins be dismissed

And it is further Ordered, That the said *Floyd Hawkins* pay the cost of this proceeding.

Floyd Hawkins

Henry Duff