

IN THE CIRCUIT COURT FOR CHARLES COUNTY, MARYLAND

MARLYNN DICKSON

Plaintiff

vs.

PIERRE D. DICKSON

Defendant

**FILED**

JUN 26 2012

CIRCUIT COURT  
FOR CHARLES CO., MD.

CASE NO. 08-C-12-001142

ANSWER

COMES NOW, the Defendant, Pierre D. Dickson, by and through his attorney, William Z. Haskell, HASKELL & ZIMMERMAN, and in answer to the Complaint for Absolute Divorce or in the Alternative Complaint for Limited Divorce, Custody and Other Relief, respectfully states as follows:

1. Defendant admits the allegations contained in paragraph 1.
2. Defendant admits the allegations contained in paragraph 2.
3. Defendant admits the allegations contained in paragraph 3.
4. Defendant denies that he abandoned and deserted the Plaintiff as stated in paragraph 4 and further states that Plaintiff's conduct forced him to leave. Defendant admits that the separation has continued uninterruptedly since September 13, 2011.
5. Defendant denies the allegations contained in paragraph 5.
6. Defendant admits the allegations contained in paragraph 6.
7. Defendant admits the allegations contained in paragraph 7.
8. Defendant admits that the Plaintiff and minor child of the parties are residing

in a home acquired by the parties during their marriage and is titled in Defendant's name solely and was used as their principal residence but denies that the minor child has a need to reside there as stated in paragraph 8.

9. Defendant admits the family home has been foreclosed as stated in paragraph 9 but denies all other allegations.

10. Defendant admits the allegations contained in paragraph 10.

11. Defendant admits the allegations contained in paragraph 11.

12. Defendant denies the allegations contained in paragraph 12 A and further states the home has been foreclosed. Defendant admits the allegations contained in paragraphs 12 B, C and D. Defendant admits the allegations contained in 12 E but denies that it is marital property. It is a disability retirement in which Plaintiff has no interest.

13. Defendant denies the allegations contained in paragraph 13.

14. Defendant denies the allegations contained in paragraph 14.

15. Defendant admits Plaintiff is employed but denies that she is earning less than Defendant as stated in paragraph 15. Defendant is unemployed.

16. Defendant denies he is employed as stated in paragraph 16 but admits that he does receive a disability pension from the Prince George's County Police Department which Plaintiff has no interest.

17. Defendant admits the allegations contained in paragraph 17.

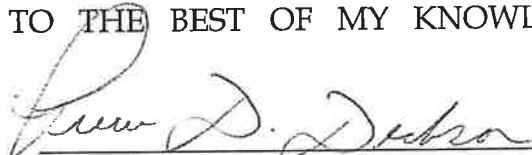
18. Defendant denies the allegations contained in paragraph 18 and further states that he has paid over \$2,000.00 per month for benefit of family since he left.

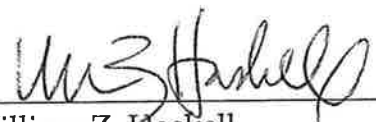
19. Defendant admits that he provides health insurance as stated in paragraph 19 but denies that there is no cost to him as stated in paragraph 19.

**WHEREFORE**, the Defendant respectfully prays:

1. That he be granted a divorce on the grounds of voluntary separation;
2. That Plaintiff's prays be denied;
3. For such other and further relief as the nature of this case may require.

I DO HEREBY SOLEMNLY DECLARE AND AFFIRM UNDER THE PENALTIES OF PERJURY, THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING ANSWER ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

  
\_\_\_\_\_  
Pierre D. Dickson

  
\_\_\_\_\_  
William Z. Haskell  
Attorney for Defendant  
HASKELL & ZIMMERMAN  
14825 Pratt Street  
P. O. Box 1299  
Upper Marlboro, Maryland 20773  
(301) 627-5844

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 22<sup>ND</sup> day of June 2012 a copy of the foregoing was mailed first class, postage prepaid to Cameron A. Methner, Esquire, 11705 Berry Road, Suite 202, Waldorf, Maryland 20603.

