

In The Circuit  
B 315  
Court of Baltimore  
1921

James Rawling

vs

Sadie Rawling

Bill for Justice A. U. ...

Mr Clerk please file

~~John ...~~

B 22610

(1)

DAVIS & BISHOP  
ATTORNEYS AT LAW  
BANNEKER BUILDING  
14 E. PLEASANT STREET  
BALTIMORE, MD.

filed June 1921

James Rawlings

In The Circuit Court

vs.

of

Sadie Rawlings

Baltimore City.

-----  
To The Honorable, The Judge of Said Court:

Your orator complaining, respectfully says:-

FIRST, that the parties hereto were married on or about March 17, 1909, in Baltimore City by Rev. Gwynn, a minister of the gospel and lived together as man and wife until on or about May 15, 1916.

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 and has declared her intentions to live with him no longer; that such abandonment has continued uninterruptedly for more than three years prior to the filing of this bill of complaint and was deliberate and final, and beyond any reasonable hope or expectation of reconciliation.

FOURTH, that your orator has never condoned nor forgiven the said desertion, that he has never co-habited with the said respondent since the desertion.

FIFTH, that there are no children born as a result of this marriage.

THEREFORE YOUR ORATOR PRAYS:

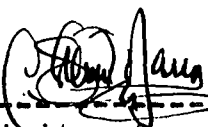
a-a A divorce a Vinculo Matrimonii from the respondent.

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.

-----  
Complainant

  
-----  
Solicitor for Complainant.

115

Ct. Ct.

375  
1921 B61

Docket No.

Rawlings

Sadie's

Rawlings

very recessed or

SUBPOENA TO ANSWER BILL OF COMPLAINT

Pr

No.

322610  
(2)

Filed

7 July  
J. S. Curtis

1921

SOLICITOR

11

Summored and a Copy of the Process left  
with the defendant -

Thomas D. McKeith  
Sheriff

(Attach  
6/20-21)

Free \$0.80



EQUITY SUBPOENA

The State of Maryland

To

*Sadie Rawlings*

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

*James Rawlings*

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 MORRIS A. SOPER, Chief Judge of the Supreme Bench of Baltimore City, the *9* day of *May* 192 *1*

Issued the *21* day of *June*, in the year 192 *1*

*Clark 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.)

CIRCUIT COURT

315 B61  
1921 Docket No.

James Rawlings  
vs.

Sadie Rawlings

ORDER OF APPEARANCE

Mr. Clerk

Please File

Thos. J. Skane  
Sol. for Respondent

By 22610  
No.

(3)

Filed 15 day of July 1921

*James E. Rawlings*  
vs.

*Sadie Rawlings*

IN THE  
**Circuit Court**  
OF  
BALTIMORE CITY

*Term, 19*

Mr. WHITEFORD, Clerk.

*Enter my appearance for Defendant*

*Thos. J. Kane*

Solicitor

IN THE CIRCUIT COURT FOR  
BALTIMORE CITY.

*B* *315*  
*1921*

JAMES RAWLINGS

VS

SADIE RAWLINGS

---

A N S W E R

---

Mr. Clerk,

Please file, etc.

*B22610*

*(4)*

*Thomas J. Spane*

Solicitor for defendant.

*Ed 214 St. Paul St*  
*July 1921*

JAMES RAWLINGS  
VS  
SADIE RAWLINGS

IN THE CIRCUIT COURT FOR  
BALTIMORE CITY.

TO THE HONORABLE THE JUDGE OF SAID COURT:

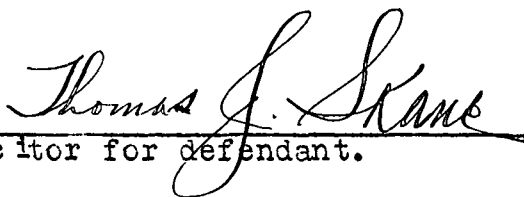
The answer of Sadie Rawlings, the defendant in the above entitled cause, respectfully shows;

1. She admits the allegations contained in the first and second paragraphs of the said Bill of Complaint. That she vehemently denies all the material allegations contained in the third and fourth paragraphs of ~~said~~<sup>said</sup> Bill of Complaint, and further states that the plaintiff abandoned and deserted your oratrix without any just cause or reason.

