

^{13529/1921}
In the Ct. let. No. 2.
of Baltimore City

Margaret T. Dowell

→ vs ←

Edgar J. Dowell

Bill for Divorce

A. V. M

~~No 21023A~~

Mr. Clerk;

Please file

E. Jackson

Sol. for P.H.

no but

Ad. 23' Newark 11/1921

Margaret T. Dowell (

VS.)

Edgar J. Dowell (

In the

Circuit Court No. 2 of Baltimore City.

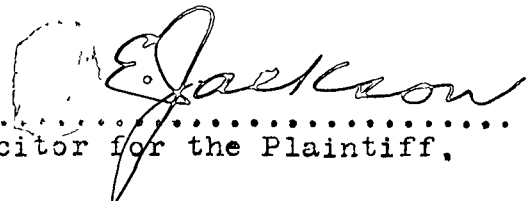
To the Honorable, the Judge of said Court:-

Your oratrix complaining respectfully says:-

1. That the parties hereto intermarried in Baltimore City, State of Maryland on or about the 4th day of February 1915, and lived together as man and wife till on or about the 1st day of April 1918, when the defendant without any just cause deserted and abandoned your oratrix and has declared his intention to live with her no more.
2. That the abandonment was deliberate is final, as continued uninterrupted for more than three years prior to the filing of this bill of complaint, and that there is no reasonable hope of a reconciliation.
3. That there are no children born as a result of said marriage.
4. That both parties are residents of the City and State aforesaid and have been for more than two years last past.
5. That the conduct of your oratrix has been above reproach in all respects-Having been a true and devoted wife to the said defendant, her husband.

Wherefore your oratrix prays A Divorce A Vinculo Matrimonii from the defendant and such other and further relief as the case may require.

May it please your Honor to grant unto your oratrix the Writ of Subpoena directed unto the said defendant, commanding him to be and appear in this Court on some day certain to be therein named and perform such decree as may be passed in the premises. And as in duty bound. &c.


.....
Solicitor for the Plaintiff.

73529/1921

In Circuit Court No 2
of

Baltimore City

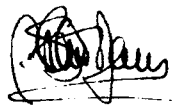
Margaret Howell

vs

E. Edgar Howell

Anna Howell for same

vs
Wm. Clark P. Coe file



2

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

Ed & Helen Howell

MARGARET T. DOWELL
VS
EDGAR J. DOWELL

IN THE CIRCUIT COURT NO. 2

&

OF

~~EDGAR J. DOWELL~~
VS
~~MARGARET T. DOWELL~~

BALTIMORE CITY.

.....

To the Honorable, The Judge of Said Court:

Your orator in answer to this bill of complaint is as follows:-

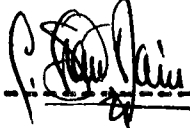
FIRST, Your orator admits the first paragraph of the plaintiff bill of complaint.

SECOND, Your orator denies the second paragraph of the plaintiff bill of complaint.

THIRD, Your respondent admits the third paragraph of the plaintiff bill of complaint.

FOURTH, Your respondent admits the fourth paragraph of the plaintiff bill of complaint.

FIFTH, Your respondent neither admits nor denies the plaintiff bill of complaint as contained in the fifth paragraph.



Circuit Court No. 2

529 B Docket 30
192

Margaret T. Dowell

vs.

Edgar J. Dowell

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

Mr. Clerk

Mr. Clerk
Please find
attached
No. 210 23 B.
3.

Filed 12 July, 1922

IN THE

Circuit Court No. 2,

OF

BALTIMORE CITY.

Margaret T. Dowell

vs.

Edgar J. Dowell

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

THE PETITION OF Margaret T. Dowell

Plaintiff

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

E. Jackson
Solicitor for Plaintiff

ORDERED, this 12th day of July 1922, 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.
Charles F. Brown

CIRCUIT COURT *Nov*

19

Docket No.

Margaret Howell
vs.

Edgar Howell

ORDER OF APPEARANCE

Mr. Clerk

Please File

(Signature)
Sol. for defendant

No.

Filed *day of* 19

Margaret Dowell

vs.

Edgar Dowell

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

Term, 19

~~Mr. WHITEFORD, Clerk.~~

Enter my appearance for Defendant

Solicitor

x N. EDGARDOWELL.

30 B.
J 24

Circuit Court

19

No. 2
Docket No.

Margaret Howell

vs.

Edgar Howell

SUBMISSION FOR DECREE.

Mr. Clerk,

Please file,

E. Jackson

Solicitor for Plaintiff.

No. 21023 B
5

Filed 17 August 1922

Margaret Howell

vs.

Edgar Howell

In the Circuit Court No 2
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.