  
\_\_\_\_\_  
William Z. Haskell

**CIVIL - DOMESTIC CASE INFORMATION REPORT**

**DIRECTIONS:**

*Plaintiff: This information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Judge of the Court of Appeals pursuant to Rule 2-111. A copy must be included for each defendant to be served.*

*Defendant: You must file an Information Report as required by Rule 2-323(h).*

**THIS INFORMATION REPORT CANNOT BE ACCEPTED AS AN ANSWER OR RESPONSE**

FORM FILED BY:  PLAINTIFF  DEFENDANT CASE NUMBER 08-C-12-001142  
Clerk to insert

CASE NAME: MARLYNN DICKSON vs. PIERRE D. DICKSON  
Plaintiff Defendant

PARTY'S NAME: Pierre D. Dickson PHONE: ( ) -  
Day Time Phone

ADDRESS:

PARTY'S ATTORNEY'S NAME: William Z. Haskell PHONE: ( 301 ) 627 - 5844

ATTORNEY'S ADDRESS: P. O. Box 1299, Upper Marlboro, MD 20773

I am not represented by an attorney  
 RELATED CASE PENDING?  Yes  No If yes, Court and case #(s) if known: \_\_\_\_\_

Special Requirements?  Interpreter (Please attach Form CC-DC 41)  
 ADA accommodation (Please attach Form CC-DC 49)

**ALTERNATIVE DISPUTE RESOLUTION INFORMATION**

Is this case appropriate for referral to an ADR process under Md. Rule 17-101? (Check all that apply)  
 A. Mediation  Yes  No C. Settlement Conference  Yes  No  
 B. Arbitration  Yes  No D. Neutral Evaluation  Yes  No

IS THIS CASE CONTESTED?  Yes  No If yes, which issues appear to be contested?

- Ground for divorce
- Child Custody  Visitation
- Child Support
- Alimony  Permanent  Rehabilitative
- Use and possession of family home and property
- Marital property issues involving:
  - Valuation of business  Pensions  Bank accounts/IRA's  Real Property
  - Other: \_\_\_\_\_
- Paternity
- Adoption/termination of parental rights
- Other: \_\_\_\_\_


Request is made for:  Initial order  Modification  Contempt  Absolute Divorce  Limited Divorce

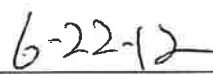
For non-custody/visitation issues, do you intend to request:  
 Court-appointed expert (name field) \_\_\_\_\_  Mediation by a Court-sponsored settlement program  
 Initial conference with the court  Other: \_\_\_\_\_

For custody/visitation issues, do you intend to request:  
 Mediation by a private mediator  Appointment of counsel to represent child (not just to waive psychiatric privilege)  
 Evaluation by mental health professional  A conference with the Court  
 Other Evaluation \_\_\_\_\_

Is there an allegation of physical or sexual abuse of party or child?  Yes  No

CASE NAME _____	vs.	CASE NUMBER: _____
<small>Plaintiff</small>		<small>(Clerk to Insert)</small>
<b>TIME ESTIMATE FOR A MERITS HEARING:</b> _____ hours _____ days		
<b>TIME ESTIMATES FOR HEARING OTHER THAN A MERITS HEARING:</b> _____ hours _____ days		
<b>COMPLEX SCIENCE MEDICAL CASE MANAGEMENT PROGRAM (ASTAR)</b>		
<i>FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO AN ASTAR RESOURCE JUDGE under Md. Rule 16-202. Please check the applicable box below and attache a duplicate copy of your complaint.</i>		
<input type="checkbox"/> Expedited - Trial within 7 months of filing <span style="margin-left: 150px;"><input type="checkbox"/> Standard - Trial within 18 months of filing</span>		

  
 \_\_\_\_\_  
Signature of Counsel/Party  
**William Z. Haskell**  
 \_\_\_\_\_  
Print Name  
**P. O. Box 1299**  
 \_\_\_\_\_  
Street Address  
**Upper Marlboro, MD 20773**  
 \_\_\_\_\_  
City/State/Zip

  
 \_\_\_\_\_  
Date

IN THE CIRCUIT COURT FOR CHARLES COUNTY, MARYLAND

MARLYNN DICKSON

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Plaintiff

\*

vs.

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Case No. 08-C-12-1142

**FILED**

PIERRE D. DICKSON

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Defendant

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JUN 18 2012

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CIRCUIT COURT  
FOR CHARLES CO., MD.

MOTION FOR ALTERNATIVE SERVICE

The Plaintiff, Marlynn Dickson, by and through her attorneys, Cameron A. Methner and Andrews, Bongar, Gormley & Clagett, P.A., as their Motion for Alternative Service, states as follows:

1. That the Plaintiff has filed a Complaint for Absolute Divorce and in the Alternative a Complaint for Limited Divorce together with this Motion.

