

IN THE CIRCUIT COURT *NO 2*
7.
BALTIMORE CITY. *B 379*
1925

WILLIAM H. BOWEN

VS.

LOTA E. BOWEN
103370. Stricker St.
"

BILL FOR DIVORCE.

Mr. Clerk:-

Please file.

Davis & Evans
ATTORNEYS FOR PLAINTIFF.

No 25476 B

DAVIS & EVANS,

ATTORNEY AT LAW
215 SAINT PAUL PLACE
BALTIMORE, MD.

Filed July 16th 1925

WILLIAM H. BOWEN

:

IN THE CIRCUIT COURT *No 2*

VS.

:

OF

LOTA E. BOWEN

:

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Orator complaining respectfully represents:

1. That he was married to his wife, Lota E. Bowen on the 10th day of January, 1921 and with whom he resided until the 11th day of July, 1922 when the defendant deserted the plaintiff.
2. That though the conduct of your Orator toward the said Lota E. Bowen has always been kind, affectionate and above reproach, she has, without any just cause or reason, abandoned and deserted him and has declared her intentions to live with him no longer, and that such abandonment has continued uninterruptedly for more than three years and is deliberate and final, and the separation of the parties is beyond any reasonable expectation of reconciliation.
3. That the said Lota E. Bowen has committed the crime of adultery with divers, lewd and abandoned men, whose names are unknown to your Orator and said offense has not been condoned by your Orator.
4. That your Orator has not lived or cohabited with the said defendant since said desertion and since he discovered her said adulteries.
5. That there is one child, Alvan J. Bowen, age four years, born as issue of said marriage and for whom the plaintiff asks the custody.

6. That both your Orator and the defendant are citizens of the State of Maryland, having resided in Baltimore City for more than three years prior to the filing of this Bill of Complaint.

TO THE END, THEREFORE:

(a) That your Orator may be divorced a Vinculo Matrimonii from the said Lota E. Bowen.

(b) That he may have the care and custody of the said infant, Alvan J. Bowen.

(b) That he may have such other and further relief as his case may require.

May it please your Honor to grant unto your Orator the Writ of Subpoena directed against the said Lota E. Bowen, commanding and requiring her to be and appear in this Court on some day certain to be named therein to answer the premises and abide by and perform such decree or order as may be passed therein.

And as in duty bound, etc.

Davis Evans

SOLICITORS FOR COMPLAINANT.

P-538

Ct. Ct. No. 2

379
1925

B

Docket No. 34

Powen

vs.

1033 Stricker

Powen

Subpoena to Answer Bill of Complaint

Pro

No. 25476B

2

Copy - copied

Filed 27th July, 1925

Lewis & Evans

Solicitor.

14

Summored and a copy of the process left
with the defendant John E. Datto
Shewiff

(Woylovsky)

7/18/25

Fees \$0.80

EQUITY SUBPOENA
The State of Maryland

To

Leta E Bowen
1033 W. Street St

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

William H Bowen

against you exhibited in the CIRCUIT COURT No. 2 OF BALTIMORE CITY.

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 *13th* day of *July*, 192*5*.

Issued the *16th* day of *July* in the year 192*5*.

John Pleasants

Clerk.

MEMORANDUM:

You are required to file your Answer or other defence in the Clerk's Office, Room No. 235, in the Court House, Baltimore City, within fifteen days after the return day. (General Equity Rule 11.)

13379/1925

IN THE
CIRCUIT COURT NO. 2
BALTIMORE CITY.

WILLIAM H. BOWEN

VS.

LOTA E. BOWEN

ANSWER
-to-
BILL OF COMPLAINT.

No 25476 B
3

Mr: Clerk:

Please file &c.,

Roy S. Bond
Sol. for Respondent.

ROY S. BOND
ATTORNEY AT LAW
220 ST. PAUL PLACE
BALTIMORE, MD.

FILED *6th August 1925*

THE DAILY RECORD COMPANY
Baltimore, Md.