2. She admits the allegations contained in the fifth paragraph of the said Bill of Complaint.

And having answered said Bill of Complaint fully, this respondent prays that she may hence be dismissed with her proper costs.

And as in duty bound, etc.

  
Solicitor for defendant.

*B 315*  
IN THE CIRCUIT COURT FOR  
BALTIMORE CITY *921*

---

JAMES RAWLINGS

VS

SADIE RAWLINGS

---

PETITION FOR ALIMONY  
COUNSEL FEE.

---

Mr. Clerk,

Please file, etc.

*B 22610*

*(5)*  
*Thomas J. Skane*  
Solicitor for defendant.

214 Saint Paul St.

*cd 18 July 1921*



JAMES RAWLINGS  
vs  
SADIE RAWLINGS

IN THE CIRCUIT COURT OF  
BALTIMORE CITY.

TO THE HONORABLE THE JUDGE OF SAID COURT:

The petition of Sadie Rawlings, the defendant in the above entitled cause respectfully shows;

1. That the plaintiff has filed his bill in this Court for a divorce a vinculo matrimonii from your petitioner on the grounds of abandonment, as will more fully appear by reference to said bill of complaint.

2. That your petitioner altogether denies said charge and affirms that when said cause comes on to be heard, it will be seen that said charge is entirely untrue and destitute of foundation.

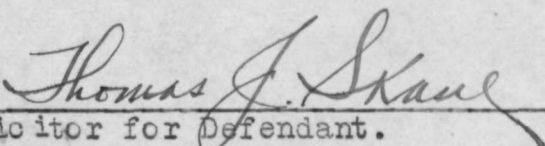
3. That your petitioner is without means of her own, and only receives whatever help her people chose to give her.

4. That your petitioner is advised that she is entitled to have an order passed by this Court requiring the plaintiff to pay her a reasonable sum as alimony pendente lite for her personal support, and also a reasonable sum to enable her to defray the necessary expenses of her defense and to compensate the counsel whom she has employed to defend this suit.

5. That the plaintiff is employed and earns a salary of about \$35.00 per week.

Your petitioner therefore prays your Honor to pass an order requiring the said James Rawlings to pay her as alimony pendente lite such a sum as this Court may seem proper, and also to require the plaintiff to pay a reasonable fee to her counsel.

And as in duty bound, etc.

  
Solicitor for Defendant.



1053 m/yr  
B 315  
1921

Rawlins

Rawlins  
Argyle & Hoffmann

B 22610

(6)  
\$35 - a week  
for children (8)  
(9)  
Thos Skane

fd 19 July 1921  
" 29 July 1921  
" 28 Oct 1921

Nov Dec -

Thomas F. McVerty  
Sheriff

(Attach Return)  
or is card  
(Kelly)  
3rd Return  
Wm Con  
(Kelly)  
4th Return

Thomas F. McVerty  
Sheriff

Thomas F. McVerty  
Sheriff

Copy of the within Order of Court served on James  
Rawlins on the 10th day of October 1921 in presence of  
John B Kelly.

Thomas F. McVerty  
Sheriff

Fee \$0.50

JAMES RAWLINGS  
vs  
SADIE RAWLINGS

IN THE CIRCUIT COURT OF  
BALTIMORE CITY.

Ordered this 19<sup>th</sup> day of July 1921 by the  
Circuit Court for Baltimore City, that the plaintiff,  
James Rawlings pay the sum of Eleven dollars  
per week to the Defendant as alimony pendente lite, and  
it is further ordered that the Plaintiff James Rawlings  
pay the sum of Thirty Dollars as counsel fee for the  
Solicitor for the Defendant, unless cause to the contrary  
be shown on or before the 17 day of August 1921, pre-  
vided a copy of this order be served on the said James  
Rawlings on or before the 28 day of July 1921.