E. Jackson

Solicitor for Plaintiff,

[Signature]

Solicitor for Defendant.

Ct. Ct. No. 2

529 B
192 Docket No. 30

George Howell
vs.

Edgar Howell

**Order of Reference
and Report**

Local

No. 21023 B
6

Order Filed 17 day of Aug 1922
Report Filed 15 day of Sept 1922

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

Margaret Howell

vs.

Edgar Howell

July Term, 192 *2*

This case being submitted, without argument, it is ordered by the Court, this *17*
day of *August*, 192 *2*, that the same be and it is hereby referred to
Ward B. Coe, Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.

E. Frank

Report of Auditor and Master

Bill for divorce a vinculo matrimonii filed by the wife against
her husband on the ground of abandonment. Code 1911 Art. 16 secs. 36-41.

Defendant appears and answers by solicitor ^{ity} ~~author~~ in writing.

Plaintiff's residence in Baltimore City for more than two years
proven.

The marriage proven.

The abandonment for three years, its finality and the irreconcil-
ability of the parties proven.

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

Case submitted and ready for decree.

Ward B. Coe

Auditor and Master.

August 19, 1922.

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

Ward B. Cox

Auditor and Master.

Circuit Court No. 2

-529-

B 1921. No. 30 Docket

MARGARET T. DOWELL

vs.

EDGAR J. DOWELL

DECREE OF DIVORCE

No. *21023 B*

8

Coyne & Leiper

R

Filed *2 October*, 192*2*

DECREE OF DIVORCE.

MARGARET T. DOWELL

vs.

EDGAR J. DOWELL

IN THE

Circuit Court No. 2

OF

BALTIMORE CITY.

September

TERM, 1922.

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

It is thereupon, this 2nd day of October, Anno

Domini, one thousand nine hundred and - twenty-two - - - - - by the CIRCUIT COURT No. 2

OF BALTIMORE CITY, Adjudged, Ordered and Decreed, that the said Margaret T. Dowell - - -

the above named complainant be, and she is hereby DIVORCED A VINCULO MATRIMONII, from the defendant, the said Edgar J. Dowell, also known as J. Edgar Dowell.

AND IT IS FURTHER ORDERED that said complainant be and she is hereby authorized to resume her maiden name, Margaret T. Henderson.

And it is further Ordered, that the said defendant pay the cost of this proceeding.

Handwritten signature

I, JOHN PLEASANTS, Clerk of the Circuit Court No. 2 of Baltimore City, do hereby certify that the above is a true copy of the decree taken from the record of proceedings in said cause.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of the said Court, this ___ day of ___ 192__

3/12/14/48

Docket B. 529/1921
IN THE CIRCUIT COURT No. 2

Margaret T. Dowell
vs

Edgar J. Dowell

DEPOSITIONS

No. 2102315

PLAINTIFF'S COSTS

Examiner.....	\$ 8.00
Copies	
Notices	
Sheriff	
Stenographer	2.00
	<u>\$ 10.00 Paid.</u>

DEFENDANT'S COSTS

Examiner.....	\$
Copies	
Notices	
Sheriff	
Stenographer	
	<u>\$</u>

ALFRED J. CARR, Examiner

Filed 14 day of August 1922
25 August 1922

Margaret T. Dowell

vs.

Edgar J. Dowell

In the Circuit Court No 2

OF BALTIMORE CITY

The above entitled 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, ALFRED J. CARR, one of the
Standing Examiners of the Circuit Court of Baltimore City, under and by virtue
of an order of the above named Circuit Court, passed in said cause on the
12th day of July 19 22, met on
the 12th day of July in the year nineteen
hundred and twenty two at my office, in the City of Baltimore, in the State
of Maryland, and assigned the 14th day of July
in the same year at twelve o'clock ~~xxxx~~ noon and the
office of the Examiner, 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 deposition, that
is to say:—

MARGARET T. DOWELL; the Plaintiff in this cause, produced as a witness on her own behalf, being first duly sworn, deposeth and saith as follows-that is to say-

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Margaret T. Dowell, 838 Vine Street. Manicurist.

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

A- Yes, I am Margaret T. Dowell, the Plaintiff, and the Defendant is my husband, Edgar J. Dowell.

BY MR. JACKSON:

3 Q- When were you married?

A- February 4th, 1915.

4 Q- Where and by whom?

A- At the parsonage of the Rev. James Briscoe, 735 George Street, in the City of Baltimore.

5 Q- Where did you and your husband live after the marriage?

A- We went house keeping 1600 Riggs Avenue.

6 Q- Were there any children born as a result of this marriage?

A- No.

7 Q- Are you and your husband now living together?

A- No.