WILLIAM H. BOWEN
VS.
LOTA E. BOWEN

IN THE
CIRCUIT COURT NO. 2
BALTIMORE CITY.

TO THE HONORABLE-THE JUDGE OF SAID COURT:

Your Respondent, Lota E. Bowen, in answer to Bill of Complaint heretofore filed against her, respectfully says:

- (1) That she admits that she was lawfully married to her husband, William H. Bowen, but denies that the date set out in his Bill of Complaint is correct. She denies that she deserted her husband on the 11th day of June, 1922, or any other date.
- (2) That she denies the allegations contained in paragraph TWO.
- (3) That she indignantly denies the allegations contained in paragraph THREE.
- (4) That she denies the allegations contained in paragraph and in answer to the same refers to her answer in paragraph TWO AND THREE.
- (5) That she admits that there is one child, Alvin J. Bowen, born as issue of said marriage, but denies that her husband is in anyway entitled to the custody of said child.
- (6) That she admits the allegations contained in paragraph SIX.

Having answered in so far as she is advised is necessary, she respectfully prays that the Bill of Complaint, heretofore filed be dismissed and that her husband, William H. Bowen, pay the costs of these proceedings.

As in duty bound, etc.,


Sol. for Respondent.

13379/1092

IN THE
CIRCUIT COURT NO. 2
BALTIMORE CITY.

WILLIAM H. BOWEN
578 St. Marys St
VS.

LOTA E. BOWEN

Petition
~~for~~
Alimony and Counsel fee.

No 25476B

Mr: Clerk:

Please file &c.,

Roy S. Bond
Sol. for Respondent.

ROY S. BOND
ATTORNEY AT LAW
220 ST. PAUL PLACE
BALTIMORE, MD.

FILED 6th August 1925

THE DAILY RECORD COMPANY
Baltimore, Md.

WILLIAM H. BOWEN

VS.

LOTA E. BOWEN

IN THE

CIRCUIT COURT NO. 2

BALTIMORE CITY.

TO THE HONORABLE-THE JUDGE OF SAID COURT:

Your Petitioner, Lota E. Bowen, respectfully says:

(1) That she alleges that her husband, William H. Bowen, has heretofore filed his Bill of Complaint, in this Honorable Court, asking for a divorce, A Vinculo Matrimonii, and that she has fully answered the same alleging therein that his charges are without foundation.

(2) That although she is innocent of said charges she has no money with which to employ Counsel or prove her innocence to this court. That although the child mentioned in these proceedings is in her custody, the said William H. Bowen, does not adequately support the said child.

(3) That her husband is employed as a Musician and earns not less than Thirty (\$30:00) Dollars, per week, for his services, and that she is informed that she entitled to have some part of his earnings with which to support her child and to employ Counsel to represent her in these proceedings.

WHEREFORE YOUR PETITIONER PRAYS

- a- Alimony, pendente lite for the support of herself and minor child~~ren~~
- b- Counsel fee in such sums as this Honorable Court may deem just and proper,
- c- Permanent alimony for the support of their minor child until it reaches a mature age,
- d- Such other and further relief as the case may require.

As in duty bound, etc.,

Lota E. Bowen.
Petitioner

Ray B. [Signature]
Sol. for Petitioner.

STATE OF MARYLAND

BALTIMORE CITY - to wit-

I HEREBY CERTIFY that on this 3rd
day of August, 1925, before me the subscriber,
a Notary Public, of the State of Maryland, in
and for Baltimore City, personally appeared
LOTA E BOWEN, petitioner and made oath in due
form of law, that the matters and facts set forth
in this her petition is true to the best of her
knowledge and belief.

AS WITNESS MY HAND AND NOTARIAL SEAL-

Clara S. Wright.
-NOTARY PUBLIC-

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Same as
William B Bowen
578 St Marys St

B Docket 379
1925

CIRCUIT COURT No. 2

Bowen

vs.