James M. Coulter

The foregoing Order having been returned "Non Est" as appears by  
the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City  
this 7<sup>th</sup> day of August 1921, that the time for showing cause  
under said Order be extended to the 17 day of August 1921,  
and the time for service of a copy of the same be extended to the 6 day of  
August 1921.

Carroll J. Bond

The foregoing Order having been returned "Non Est" as appears by  
the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City  
this 7 day of October 1921, that the time for showing cause  
under said Order be extended to the 22 day of October 1921,  
and the time for service of a copy of the same be extended to the 15 day of  
October 1921.

Charles H. Hensler,

The foregoing Order having been returned "Non Est" as appears by  
the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City  
this 8<sup>th</sup> day of September 1921, that the time for showing cause  
under said Order be extended to the 23 day of Sept 1921,  
and the time for service of a copy of the same be extended to the 17 day of  
Sept 1921.

Robert F. Staunton



3/12/14/35

In The Court of  
of  
Baltimore City

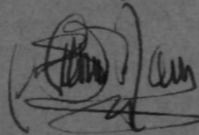
James Hawley

vs

Sadie Hawley

Arrested for trespassing

Wm. H. Hense Jr



822610

(16)

DAVIS & BISHOP

ATTORNEYS AT LAW

BANNEKER BUILDING

14 E. PLEASANT STREET

BALTIMORE, MD

fd 24 Oct 1921

JAMES RAWLINGS

::::

IN THE CIRCUIT COURT

VS

OF

SADIE RAWLINGS

::::

BALTIMORE CITY.

.....

TO THE HONORABLE, THE JUDGE OF SAID COURT:

THE answer of your orator to the petition of the respondent in the above entitled cause respectfully shows that your petitioner does not earn thirty five dollars(\$35.00) per week as alleged in the petition of the defendant.

WHEREFORE your orator prays that the order of Court passed by this Honorable Court August 4th. 1921 be dismissed.



-----  
ATTORNEY

J. S. Davis

42

145  
1921

No.

Ct. Ct.  
Docket

James Rawlings  
vs.

Sadie Rawlings

MOTION FOR HEARING

B 22610

No.

11

Filed 24 day of Oct 1921

Thos Skane



James Rawlings

vs.

Sadie Rawlings

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

The defendant by Thomas J. Shane  
for Solicitor, applies to have the above entitled cause placed on the Trial Calendar

for hearing on alimony pendente lite and  
Counsel Fee

in conformity with the First Equity Rule.

Solicitor for Thomas J. Shane  
Defendant

Serve on

J.S.Davis

B-315		Ct. Ct.
1921	No.	Docket

Rawlings

vs.

Rawlings

**NOTICE OF HEARING**

B No. 22610  
12

No.  
Filed 27 day of Oct 1921

Copy of the within notice served on J.S. Davis Solicitor  
 on the 31st day of October 1921 in presence of  
 Morris Finkelshtein Thomas J. McQuilty  
 Sheriff  
 Fees \$0.50

JAMES RAWLINGS

VS

SADIE RAWLINGS

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 Pendente Lite & Counsel fee*

*when reached in due course on said Calendar.*

**CHARLES R. WHITEFORD**

*Clerk Circuit Court*

Circuit Court

315  
1921 B 61 No. Docket.

James Rawlings  
vs.

Sadie Rawlings

Final Order, Counsel Fee and Alimony  
*Pendente Lite.*

B 22610

No. B.

12 1/2

Filed 31 Oct 1921

Rawlings  
vs.

Rawlings

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY.

Term, 19

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 31st day of October 1921, that the plaintiff, James Rawlings pay to the defendant, Sadie Rawlings the sum of Fifteen Dollars, as counsel fee for the Solicitor of the defendant and that he further pay the sum of three Dollars per week, to the said Sadie Rawlings as Alimony *pendente lite* accounting from the 1st day of November 1921, and continuing until the \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_, (should this suit be so long pending) or until the further order of this Court.

Pay direct to defendant.

Charles H. Hester



315

CIRCUIT COURT

315-861  
19 2/ Docket No.

James Rawlins  
vs.

