

In The Circuit Court  
of

Baltimore City

vs  
Jacob Meekins  
1930

Helen Meekins

Bill for Justice & Verdict

Wm. Clark please file  
(*Wm. Clark*)

B21833

(1)

DAVIS & BISHOP  
ATTORNEYS AT LAW  
118 E. LEXINGTON STREET  
BALTIMORE, MD.

fd 16 Nov 1940

Jacobs Meekins : In The Circuit Court  
vs. : of  
Helen Meekins : Baltimore City.

---

To The Honorable, The Judge of Said Court:

Your Orator complaining, respectfully states:

FIRST, that the parties hereto were married on or about May 12th. 1913 by a Methodist minister at Chester Pa. and lived together as man and wife until on or about June 22nd. 1920.

SECOND, That both parties are residents of the city of Baltimore, state of Maryland and have been for more than two years prior to the filing of this bill of complaint.

THIRD, That though the conduct of your orator toward his wife has always been kind, affectionate and above reproach, she without any just cause or reason abandoned and deserted him to live in adultery with lewd and abandoned men whose names are unknown to your Orator.

FOURTH, That your orator has never condoned nor forgiven the said adultery, that he has never cohabited with the said respondent since the crime of the said adultery.

FIFTH, That there are no children as a result of said marriage.

THEREFORE YOUR ORATOR PRAYS:

a-a A divorce a vinculo matrimonii from the respondent.

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

May it please Your Honor to grant unto your orator a Writ of Subpoena, directed unto the said respondent commanding her to be or appear in this Court on some day certain to be named therein, to perform such decree as may be passed in the premises.

As in duty bound etc.

Jacet McKin  
Complainant

(C. H. Jew)  
Solicitor For Complainant.

395

709 Blue Ct. Ct.

192 9 Docket No.

Meekins 11/17/20

Meekins

Pr

SUBPOENA TO ANSWER BILL OF COMPLAINT

1432 E Monument

No.

21833

(2)

Filed

4 2 Nov 1920

J. Steward Davis SOLICITOR

3

Summoned and a copy of the process left with the defendant.

Thomas J. M. Pugh Sheriff

(Finkelstein) 11/17/20

Fee \$0.80

EQUITY SUBPOENA

The State of Maryland

To

*Helen Meekins*

of Baltimore City, Greeting:

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Circuit Court of Baltimore City, at the Court House in said City, on the second Monday of *December* 1920, to answer the complaint of

*Jacob Meekins*

--- against you in said Court exhibited.

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

WITNESS, the honorable MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *8* day of *November* 1920

Issued the *16* day of *November* in the year 1920

*Chas R. Whiteford* Clerk.

Notice to the person summoned:

"Personal attendance in Court on the day named in the above writ is not required; but unless within fifteen (15) days after the return day, legal defense is made in the above mentioned suit a Judgment by default may be entered against you."

709  
1920.

In the  
Circuit Court  
of  
Baltimore City.

-----  
Jacob Meekins  
Vs  
Helen Meekins  
-----

Answer of Defendant  
to Bill of Complaint.  
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Mr. Clerk:  
Please file.

*Howard Sweeten*  
Solicitor for Defendant.

B 21833

(B)

fd 14 Dec 1920

Jacob Meekins        ::  
                      Vs                :  
                                      :  
Helen Meekins        ::

In the  
Circuit Court  
of  
Baltimore City.

To the Honorable, the Judge of said Court:

The Answer of Helen Meekins to the Bill of Complaint, respectfully represents unto Your Honor as follows:

1. That she admits the marriage of the parties hereto, their residence and that no children are living as the result of said marriage, as setforth in the first, second and fifth paragraphs of the Bill of Complaint.

2. That she denies the allegations contained in the third and fourth paragraphs of the Bill of Complaint, and calls for strict proof of the same.

Having answered the Bill of Complaint as fully as she is advised this defendant therein prays to be dismissed, with her costs.

And, as in duty bound, etc.,

*Howard A. Sweeten*  
Solicitor for Defendant.

J. S. Davis

13

CIRCUIT COURT

709  
19 20 Bleo Docket No.

James Meekins

vs.

Jelen Meekins

Serve on

Howard A. Sweeten

Sol.

PETITION AND ORDER TO  
TAKE TESTIMONY UN-  
DER 35th RULE

B  
No. 21833  
(4) [Signature]

Fd 8 Feb 19 21

Howard A. Sweeten

Copy of this within-Petition and Order of Court served on  
Howard A. Sweeten Solicitor on the 15th day of  
February 1921 in presence of Harry B. Brant  
Thomas E. McNulty  
Sheriff  
Fees \$50



Jacob Meekin

Helen Meekin <sup>vs.</sup>

IN THE  
Circuit Court  
OF  
BALTIMORE CITY

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 therefore 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.