Bowen

Order Counsel Fee and Alimony
Pendente Lite
Husband Plaintiff

ORDER

No. 215476 B.

(5)

Copy - 6 paid

Filed 7th August 1925

Copy of the Order of Court served on
William B. Bowen on the 7th day of August, 1925
in the presence of August J. Bickel

Yes \$0.50

John E. Potee
Sheriff

IN THE

CIRCUIT COURT No. 2

William L Bowen

vs.

OF

BALTIMORE CITY

Leta E Bowen

July, TERM, 1925

ORDERED BY THE COURT, this *7th* day of *August* 1925

that the Plaintiff *William L Bowen*

pay to the Defendant *Leta E Bowen*

the sum of *Twenty - Five* Dollars as Counsel Fee for the

Solicitor of the Defendant, and that he further pay the sum of *Seven*

Dollars per week, during the continuance of this suit, to the said Defendant

as Alimony, pendente lite, unless cause to the contrary be shown on or before the *22nd*

day of *August* 1925, provided a copy of this Order be served on the said Plaintiff

William L Bowen on or before the *12th*

day of *August* 1925

W. H. Huntington

TRUE COPY—TEST:

*\$30 per week
1 child*

Clerk.

Circuit Court No. 2

379
1925

Docket B 34

William H. Bowen

vs.

Lota E. Bowen

Jay

Petition for Leave to Take
Testimony and Order of
Court Thereon.

No. 215476 B
6

Filed 18 August, 1925

William H. Bowen

vs.

Sota E Bowen

IN THE

Circuit Court No. 2,

OF

BALTIMORE CITY.

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

THE PETITION OF *William H. Bowen, Complainant,*

in this case, respectfully shows that *he* desires to take testimony in this case, and
respectfully prays that leave be granted to do so before one of the Standing
Examiners of this Court.

Davis Evans
Solicitor for petitioner

ORDERED, this *18th* day of *August 1925*, 19*25*, 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. Allen

Doc. B 379
1925

**In the Circuit Court, No. 2,
OF BALTIMORE CITY**

DEPOSITIONS

William H. Bowen

vs.
Leta E. Bowen

No. 25476 B

PLAINTIFF'S COSTS

Examiners.....\$.....
Copies.....
Sheriff.....
Stenographer.....
\$ _____

DEFENDANT'S COSTS

Examiners.....\$.....
Copies.....
Sheriff.....
Stenographer.....
\$ _____

14th October 1925
19th Oct 1925

3/19/21

William V. Bowen

vs.

Lata E. Bowen

In the Circuit Court No. 2,

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 eighteenth day of August, 1925, met on the twenty-second day of August in the year nineteen hundred and twenty-five at my office, in the city of Baltimore, in the State of Maryland, and assigned the twenty-fourth day of August in the same year at one-thirty 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:—

8-4.

WILLIAM H. BOWEN JR

VS.

LOTA E. BOWEN

Testimony taken before me, A. deRussy
Sappington, Examiner, at the offices of J. Stewart
Dvis, Baltimore, Maryland, on August 24, 1925 at
1.30 o'clock in the afternoon.

Thereupon---

WILLIAM H. BOWEN JR.,

the plaintiff, of lawful age, produced on his
own behalf, having been first duly sworn according
to law, was examined and testified as follows:

By the Examiner:

1Q Please state your name, residence and
occupation?

A William H. Bowen Jr., 578 St. Marys Street,
musician.

2Q Do you know the parties to this suit or
either of them?

A Yes, I am the plaintiff and my wife the
defendant.

By Mr. Evans:

1Q When, where and by whom were you married?

A January 10, 1921 in Baltimore City by Reverend R. W. S. Thomas.

2Q How long did you live with your wife?

A She left me July 11, 1922.

3Q Do you know why she left?

A We couldn't get along. She like to have her way about different things and she just got tired and didn't like the way I wanted her to do and she said she was going to better her condition and left.

4Q That was in July, 1922?

A Yes.

5Q Whatdid she say when she left?