2. That the Plaintiff is unaware of the exact whereabouts of Defendant, Pierre Dickson, in that she believes he may be living in Upper Marlboro, Maryland.

3. That the Plaintiff has had telephone contact with the Defendant since, the date of separation however, the Defendant has not given his mailing address and the Plaintiff does not know where he currently resides.

5. That she has attempted to contact the relatives of Pierre Dickson in an attempt to find him and she has been unable to determine his address.

6. That Plaintiff has contacted a process server to serve the Defendant at his work address in Greenbelt, Maryland, in an attempt to serve the Defendant, without success as the Defendant works at a secure facility.

7. That Plaintiff has also sent the Complaint and the Writ of Summons to the Defendant at his work address via certified mail with a return receipt, however the Defendant did not sign for the documents.

8. That the Defendant has not changed his mailing address from the martial home, 3027 Wildflower Drive, La Plata, Maryland 20646 in which the Plaintiff resides, and she knows

of no other address for the Defendant.

9. That the Plaintiff has made all reasonable efforts to locate the Defendant, Pierre Dickson, and she does not know where he is or where she might make an attempt to serve him.

10. That there is no evidence that the Defendant is acting to avoid service. The Plaintiff simply does not know where he lives and cannot serve him where he works as it is a secure facility with limited access.

Wherefore, Plaintiff requests:

A. That this Court order service of process be made on Pierre Dickson by publishing notice at least once a week for three successive weeks in one or more newspapers of general circulation in Charles County, Maryland and by mailing a copy of the Complaint and Show Cause Order to the Defendant's work address.

B. That the Plaintiff may be granted such other and further relief as the nature of this cause may require.

Respectfully yours,

Andrews, Bongar, Gormley, & Clagett, P.A.



Cameron A. Methner  
11705 Berry Road, Suite 202  
Waldorf, Maryland 20603  
(301) 645-4100 or 843-1950  
Attorney for Plaintiff

IN THE CIRCUIT COURT FOR CHARLES COUNTY, MARYLAND

MARLYNN DICKSON

\*

Plaintiff

\*

vs.

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Case No: 08-C-12-001142

PIERRE D. DICKSON

\*

Defendant

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\* \* \* \* \*

**FILED**

JUN 04 2012

CIRCUIT COURT  
FOR CHARLES CO., MD.

AFFIDAVIT OF SERVICE OF PROCESS BY CERTIFIED MAIL

COMES NOW, Cameron A. Methner, pursuant to Maryland Rule 2-126(a) and states the following:

1. That a copy of the Writ of Summons and the Complaint for Absolute Divorce was mailed to Pierre D. Dickson, 8800 Greenbelt Rd. NASA TransPO, Mailstop #700, Bldg #25, S128, Greenbelt, MD 20771-2400, by certified mail, return receipt requested.
2. That the aforesaid copies were, in fact, received on May 29, 2012, as evidenced by the signature on the original return receipt which is attached hereto and incorporated herein.



Shannon Christian  
Andrews, Bongar, Gormley & Clagett, P.A.  
11705 Berry Rd., Suite 202  
Waldorf, MD 20603  
301-843-1950



# ANDREWS, BONGAR GORMLEY & CLAGETT, P.A.

*A Full Service Law Firm*

11705 Berry Road, Suite 202  
Waldorf, Maryland 20603  
301-645-4100 (Local)  
301-843-1950 (DC Metro)  
301-863-7480 (St. Mary's)  
301-843-2351 (Fax)  
Methner@SouthernMarylandLaw.com

TUCKER V. CLAGETT  
DAVID M. GORMLEY  
DAVID J. HEBB  
JESSICA S. B. ANDRITZ  
CAMERON A. METHNER  
YVES F. ARCHEY

GEORGE E. ANDREWS  
CHARLES A. BONGAR  
RICHARD B. STARKEY

**SouthernMarylandLaw.com**  
*Free, Useful, Legal Information*

June 1, 2012

Clerk  
Circuit Court for Charles County  
P.O Box 970  
La Plata, MD 20646

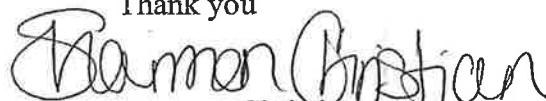
Re: Marylnn Dickson v. Pierre D. Dickson  
Case No. 08-C-12-001142

Dear Sir/Madam:

Enclosed is an original document(s) for filing with the Court. Please take the following action. If there are any questions or problems, please feel free to call me.