8 Q- When did you separate and which one left the other?

A- April 1, 1918, he left me.

9 Q- Where were you living at that time?

Margaret T. Dowell.

A- We had moved to 838 Vine Street and lived with my mother.

10Q- What was your treatment and conduct towards your husband during the whole of your married life?

A- I was a true and faithful wife, loving and kind, and took good care of the home and looked after him.

11Q- How did he treat you?

A- He has never struck me but he has abused me in other ways. He has cursed me, and from time to time was constantly threatened that he was going to leave me. He made the household uncomfortable in every way.

12Q- You say that he abandoned you on the first of April 1918, what occurred that day?

A- He just went out and never came back. He didn't say he was going away to stay, he had his trunk packed and after he went away he sent for his trunk.

13Q- Since he abandoned you as you have described, without saying anything, and since he sent for his trunk after he had left on that day, have you lived with or cohabited with him?

A- No Sir, I have not.

14Q- Has he in any way directly or indirectly contributed to your support?

A- No Sir.

Margaret T. Dowell.

A- We had moved to 838 Vine Street and lived with my mother.

10Q- What was your treatment and conduct towards your husband during the whole of your married life?

A- I was a true and faithful wife, loving and kind, and took good care of the home and looked after him.

11Q- How did he treat you?

A- He has never struck me but he has abused me in other ways. He has cursed me, and from time to time was constantly threatened that he was going to leave me. He made the household uncomfortable in every way.

12Q- You say that he abandoned you on the first of April 1918, what occurred that day?

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13Q- Since he abandoned you as you have described, without saying anything, and since he sent for his trunk after he had left on that day, have you lived with or cohabited with him?

A- No Sir, I have not.

14Q- Has he in any way directly or indirectly contributed to your support?

A- No Sir.

Margaret T. Dowell.

15Q- Have you seen him?

A- I have seen him two or three times.

16Q- Did you have any talk with him?

A- Yes I talked with him.

17Q- What did he say, and what did you say?

A- I asked ~~him~~ why he left, but he never told me why he left, he always talked about something else, and wouldn't give me any satisfaction or any explanation, he simply would turn the subject to something else, or some other subject, he never would talk on it. I could get nothing out of him. He gave me no reason why he left, and he has never been back since.

18Q- On these various occasions do I understand you to testify that you made offers to have him return and live with you?

A- Yes, and not only have I talked with him, as I have told you and asked him to come back, I have written letters to him and requested him to return, he never answered the letters.

19Q- How long have you been a resident of the City of Baltimore State of Maryland prior to November 1921?

A- For the past eighteen years, and I have lived here ever since.

20Q- Has the abandonment of you by your husband been continuous and uninterrupted for more than three years prior to

Margaret T. Dowell.

the 23rd of November 1921?

A- Yes, it has, he left me on the first of April, 1918, and it was three years on the first of April, 1921, and it has continued ever since.

21Q- Was or not the abandonment his own final and deliberate act?

A- Yes, it was, he had no reason to leave me, I was a good true wife to him, and he has never attempted to explain or give any reason why he left me.

22Q- Do you know where your husband lives, and if so, with whom?

A- He has lived at a number of places, but just where he lives I do not know. He has been living with a woman the same as man and wife.

23Q- Is there any hope or reasonable expectation of a reconciliation?

A- No Sir. There is no hope.

24Q- If a decree is passed in this case do you or not request the Court to grant you permission to resume your maiden name?

A- Yes I do, I should like my name back, we have no children. I would like to have my name back.

25Q- What was your maiden name?

A- Margaret T. Henderson.

26Q- Is that your mother's name?

Margaret T. Dowell.

A^o No, my mother has been married twice, he name now is Johnson. I am a child by her first husband.

NOTE: NO CROSS EXAMINATION:

QUESTION BY THE EXAMINER:

Do you know or can you state any other matter or thing that may be of benefit or advantage to 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.

Answer:

No.

Margaret J. Dowell

MARGARET R. JOHNSON, a witness of lawful age, produced on behalf of the Plaintiff, being first duly sworn, deposeseth and saith as follows-that is to say-

BY THE EXAMINER:

1 Q- State your name, residence and occupation?

A- Margaret R. Johnson, 838 Vine Street. Domestic work.

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

A- Yes, the Plaintiff is my daughter and the Defendant is her husband, my son-in-law.

BY MR. JACKSON:

3 Q- Are they or not man and wife and if you say they are how do you know it?

A- They are man and wife, I know it because I was at the residence of the Rev. Mr. Briscoe, on George Street and saw them married. I witnessed the ceremony.