Sadie Rawlins

Order 19

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

B 22610  
No.

(13)

Fd 7 Nov 19 21

*James Rowlin*

vs.

*Sadie Rowlin*

IN THE  
Circuit Court  
OF  
BALTIMORE CITY

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

THE PETITION OF *plaintiff*

in this case, respectfully shows that *he* desire *s* to take testimony in this case, and respectfully pray *o* that leave be granted *him* to do so before one of the Standing Examiners of this Court.

*[Signature]*

Solicitor for *plaintiff*

ORDERED, this *7* day of *November* 19 *17*, 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.

*W. H. H. H. H. H.*



Serve on

Ct. Ct.

3157

B 61-5  
1921

James Rawlings

vs.

Sadie Rawlings

ORDER OF COURT

B 22610

No. 22610 B.

14

Filed 1 December 1921  
11 12 18 9

CIRCUIT COURT

BALTIMORE CITY

Wm East  
(12/11)

2nd Return

copy of the within Order of Court served on James Rawlings &  
on the 15th day of December 1921 in presence of John B

(Velly)

Jan 10. 50

Thomas F. McWaltz  
Sheriff

Thomas F. McWaltz  
Sheriff

*James Rawlings*  
 vs.  
*Ladie Rawlings*

IN THE  
**CIRCUIT COURT**  
 OF  
**BALTIMORE CITY**

Ordered by the Circuit Court of Baltimore City this *1<sup>st</sup>* day of *December* 192*1*  
 that the *Plaintiff* appear before this Court in person,  
 on the *12* day of *December*, 19*21* at 10 o'clock A. M., and then and there show cause,  
 if any he may have, why he should not be punished for contempt of this Honorable Court in not obey-  
 ing the Order of this Court passed on the *17<sup>th</sup>* day of *October*, 19*21*, directing the  
 payment of Alimony, pendente lite, by him to the *defendant.*  
 provided a copy of this Order be served on the said *Plaintiff*  
 on or before the *8* day of *December*, 19*21*

*Walter H. Miller*

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this 12<sup>th</sup> day of December 1921, that the time for showing cause under said Order be extended to the 19 day of December 1921, and the time for service of a copy of the same be extended to the 16 day of December 1921.

*Wm. H. Miller*

Serve on

Ct. Ct.

61

B 315  
1914

James Rawlings

vs.

Sadie Rawlings

ORDER OF COURT

B 22610

No. .... B.

16

Filed 30 Dec 1914

10

Copy of the within Order of Court served on James Rawlings on the 3rd day of January 1922 in presence of John B Kelly. Thomas F. McCarroll Sheriff Dec 20 1914

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY

*James Rawlings*  
vs.

*Sadie Rawlings*

Ordered by the Circuit Court of Baltimore City this *30<sup>th</sup>* day of *December*, 19*27*

that the *plaintiff* appear before this Court in person,

on the *4* day of *January*, 19*28*, at 10 o'clock A. M., and then and there show cause,

if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying

the Order of this Court passed on the *31<sup>st</sup>* day of *October*, 19*27*, directing the

payment of Alimony, pendente lite, by him to the *Defendant*

provided a copy of this Order be served on the said *Plaintiff*

on or before the *3* day of *January*, 19*28*

*Charles H. Hester*

Serve on

Ct. Ct.

61 B 528  
1921

James Rawlings  
vs.  
Sadie Rawlings

ORDER OF COURT

B 22610

No. 17 B. 18

Filed 10 Jan 1922  
" 30 " 1922  
10

Wm Lee (Kelly) 2nd Return  
Thomas F. McShelley Sheriff  
Thomas B. McShelley Sheriff  
(Kelly)



IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

James Rawlings

vs.

Sadie Rawlings

Ordered by the Circuit Court of Baltimore City this 10 day of January, 1921  
that the plaintiff James Rawlings appear before this Court in person,  
on the 16 day of January, 1921, at 10 o'clock A. M., and then and there show cause,  
if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying  
the Order of this Court passed on the 23<sup>rd</sup> day of October, 1921, directing the  
payment of Alimony, pendente lite, by him to the Defendant  
provided a copy of this Order be served on the said Plaintiff  
on or before the 13 day of January, 1921

Carroll J. Bond



The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this 20<sup>th</sup> day of January 1922, that the time for showing cause under said Order be extended to the 30 day of January 1922, and the time for service of a copy of the same be extended to the 26 day of January 1922.