Solicitor for Plaintiff.

Upon the foregoing Petition and Application it is this 8<sup>th</sup> day of February  
A. D., 1921, Ordered that the petitioner have leave to take testimony as prayed and that the testimony to be  
offered be taken as required by the 35th Rule of this Court. And it is further Ordered that a copy of this  
petition and order be served on the Defendant or her Solicitor, on or be-  
fore the 18<sup>th</sup> day of February 1921

**CIRCUIT COURT**

*709*  
*19 20* *Bleo* Docket No.

*Meekins*

vs.

*Meekins*

Order

19

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

*B* 21833

No.

*Sapf* (5)

*17 July 1921*

Fd

Jacob Meekins

vs.

Helen Meekins

IN THE  
Circuit Court  
OF  
BALTIMORE CITY

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

THE PETITION OF *Jacob Meekins*

in this case, respectfully shows that *Jacob Meekins* desire to take testimony in this case, and respectfully pray that leave be granted to do so before one of the Standing

Examiners of this Court. *and that the order proposed be set aside for referring the hearing in open court be and is hereby recommended*

*Robert Davis*  
Solicitor for

ORDERED, this *17th* day of *Feb.* 19*27* 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. *and that order in this case for hearing in open court be and same is hereby recommended*

*W. H. Kinsler*

*I assent to above order*  
*Howard A. Sweeten*  
*Solr for Deft*

7/12/13

Doc. 73  $\frac{709}{1920}$

**In the Circuit Court,**  
OF BALTIMORE CITY

**DEPOSITIONS**

*Jacob Muekins*

vs.

*Helen Muekins*

No. *2153373*

**PLAINTIFF'S COSTS**

Examiners.....\$ *8<sup>00</sup>*  
Copies.....  
Sheriff.....  
Stenographer.....*1<sup>00</sup>*  
\$ \_\_\_\_\_

**DEFENDANT'S COSTS**

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

*fd 23 May 1921*

Jacob McKinis

vs.

Helen McKinis

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  
seventeenth day of February 1921, met on  
the seventeenth day of February in the year nineteen  
hundred and twenty-one at my office, in the City of Baltimore, in the State  
of Maryland, and assigned the seventeenth day of February  
in the same year at three o'clock in the afternoon and the  
office of J. Stewart Davis, 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 of the  
plaintiff to take the following depositions, that  
is to say:—

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Meekins,

v.

Meekins.

Testimony taken at the office of Messrs Stewart and Davis, East Pleasant Street, Baltimore, Maryland, February 17th., 1921, at 3 O'clock P. M.

JACOB MEEKINS, the Plaintiff in this case, produced on his own behalf, 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. Jacob Meekins, 809 North Stirling Street; chauffeur.

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

A. I am the Plaintiff and my wife is the Defendant.

BY MR. DAVIS:

1 Q. Kindly state when, where and by whom you were married?

A. May.

2 Q. What date.

A. The 1918.,

3 Q. Where?

A. Chester, Pennsylvania.

4 Q. Do you remember the Minister's name?

A. Jones, I think.

5 Q. A Methodist Minister?

Jacob Meekins.

A. Yes.

6 Q. Are you and your wife living together now?

A. No sir.

7 Q. You lived together as husband and wife up until what time?

A. Until June 22nd., 1920.

8 Q. What was the cause of the separation?- There was a separation at that time, was there?

A. Yes.

9 Q. Which left the other; did you leave her or did she leave you?

A. I left her.

10 Q. Why?

A. Unfaithfulness.

11 Q. She was unfaithful to you.

A. Yes.

12 Q. Whom did you find out that she was going with; what was the name?

A. Tommy.

13 Q. Who told you about it,- Your sister told you about it, I suppose; how did you discover that she was unfaithful.

A. Through my sister.

14 Q. Were you away working?

A. Yes.

Jacob Meekins.

15 Q. Where did you live together at the time; in Baltimore?

A. Yes; in Baltimore.

16 Q. Where?

A. On East Monument Street.

17 Q. And it was after the separation occurred?

A. Yes.

18 Q. Did you discover that your wife received mail from other men while you were working?

A. Yes.

19 Q. Then you discovered that this man Tommy was coming to see your wife?

A. Yes.

20 Q. And after that discovery, your wife had you at the northeastern police station on a charge of desertion and non-support?