- File among the papers of the referenced matter.
- File and submit to the Judge for signature.
- File and have the Sheriff serve.
- File, issue a summons, and return a copy to this office for service.
- Enclosed is a copy of the pleading and a self addressed, stamped envelope. Please file stamp the copy and return it to this office in the self addressed, stamped envelope.
- Enclosed you will find a check in the amount of \$\_\_\_\_\_.

Thank you



Shannon Christian  
Paralegal to Cameron A. Methner

IN THE CIRCUIT COURT FOR CHARLES COUNTY, MARYLAND

MARLYNN DICKSON

\*

Plaintiff

\*

vs.

\*

Case No. 18-C-12-1142

PIERRE D. DICKSON

\*

Defendant

\*

\* \* \* \* \*

ORDER

UPON CONSIDERATION of the Plaintiff's Verified Motion for Alternative Service filed herein, and any response thereto, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2012, by the Circuit Court for Charles County, Maryland,

ORDERED, this Motion for Alternative Service be GRANTED; and it is further

ORDERED, that service on the Defendant, Pierre Dickson, in the above captioned proceeding may be effected by the Plaintiff publishing a notice at least once a week for three successive weeks in one or more newspapers of general circulation in Charles County, Maryland, and by mailing a copy of the Complaint and Show Cause Order to the Defendant's work address.

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JUDGE

IN THE CIRCUIT COURT FOR CHARLES COUNTY, MARYLAND

MARLYNN DICKSON

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Plaintiff

\*

vs.

\*

Case No. 18-C-12-1142

PIERRE D. DICKSON

\*

Defendant

\*

\* \* \* \* \*

NOTICE

The Plaintiff, MARLYNN DICKSON, has filed a Complaint for Absolute Divorce and in the Alternative a Complaint for Limited Divorce, Custody and Other Relief and Motion for Alternative Service in which she is seeking sole physical and legal custody of KHARI DICKSON, born February 9, 1995 to MARLYNN DICKSON and PIERRE DICKSON; and resides at 3027 Wildflower Drive, La Plata, Maryland 20646, she is also seeking an absolute divorce or in the alternative a limited divorce, alimony, child support, use and possession of family use personal property, a monetary award, and a contribution to her attorney's fees.

Notice is hereby issued by the Circuit Court for Charles County, Maryland, that the relief sought in the aforementioned Complaint may be granted, unless cause be shown to the contrary. Defendant is to file the response to the Complaint for Custody on or before \_\_\_\_\_, 2012. Failure to file the response within the time allowed may result in a judgment by default or granting the relief sought.

A copy of this notice shall be published one time in a newspaper of general circulation in the Charles County, once in each of three (3) successive weeks on or before \_\_\_\_\_, 2012.

\_\_\_\_\_  
CIRCUIT COURT CLERK

IN THE CIRCUIT COURT FOR CHARLES COUNTY, MARYLAND

MARLYNN DICKSON

\*

Plaintiff

\*

vs.

\*

Case No. 18-C-12-1142

PIERRE D. DICKSON

\*

Defendant

\*

\* \* \* \* \*

ORDER FOR PUBLICATION

This is to give notice that on this \_\_\_\_\_ day of \_\_\_\_\_, 2012, a Notice and Affidavit was filed in the Circuit Court for Charles County, Maryland. The Notice states that the Plaintiff has filed a Complaint for Absolute Divorce and in the Alternative a Complaint for Limited Divorce, Custody and Other Relief and Motion for Alternative Service in which she is seeking sole physical and legal custody of Khari Dickson, born February 9, 1995 to Marlynn Dickson and Pierre Dickson; and resides at 3027 Wildflower Drive, La Plata, Maryland 20646, she is also seeking an absolute divorce or in the alternative a limited divorce, alimony, child support, use and possession of family use personal property, a monetary award, and a contribution to her attorney's fees.

WHEREUPON, IT IS ORDERED, by the Circuit Court for Charles County, Maryland, this \_\_\_\_\_ day of \_\_\_\_\_, 2012 that notice be given by publication once a week for one week on or before the \_\_\_\_\_ day of \_\_\_\_\_, 2012, which shall warn all interested persons to file an affidavit in opposition to the relief requested on or before the \_\_\_\_\_ day of \_\_\_\_\_, 2012.

