

In The Circuit Court
of
Baltimore City

Julius Guy Bowley

vs

Marie Jones
an infant

C Hampson Jones
Commissioner Health

Petition for Injunction

Wt Clerk please file
J Stewart Davis
attorney for plaintiff
a11179
(1)

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

Filed August 1921

Julius C. Bowley

In The Circuit Court

vs.

of

Mamie Joynes
(an infant)

Baltimore City.

&

C. Hampson Jones

To The Honorable, The Judge of Said Court.

FIRST, Your orator complaining respectfully says that on the 11th. day of April, 1920, the defendant gave birth to an illegitimate male child.

SECOND, That on the ^{18th} day of ^{June} 1920, before his Honor Judge Bond, sitting in the Criminal Court part one, without a jury, your orator was found not guilty of bastardy; said charge of bastardy having been entered by the defendant. The said defendant claiming that your orator was the father of the aforementioned male, illegitimate child born to the said defendant April 11th. 1920.

THIRD, That upon certifying the birth of the aforementioned illegitimate male child to the city Health department, per the regulations of said Department of Health; the said defendant gave the name of the aforementioned illegitimate male as "Julius Guy Bowley Jr": and that the records of the said department still so state that the name of the aforementioned illegitimate male child of the defendant is Julius Guy Bowley Jr.

FOURTH, That the defendant has conferred upon the aforementioned illegitimate male child, the name of Julius Guy Bowley Jr. and that the child is referred to by the defendant and others as Julius Guy Bowley Jr. and that the defendant continues to so refer to the aforementioned illegitimate male child as Julius Guy Bowley Jr..

FIFTH, That the defendant has publicly stated upon frequent occasions, which occasions were subsequent to your orator's acquittal of the aforementioned charge of bastardy. That your orator is the father of the aforementioned illegi-

timate male child.

SIXTH, That the defendant's surname is not Bowley and that she has never been so known as Bowley, but that her name surname is and always has been Joynes.

SEVENTH, That your orators name is Julius Guy Bowley.

EIGHTH, That your orator is not the father of the aforementioned illegitimate male child.

NINTH, That your orator is a practicing physician in the city of Baltimore, residing at 908 S. Sharp St; and that your orator is married, having a child of his own aged about twenty three months; that the successful practice of your orator's professional is dependant upon your orator's reputation for morality in the community; that the domestic tranquility of your orator's home is dependant also upon the consideration of your orators morals by the public.

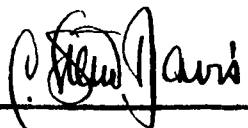
TENTH, Unless this Honorable Court *intervenes* to prevent the defendant from continuing to use the name of your orator in referring to the aforementioned illegitimate child, grave consequences of an extremely ruinious nature will result in so far as your orators present and future professional and personal reputations are concerned; and that if the defendant is not enjoined, at this time, from so referring to the aforementioned illegitimate child as Julius Guy Bowley Jr. your orator will be unable in the future to disprove the paternity of the aforementioned illegitimate child. That if the records of the City Health department are not changed so that the name of the aforementioned illegitimate child does not read "Julius Guy Bowley Jr" as it now reads, your orator will again be without redress to deny the inferred allegation of paternity as continued therein, *wherefore irreparable injury will be done the plaintiff*

Eleventh - That your orator has no adequate remedy at law and that a multiplicity of suits will result from the defendant's continuing to name aforesaid infant, "Bowley"

WHEREFORE YOUR ORATOR PRAYS:

A- That your Honorable Court direct a writ of injunction or a restraining order, ^{permanently} enjoining and restraining the defendant Mamie Joynes from conferring the name of "Julius Guy Bowley Jr." upon the illegitimate male child born to the defendnat April 11, 1920; and from publicity or otherwise stating that your orator is the father of the aforementioned illegitimate male child; ^{and from further using the name of "Bowley" as the surname of said child.} and that your honorable Court will issue an injunction, ordering the defendant C.Hampson Jones (Commissioner of Health for Baltimore City) from continuing ^{in the records of his department} the name of Julius Guy Bowley Jr." as the name of the aforementioned illegitimate male child and that your Honorable Court will further order the said defendant C.Hampson Jones (Commissioner of Health for Baltimore City) to change the name to read "JOYNE", which is the name of the defendant.

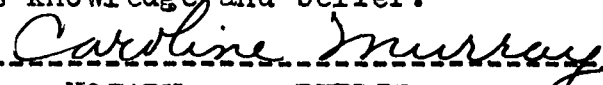
May it please your Honor to grant unto your orator a writ of subpoena directed unto the defendant Mamie Joyne and C.Hampson Jones (Commissioner of Health for Baltimore City) commanding them to be and appear in this Honorable Court on some day certain to be named therein, to answer such decree as may be passed therein.



attorney for plaintiff

State of Maryland)
) To Wit
Baltimore City.

I hereby certify that on this day of August 1921, before me the subscriber, a Notary Public in and for Baltimore City, State of Maryland, personally appeared Julius Guy Bowley, the complainant in the foregoing Bill and made oath in due form of law that the matter contained in the same was true to the best of his knowledge and belief.