A. Yes.

21 Q. Before you filed your Bill for Divorce?

A. Yes.

22 Q. Did your wife make any admissions at that time about living with this other man?

A. Yes.

23 Q. What did she say?

A. She said that she had a man living with her, but that he had left her.



Jacob Meekins.

but that he had left her.

24 Q. Did she admit her adulteries?

A. Yes.

25 Q. Was this between the time that you left her and the filing of this Bill?

A. Yes.

26 Q. Now, what was your conduct towards your wife while living with her; were you always kind and affectionate.

A. Yes.

27 Q. Did you support her?

A. Yes.

28 Q. Did you give her any cause or reason to be unfaithful to you?

A. No sir.

29 Q. Are you a resident of Baltimore City, State of Maryland; if so, how long have you been here?

A. I was born here.

30 Q. You and your wife are residents of Baltimore City.

A. Yes.

31 Q. And now a resident of Baltimore City.

A. Yes.

32 Q. Have you condoned or forgiven her unfaithful-

Jacob Meekins.

ness?

A. No sir.

33 Q. Have you lived or cohabited with her since you discovered that she was unfaithful?

A. No sir.

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

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.---

*W*  
*Jaest Welkin*

IDA MEEKINS, 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. Ida Meekins, 809 Stirling Street; laundry.  
2 Q. Do you know the parties to this suit?  
A. Yes.

BY MR. DAVIS:

- 1 Q. The Plaintiff is your brother?  
A. Yes.  
2 Q. Where did you live June 22nd., 1920.  
A. I lived on Monument Street.  
3 Q. What number?  
A. 1432 .  
4 Q. You lived with your brother and his wife?  
A. Yes.  
5 Q. While your brother was away in Pennsylvania, and you and his wife was living at 1432 Monument Street, what did you find out about her.

WITNESS: What do you mean.

COUNSEL: What did you find out about her relations with another man? Did any mail come there.

A. I did not see any mail, but I was sitting at the window when a man came up and she asked him to

Ida Meekins.

take her down to this new Park, and his name was Arthur Bannan, and he said "I dont like to do that on Jake; he is too good a man" and his wife said "O, that is all right; he is a nice man; he dont mind that".

6 Q. Did she say anything to you about letters being under the carpet.

A. No sir; not to me.

7 Q. At the time you slept in the same bed with Mrs. Meekins.

A. Yes.

8 Q. What happened one night?

A. Tommy came there, and, of course, she and Tommy went upstairs in the bed room, and I could not get in until after they came down.

9 Q. You could not get in until they came down?

A. No sir.

10 Q. How long were they in there?

A. About three or four hours.

11 Q. What time did you finally get to bed.

A. I did not get in bed until about half past twelve; I could not get in on account of them.

12 Q. Were you present at the Northeastern Police Station?

A. Yes.

Ida Meekins.

13 Q. Did you hear her admit that she was living as the common law wife of another man?

A. Yes.

14 Q. In between the time that your brother left his wife and the filing of this Bill of Complaint, - that was when this took place?

A. Yes.

15 Q. Has your brother been a resident of Baltimore City, State of Maryland, for more than two years prior to the filing of this suit?

A. Yes.

16 Q. What was his conduct towards his wife while living together; was he always a kind, affectionate and true husband?

A. Yes; he was kind.

17 Q. And did he support her?

A. Yes; she did not do anything at all.

18 Q. Did he give her any cause or reason to be unfaithful towards him?

A. I dont see where he gave her any cause.

19 Q. And he has never condoned or forgiven her offense since he discovered it?

A. No sir.

20 Q. And he has never lived with her since he discovered that she was unfaithful to him?

Ida Meekins.

A. No sir.

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

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*

*Ida McKim*



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

BY THE EXAMINER:

1 Q. State your name residence and occupation?

A. Emma Curtis, 809 North Stirling Street; home work.

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

A. Yes.

BY MR. STEWART:

1 Q. Mr. Meekins is your brother.

A. Yes; my brother.

2 Q. You were not present at the Ceremony?

A. No sir.

3 Q. But they lived together as husband and wife at 1432 East Monument Street, in Baltimore City?

A. Yes.

4 Q. Did you visit them?

A. I lived with them there.

5 Q. You know their reputation in the community as husband and wife?

A. Yes.

6 Q. And you know that they held themselves out as husband and wife in the community?

A. Yes.

Emma Curtis.

7 Q. Did you ever have any conversation with Mrs. Meekins about some letters?

A. Yes; she was telling me about the letters that she was hiding, and she took them out, and she said that she was going to burn them up; she got the letters from Tommy while he was in Pennsylvania.