Carroll T. Bond

Serve on

Ct. Ct. <sup>315</sup> 61 B <sup>815</sup>  
1922

James Rawlings

vs.

Sadie Rawlings

ORDER OF COURT

*Plus Same*

*B 22610*

No. B.

*19*

Filed *23 July* 1922

*10*

*Wm Earl Thomas Jr. McCullough  
(Kelly) Sheriff*

IN THE

CIRCUIT COURT

OF

BALTIMORE CITY

James Rawlings

vs.

Sadie Rawlings

Ordered by the Circuit Court of Baltimore City this <sup>23<sup>rd</sup></sup> 22<sup>nd</sup> day of ~~January~~ February 1912

that the plaintiff, James Rawlings appear before this Court in person,

on the 27 day of February 1912 at 10 o'clock A. M., and then and there show cause,

if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying

the Order of this Court passed on the 23<sup>rd</sup> day of October 1912 directing the

payment of Alimony, pendente lite, by him to the Defendant

provided a copy of this Order be served on the said Plaintiff

on or before the 25 day of February 1912

*Not Payable thru Pro and asso Carroll J. Bond*

Serve on

Ct. Ct.

B 191

JAMES RAWLINGS

vs.

SADIE RAWLINGS

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**ORDER OF COURT**

---

---

No. .... B.

*Copy*

Filed ..... 191

JAMES RAWLINGS

IN THE

CIRCUIT COURT

vs.

OF

BALTIMORE CITY

SADIE RAWLINGS

Ordered by the Circuit Court of Baltimore City this... ~~23rd~~... day of ... ~~February~~..... 19~~19~~22  
 that the... ~~plaintiff, James Rawlings~~..... appear before this Court in person,  
 on the... ~~27th~~ day of... ~~February~~....., 19~~19~~22, at 10 o'clock A. M., and then and there show cause,  
 if any he may have, why he should not be punished for contempt of this Honorable Court in not obeying  
 the Order of this Court passed on the.... ~~23rd~~.. day of... ~~October~~..... 19~~19~~22 , directing the  
 payment of Alimony, pendente lite, by him to the.... ~~defendant~~.....  
 provided a copy of this Order be served on the said.... ~~plaintiff~~.....  
 on or before the..... ~~25th~~ day of... ~~February~~..... 19~~19~~22 .

CARROLL T. BOND

Not Payable thru Pris, Aid Asso,

TRUE COPY  
TEST,

*Chas R. Whiteford* CLERK



Serve on

Ct. Ct.

B <sup>608</sup>  
192 1

315

James Rawlings

vs.

Sadie Rawlings

ORDER OF COURT

1416 Myrtle Ave.

B 22610

No. B.

20

Filed

6 July

192 2

Thos S. Kane 14

Thomas F. McNulty  
Sheriff

Now Est  
(Brooks)

IN THE  
CIRCUIT COURT  
OF  
BALTIMORE CITY

James Rawlings  
vs.  
Sadie Rawlings

Ordered by the Circuit Court of Baltimore City this 6<sup>th</sup> day of July, 1922  
that the Complainant James Rawlings appear before this Court in person,  
on the 17 day of July, 1922, at 10 o'clock A. M., and then and there show cause,  
if any he may have, why he should not be punished for contempt of this Honorable Court in not obey-  
ing the Order of this Court passed on the 31st day of October, 1921, directing the  
payment of Alimony, pendente and Counsel fee lite, by him to the Sadie Rawlings  
provided a copy of this Order be served on the said James Rawlings  
on or before the 14 day of July, 1922

Has paid \$17.50 since order  
was passed.  
Has not paid Counsel Fee

Henry Duff

Not payable through  
Prisoners Aid Society  
1124 Broadway, N.Y.C.