4 Q- After their marriage where did they go to live as man and wife?

A- They went to 1600 Riggs avenue, house keeping., and later on they moved from there to my home on Vine Street, and they lived with me as man and wife until my son-in-law abandoned his wife.

5 Q- Are they living together now?

A- No.

6 Q- When did they separate and which one left the other?

A- Mr. Dowell left my daughter, while they were living with me about April 1st, 1918.

Margaret R. Johnson.

7 Q- What occurred that day?

A- He came down stairs and told my daughter "I am going out and will be back shortly" he did not come back after that. I returned from my work, and my daughter told me that Edgar had all of his things packed up in his trunk, shortly after that a man came to the house, he said he had been sent by Mr. Dowell for his trunk, and he took the trunk away.

8 Q- Has or not your son-in-law ever returned to the house to live with his wife?

A- No.

9 Q- Has he ever been there on a visit?

A- No.

10Q- Has she ever, to your knowledge, received any communication from him?

A- Not that I know of.

11Q- Did you or not know of your daughter having made efforts to have him return?

A- I know she has sent him and asked him to return and I know she has sent him letters to come back, but he never answered any of the letters and never came.

12Q- Has or not your sister lived in Baltimore City for more than two years prior to her filing the Bill of Complaint in this case on the 23rd of November 1921?

A- Yes, she has lived here for the past eighteen years, she lives here now, and lives with me.

Margaret R. Johnson.

13Q- Do you know where Mr. Dowell lives?

A- No I do not.

14Q- What was your daughter's treatment and conduct towards her husband?

A- She was a good, kind wife to him, and did everything for him.

15Q- Has he or not in any way contributed to her support since he left her?

A- No.

16Q- How has she made a living?

A- She is a manicurist and works for herself.

17Q- How did Mr. Dowell treat his wife?

A- He was a quarrelsome complaining man, and always made trouble about the house, and every now and then he would say "I am going to leave and never come back".

18Q- What did he say when he left that day?

A- He said he was going and would be back, but he never came back.

19Q- Were there any children born as a result of this marriage?

A- No.

20Q- Are they living together now?

A- No.

21Q- Have you seen him or had any talk with him since he left?

A- No, I have not seen him.

Margaret R. Johnson.

22Q- What is his business?

A- He is a musician, and plays around at different places, mostly at Hotels in Baltimore, I have heard of his being in New York, but I don't know where he is now.

23Q- Has or not the abandonment of the Plaintiff by the Defendant, continued uninterruptedly for more than three years prior to the 23rd of November 1921?

A- Yes, over three years, he left her the first day of April 1918 and he has never come back or done anything for her and that's over three years.

24Q- What caused him to leave, if you know?

A- That I don't know. There never was any trouble, the only thing was that he said from time to time that he was going to leave.

25Q- Was the abandonment of your daughter by her husband his own deliberate and final act?

A- It certainly was, he left and wouldn't come back. I know he had no reason to leave my daughter she was a good, wife to him.

26Q- In your opinion is there any hope or reasonable expectation of a reconciliation?

A- None what ever.

27Q- What was your daughter's maiden name?

A- Henderson.

Margaret R. Johnson.

28Q- You have just testified that your name is Johnson, how do you explain that?

A- I was married twice, my first husband's name was Henderson, and Margaret is my daughter by my first husband. After that I married Mr. Johnson. I have never had any children by my second marriage.

Question by the Examiner:

Do you know or can you state any other matter or thing that may be of benefit or advantage to 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.

Answer: *That's all I know.*

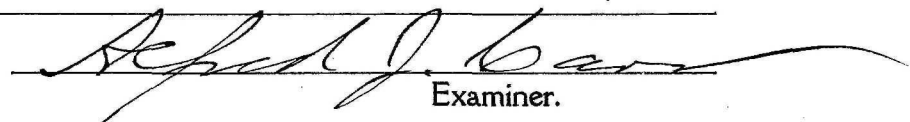
Margaret R. Johnson

No other witnesses being named or produced before me, I then at the request of the solicitor s of the respective parties closed the depositions taken in said cause, and now return them closed under my hand and seal on this 14th day of August in the year of our Lord nineteen hundred and twenty two at the City of Baltimore in the State of Maryland.

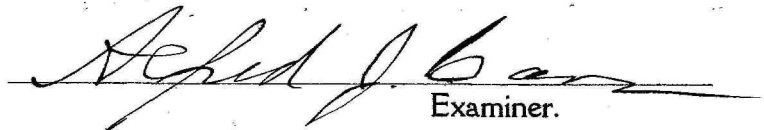

Examiner.

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

Defendant's Exhibit


Examiner.

I, ALFRED J. CARR, 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.


Examiner.