8 Q. Why was she going to burn them up.

A. Because she did not want her husband to see them.

9 Q. She said they were from Tommy?

A. Yes.

10 Q. Did you see Tommy come to the house.

A. No sir.

11 Q. You never saw him come to the house.

A. No sir.

12 Q. Did you ever see any other man?

A. Yes; this man Arthur.

13 Q. Did you hear her say anything.

A. She wanted him to take her out, and he did not want to do it, and she said that it was allright, that her husband was a good man, and that he did not mind that.

14 Q. Were you ever at the Police Station.

A. Yes.

15 Q. Did you hear her make any admission there?

A. Yes.

Emma Curtis.

16 Q. What did she say?

A. She said the man was going with her, but had stopped going with her, and that is why she tried to get money from her husband.

17 Q. She said that she was living with this man?

A. Yes.

18 Q. Living together as husband and wife?

A. Yes.

19 Q. And who was this man?

A. Tommy.

20 Q. And that was between the time, of the separation and the time of the filing of the Bill for Diverce?

A. Yes.

21 Q. Has the Plaintiff been a resident of Baltimore City, State of Maryland, for more than two years prior to the filing of this suit?

A. Yes.

22 Q. And is the Plaintiff a resident of Baltimore City, State of Maryland?

A. Yes.

23 Q. What was his conduct towards his wife?

A. He was good to her, and true to her, and whatever she wanted she got.

Emma Curtis.

24 Q. Did she have to work?

A. No sir.

25 Q. And was he kind and affectionate?

A. Yes.

26 Q. Did he give her any cause or reason to be unfaithful to him?

A. No sir.

27 Q. Has he ever condoned or forgiven these adulteries?

A. No sir.

28 Q. And has he ever lived with her since he discovered these adulteries?

A. No sir.

29 Q. There are no children born of said marriage?

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*

*Emma Curtis*

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 23 day of May in the year of Our Lord nineteen hundred and twenty-one at the City of Baltimore, in the State of Maryland.

A. de Russey Sappington (SEAL).  
Examiner.

There are no Exhibits with these depositions, to wit:

Plaintiff's Exhibit.....

Defendant's Exhibit.....

A. de Russey 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 Russey Sappington  
Examiner.

709  
709  
19 21

Circuit Court

Docket No. \_\_\_\_\_

Jacob Meebur

vs.

Helen Meebur

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file,

*[Signature]*

Solicitor for Plaintiff.

21833  
~~22531~~

No. \_\_\_\_\_

7  
Filed 23 May 1921

*Jacob Meekins*

vs.  
*Helen Meekins*

*In the Circuit Court  
of Baltimore City*

\_\_\_\_\_ TERM 19 \_\_\_\_

To the Honorable

\_\_\_\_\_  
Judge of Said Court:

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

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
*(Signature)*

Solicitor for Plaintiff,

\_\_\_\_\_  
*Howard Sweeten*

Solicitor for Defendant.



Circuit Court

709  
19 20

Docket No. ....

Meekins

vs.

Meekins

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Order of Reference  
and Report

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B 21833

No. 8

Order Filed 23 day of May 1921  
Report Filed 29 day of July 1921

Jacob Meekins

vs.

Helen Meekins

IN THE  
Circuit Court  
OF  
BALTIMORE CITY

May

Term, 19

21

23

This case being submitted, without argument, it is ordered by the Court, this day of May, 1921, that the same be and it is hereby referred to Ward B. Cole, Esq., Auditor and Master, to report the pleadings and the facts, and his opinion thereon.

Ward B. Cole

Report of Auditor and Master

Bill for divorce a vinculo matrimonii filed by the husband against his wife on the ground of adultery. Code 1911, 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 adultery proven.

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

Case submitted and ready for decree.

Ward B. Cole

Auditor and Master.

Fee \$9 paid.

May 24th, 1921.

CIRCUIT COURT

B -709-

1920.

No. 60 Docket

JACOB MEEKINS

VS.

HELEN MEEKINS

Recorded

Folio 199 1921

Decree of Divorce

B 21823

B

No.

9

A 2 August 1921

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

*Mary B. Cline*

Auditor and Master.

Decree of Divorce

IN THE

**Circuit Court**

OF

BALTIMORE CITY

JACOB MEEKINS

VS.

HELEN MEEKINS

*July*

Term, 1921.

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

It is thereupon, this *2<sup>nd</sup>* day of *August*, A. D. 1921,

by the Circuit Court of Baltimore City, Adjudged, Ordered and Decreed, that the said - - - - -  
*Jacob Meekins* - - - - -

the above named Complainant be and he is hereby DIVORCED A VINCULO MATRIMONII from the Defendant, *the said Helen Meekins.*

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

*Carroll J. Bond*