The foregoing Order having been returned "Non Est" as appears by the Sheriff's return thereon; it is Ordered by the Circuit Court of Baltimore City this.....day of.....192....., that the time for showing cause under said Order be extended to the.....day of.....192....., and the time for service of a copy of the same be extended to the.....day of.....192......



Serve on

Ct. Ct.

B \_\_\_\_\_  
192

JAMES RAWLINGS

vs.

SADIE RAWLINGS

ORDER OF COURT

1416 Myrtle ave

No. .... B.

COPY.

Filed ..... 192





628

19 21

Cir. Ct.

B No. 61

Rawlins  
vs.

Rawlins

Attachment in Equity.

B. No. 22610

121

Filed 15 day of Sept 19 21

Thomas F. McVetty  
Sheriff

Wm. P. Kelly  
(Kelly)



(ATTACHMENT IN EQUITY)

MARYLAND, Sc.

The State of Maryland.

To the Sheriff of Baltimore City, Greeting:

You are Hereby Commanded, that you attach the body of

*James Rawlings*

if he shall be found in your bailiwick, and to take keep, so that you have him before

the Judge of the Circuit Court, of Baltimore City, at the Court house in the same city, on

the *18* day of *September* 19*22*, at *10 AM*, to answer as well touching a certain contempt

by him committed in not

*obeying order of Court*

as well as to such other matters and things as shall be then and there alleged against him

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 *11* day of *September* 19*22*

Issued the *15* day of *September* 19*22*

*Clark H. Whiteford*  
Clerk.

*Let above attachment issue*  
*Canall J. Bond*

Doc. 73 315  
1921

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

**DEPOSITIONS**

*James Rawlings*

vs.

*Sadie Rawlings*

No. 22610 B.  
(22)

**PLAINTIFF'S COSTS**

Examiners.....\$ 5<sup>00</sup>  
Copies.....  
Sheriff.....  
Stenographer.....2<sup>00</sup>  
\$ \_\_\_\_\_  
\_\_\_\_\_

**DEFENDANT'S COSTS**

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

5 Jan 1928.

James Rawlins

vs.

Sadie Rawlins

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 *seventh* day of *November* 19*21*, met on the *nineteenth* day of *November* in the year nineteen hundred and *twenty-one* at my office, in the City of Baltimore, in the State of Maryland, and assigned the *twenty-first* day of *November* in the same year at *three* o'clock in the *after-*noon and the office of *Messrs Davis & Bishop* 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:—

8-2.

BY THE EXAMINER: I desire to call the Court's attention to the fact, that during the course of the taking of testimony in this case, it was discovered that the Plaintiff spells his name "Rollins" instead of Rawlins, in which name the suit was instituted and the Defendant summoned.



Rawlings,

v.

Rawlings.

Testimony taken at the office of Bishop and Davis,  
Pleasant Street, Baltimore, Maryland, November 21st.,  
1921, at 3 O'clock P. M.

JAMES RAWLINGS, the Plaintiff in this case,  
produced on his own behalf, 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. James Rawlings, 1053 Myrtle Avenue; hod carried.

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

A. I am the Plaintiff and my wife is the Defen-  
dant.

BY MR DAVIS:

1 Q. When where and by whom were you married to  
the Defendant?

A. I was married by the Reverend Mr. Gwinn.

2 Q. Of what Church?

A. The Methodist.

3 Q. In Baltimore?

A. Baltimore, Maryland.

4 Q. When?

James Rawlings.

A. 17th., of March.

5 Q. What year?

A. 1909.

6 Q. Now, were you married by the Reverend Mr.

Gwinn, Pastor of the Methodist Church in Baltimore  
City March 17th., 1909?

A. Yes.

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

A. No sir.

8 Q. Which left the other?

A. She did.

9 Q. State the circumstances surrounding your  
wife's abandoning you.

A. I found out that my brother ran with her, and  
I told her that he was to pick up and leave, and she  
told me one evening that if I made him move that she  
would go.