\_\_\_\_\_  
JUDGE

# ANDREWS, BONGAR GORMLEY & CLAGETT, P.A.

*A Full Service Law Firm*

11705 Berry Road, Suite 202  
Waldorf, Maryland 20603  
301-645-4100 (Local)  
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YVES F. ARCHY

GEORGE E. ANDREWS  
CHARLES A. BONGAR  
RICHARD B. STARKEY

**SouthernMarylandLaw.com**

*Free, Useful, Legal Information*

June 15, 2012

Clerk  
Circuit Court for Charles County  
P.O Box 970  
La Plata, MD 20646

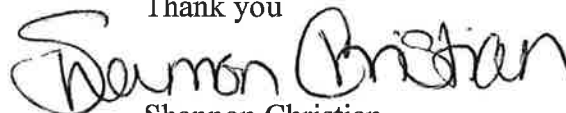
Re: Dickson v. Dickson

Dear Sir/Madam:


Enclosed is an original document(s) for filing with the Court. Please take the following action. If there are any questions or problems, please feel free to call me.

- File among the papers of the referenced matter.
- File and submit to the Judge for signature.
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Thank you



Shannon Christian  
Paralegal to Cameron A. Methner

 <b>U.S. Postal Service™</b> <b>CERTIFIED MAIL™ RECEIPT</b> (Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
Postage \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Sent Via <u>Certified</u> Recipient Name <u>Pierre D. Dickson / NASA</u> Street, Apt. No. or PO Box No. <u>8800 Greenbelt Rd</u> City, State, ZIP+4 <u>Greenbelt MD 20771-2400</u>	
PS Form 3800, August 2006 <span style="float: right;">See Reverse for Instructions</span>	

7010 2780 0002 0711 0150

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	A. Signature <input checked="" type="checkbox"/> 	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
1. Article Addressed to: <u>Pierre D. Dickson</u> <u>8800 Greenbelt Rd.</u> <u>NASA TransPO</u> <u>Mailstop #100 Bldg #25</u> <u>S128</u> <u>Greenbelt, MD 20771-2400</u>	B. Received by (Printed Name) <u>Anthony Rho</u>	C. Date of Delivery <u>5/29/12</u>
	D. Is delivery address different from item 1? If YES, enter delivery address below:	
2. Article Number (Transfer from service label)	7010 2780 0002 0711 0150	
3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
PS Form 3811, February 2004	Domestic Return Receipt	102595-02-M-1540

CIRCUIT COURT FOR CHARLES COUNTY  
COURTHOUSE  
P.O. BOX 970  
LA PLATA, MARYLAND 20646

CIVIL STATEMENT OF COSTS

DATE: 6-26-12

CASE NUMBER C12-1142  
INVOICE NUMBER \_\_\_\_\_

Dickson

vs.

Dickson

CIRCUIT COURT FOR CHARLES COUNTY  
Clerk of the Circuit Court,  
Sharon L. Hancock  
200 Charles Street  
P.O. Box 970  
La Plata, MD 20646  
Phone: (888)-932-2072

Received From: William Z Haskell  
Address: P O Box 1299  
14925 Pratt Street  
Upper Marlboro, MD  
20773

_____	1206 Overage
_____	1157 Clerk/TVD
_____	1203 Copy - Non Case
_____	1169 HCF Mediation Fund
_____	1208 Recording Fee
_____	1209 Ret. Check Fee
_____	1105 Dismissal Fee
_____	1107 Fiduciary Acct
_____	2000 Interest Bearing Account
_____	101 Circuit Court
_____	102 Bail Bond Acct.
_____	103 State Roads Acct

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TOTAL 16.00

Case #C-12-001142  
CF-App Fee \$10.00  
TOTAL \$16.00  
Receipt #201200004144  
Cashier: AJ COCHRAN  
06/26/12 3:34pm

DUPLICATE

08-C-12-001142 DA  
Marlynn Dickson vs Pierre D Dickson  
Clerk Fee - Appearance Fee CK 1437  
\$10.00  
Sub Total \$10.00

---NOPI-----AMOUNT---	
CK	\$10.00
-----	
TOTAL TENDERED	\$10.00
CASH RECEIVED	\$0.00
CASH DUE	\$0.00
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CHANGE	\$0.00

Receipt #201200004144  
Cashier: AJ COCHRAN  
06/26/12 3:34pm

William Haskell  
Cashier AJ Cochran Check  Cash