NOTARY PUBLIC.

EQUITY SUBPOENA

The State of Maryland

*Blanche Jaynes
Mother*

SP #8 8-6-21

On *Mamie Jaynes,*

*in part.
#916 Leadenhall St.*

G. Hampson Jones, SP 8-6-21

Commissioner of Health &c.

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

Julius B. Bowley,

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 *11* day of *May* 192 *1*

Issued the *5* day of *August*, in the year 192 *1*

Chas R. Whiteford

Clerk.

MEMORANDUM: You are required to file your answer or other defense in the Clerk's Office, room 206, in the Court House, Baltimore City, within fifteen days after return day.

(General Equity Rules 11.)

u m
IN THE CIRCUIT COURT OF
BALTIMORE CITY. *#33*
1921

JULIUS C. BOWLEY

VS.

MAMIE JOYNES (an infant)

&

C. HAMPSON JONES.

DEMURRER

Mr. Clerk:

Please file,

211179
(3)

Rocand R. M. ...
City Solicitor, Attorney for Mayor
and City Council of Baltimore:

Filed August 1921

JULIUS C. BOWLEY

:

VS.

:

IN THE CIRCUIT COURT

MAMIE JOYNES
(an infant)

:

OF

:

BALTIMORE CITY.

&

:

C. HAMPSON JONES

:

C. Hampson Jones one of the respondents in the above entitled cause by Roland R. Marchant, Solicitor, demurs to the Bill of Complaint heretofore filed in this Honorable Court, exhibited for the following reasons:-

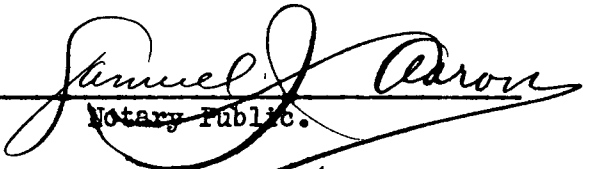
1. That the said Bill is without equity.
2. That the said Bill fails to set forth such a statement of facts as would entitle the above complainant to equitable relief against this respondent.
3. Because said Bill of Complaint is multifarious, in that it embraces different persons as defendants who have no privity with each other, and because said Bill contains several distinct matters which have no connection with each other.
4. Because of the mis-joinder of the parties.
5. And for such other and further reasons as may be assigned at the hearing of this demurrer.

And as in duty bound.


Attorney for C. Hampson Jones.

STATE OF MARYLAND,
TO WIT:
CITY OF BALTIMORE,

I HEREBY CERTIFY That on this 10th day of
August, nineteen hundred and twenty-one, before me, the subscriber,
a Notary Public in and for Baltimore City, State of Maryland,
personally appeared C. Hampson Jones and made oath in due form of
law that the foregoing demurrer is not filed for the purpose of
delaying the proceedings in the above entitled case.


Notary Public.

3/2/12/27

61a.433 A. 433
1921

IN THE CIRCUIT COURT
OF
BALTIMORE CITY.

Julius C. Bowley

vs

Mamie Joynes
(an infant)

and

C. Hampson Jones

DEMURRER.

A. 11179
(4)

Mr. Clerk,

Please file, etc.

Francis J. Plum
Solicitor for Respondent.

FILED 23 August 1921

J. Stewart Davis

86
A. 433
1921

Ct. Cl.
No. 617. Docket.

Julius G. Bowley

vs.

Marion Jones (amended)

C. Hampson Jones

MOTION FOR HEARING

W No. 11179
(5)

R. R. Marchant
Marion J. Blum

Filed 31st day of Aug 1921

Julius C. Bowley

vs.

Mame Jones (an infant)
C. Hampson Jones

IN THE
CIRCUIT COURT
OF
BALTIMORE CITY

The plaintiff

by J. Steeple Davis

his

Solicitor applies to have the above entitled cause placed on the Trial

Calendar for hearing on December

in conformity with the First Equity Rule.

(J. Steeple Davis)

Solicitor for

(C. Hampson Jones)

Serve on
R.R. Marchant
Maurice J. Blum

A-433

192 1

No.

Ct. Ct.

Docket

Julius C. Bowley

vs.

Mamie Joynes (an infant)

C. Hampson Jones

NOTICE OF HEARING

a No. 11179
267

No.

Filed 31st day of August 1921

Copies of the within Notice served on Roland R. Marchant
and Maurice J. Blum Solicitors on the 9th day
of September 1921 in presence of Harry B. Franz

Geo. H. 4/00

Thomas J. McNulty
Sheriff

JULIUS C. BOWLEY

VS

MAMIE JOYNES (AN INFANT)

C. HAMPSON JONES

IN THE

CIRCUIT COURT

OF BALTIMORE CITY

Upon application made by the Solicitor for the Plaintiff

*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* Demurrer

when reached in due course on said Calendar.

CHARLES R. WHITEFORD

Clerk Circuit Court