10 Q. Did you make him go ?

A. Yes.

12 Q. What did she do?

A. That I do not know how long it was after when I  
came home from work in the afternoon she had moved,  
and taken everything out of the house.

12 Q. Now, state about when your wife moved and took  
everything out of the house; about what month it was and  
what year?

James Rawlings.

A. In 1915, I think it was.

13 Q. The Bill states that it was May 15th., 1916?

A. Yes; it was somewhere along there; I can not remember exactly the time; it was about that time.

14 Q. Did you do your duty as a faithful and true husband should do towards his wife.

A. Yesz

15 Q. Did she have any just cause or excuse for abandoning you?

A. No sir.

16 Q. Did you provide for your wife a good and comfortable home with the necessaries of life as best your circumstances would permit you to do?

A. Yes.

17 Q. How long have you lived in Baltimore City, State of Maryland?

A. Fifteen years.

18 Q. How long has your wife lived in Baltimore City, State of Maryland?

A. She has lived here about the same length of time if not longer; longer, I guess.

19 Q. Is there any hope of a reconciliation between you and your wife?

A. No sir.

20 Q. That is, do you think that your wife will ever

James Rawlings.

come back to live with you again?

A. No sir; never.

21 Q. State why you say that there is no hope of a reconciliation between you and your wife; is it because she went away with this man, and has not come back since?

A. Yes.

22 Q. At any time since May 15th., 1916, the time that your wife abandoned and deserted you, have you lived or cohabited with her?

A. No sir.

23 Q. Has the abandonment of you by your wife been deliberate and final and continuous and final for a period of three years prior to the time you filed your Bill for divorce?

A. Yes.

24 Q. State how long it has been, when it was and how long it has been? You said that your wife abandoned you May 15th., 1916, has it been ever since then?

A. Yes.

25 Q. At any time since May 15th., 1916, has your wife lived or cohabited with you?

A. No sir.

26 Q. Are there any children 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

James E. Rallins



JEROME ROLLINS, 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. Jerome Rollins, Elkridge, Maryland; I am not doing anything at the present time.

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

A. Yes.

BY MR. DAVIS:

1 Q. Were you present at the marriage?

A. No sir.

2 Q. Do you know whether or not Mr. Z and Mrs. Rollins lived together as husband and wife and were they received into society and among their friends as husband and wife?

A. Yes.

3 Q. You lived in the house with them did you not?

A. Yes.

4 Q. Are they living together now?

A. No sir.

5 Q. Which left the other?

A. She left me.

6 Q. About when did that occur?

A. About the middle of May.

7 Q. 1916?

Jerome Rollins.

A. 1916.

8 Q. Since about the middle of May 1916, have the parties to this suit lived or cohabited together?

A. No sir.

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

A. No sir.

10 Q. During the time that the parties to this suit lived together as husband and wife, did he do his full duty as a good and kind and affectionate wife should have done towards his wife?

A. Yes.

11 Q. Did he provide for her a good and comfortable home, and give her the necessaries of life, as best his position in life would permit him to do?

A. Yes.

12 Q. Has the abandonment of Mr. Rollins by his wife been continuous and final for a period of more than three years prior to the time this suit was filed?

A. Yes.

13 Q. Has it been continuous and uninterrupted?

A. Yes.

14 Q. How long has it been; ever since when.

A. Ever since the month of May 1916.

15 Q. How long have Mr. and Mrs. Rollins lived in Baltimore City, State of Maryland, to your know-

Jerome Rollins.

ledge?

A. About fifteen years.

16 Q. Are there any children of this marriage?

A. No sir.

18 Q. Do you think there is any hope of a reconciliation?

A. No sir.

18 Q. Why do you think there is no hope of a reconciliation.

A. There is none, because she got up and left him .

19 Q. With whom; was it about another man.

A. Yes; with his brother.

20 Q. And you know -- And for that reason you dont think that they will ever live together again.

A. No sir; I dont think that she will ever come back any more.

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

Jerome Rollins.

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 <sup>for safekeeping</sup> closed under my hand and seal, on this fourth day of January in the year of Our Lord nineteen hundred and twenty-eight 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.