A She said she was going to leave and get herself an apartment and would live with her Mother and Aunt.

6Q Did you give her any cause to leave you?

A No, sir.

7Q Did you always support her?

A Always.

8Q Were you always a kind, affectionate and

Wm H Bowen

4

faithful husband?

A Yes, sir.

9Q Did you support the child?

A I did.

10Q There is one child as result of your marriage?

A Yes, Alvin Jones Bowen, 5 years old.

11Q Have you been supporting it since the separation?

A Yes, since the separation.

12Q Are you willing to continue?

A I am.

13Q Who has the child?

A My wife.

13Q Do you think she is a fit and proper person to have the care and custody of the child?

A Yes, I think so.

14Q Do you think there is any hope of a reconciliation?

A No, sir.

15Q Have you lived or cohabited with her since July 11, 1922?

A No, sir.

16Q Are both parties residents of the City of

Wm H Bowen

5

Baltimore, State of Maryland, and have they been so for more than two years prior to the filing of this bill of complaint?

A Yes, sir.

17Q Has the separation continued uninterruptedly for more than three years prior to the same time?

A Yes, sir.

NOTE: Cross examination waived by
Mr. Bond.)

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

William H. Bowen Jr.

Thereupon---

BETTIE BOWEN,

a witness of lawful age, produced on behalf of the plaintiff, having been first duly sworn according to law, was examined and testified as follows:

By the Examiner:

1Q Please state your name, residence and occupation?

A Bettie Bowen, 578 St. Marys Street; housewife

2Q Do you know the parties to this suit or either of them?

A Yes.

By Mr. Evans:

1Q Do you remember when they were married and lived together as husband and wife?

A Yes, they were married in January 1921 in Baltimore by Rverend Thomas; I was at the wedding.

2Q Were they known and recognized in the community as husband and wife?

A Yes.

3Q Which left the other and when?

A She left him in July, 1922.

4Q Did he give her any cause?

A He did not.

5Q Was he always a kind, affectionate and faithful husband to her?

A Yes, sir, he was.

6Q Did you visit them often?

A Yes.

7Q Any children as result of their marriage?

A One, Alvin Jones Bowen, five years old.

8Q Who has the custody of the child?

A The Mother.

9Q Is she a fit person to care for it?

A I think so.

10Q Have you seen her since the separation?

A Yes, and talked to her.

11Q Did she talk as if she wanted to come back?

A No, sir, she said she would not come back;

I heard her say that myself.

12Q Do you think there is any hope of reconciliation?

A No, sir.

14Q Has he ever lived or cohabited with his wife since July 11, 1922?

A No, sir.

Bettie Bowen

9

15Q Are both parties residents of the City of Baltimore, State of Maryland and have they been for more than two years prior to the filing of this bill?

A Yes, all their lives.

NOTE: Cross examination waived by Mr.Bond.)

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

Bettie Bowers

Thereupon---

WILLIAM H. BOWEN SR.,

a witness of lawful age, produced on behalf of the plaintiff, having been first duly sworn according to law, was examined and testified as follows:

By the Examiner:

1Q Please state your name, residence and occupation?

A William H. Bowen Sr., 578 St. Marys Street, proter.

2Q Do you know the parties to this suit or either of them?

A Yes; he is my son.

By Mr. Evans:

1Q Do you remember when they were married and lived together as husband and wife?

A I do.

2Q Were they known and recognized by the community as husband and wife?

Aa Yes, sir.

3Q When did they separate and which left the other?

A She left him July 11, 1922.

4Q Where?

A At 1611 Druid Hill Avenue

5Q Was that where he maintained a home for her?

A Yes, sir.

6Q Did he give her any cause to leave?

A No, sir.

7Q Have you seen her since the desertion in 1922?

A Yes, I have seen her.

8Q Did she say whether or not she would return?

A No, sir.

9Q You went and got his things--

A Yes; she left him in the house and moved around on 1607 McCulloh Street.

10Q Has he lived or cohabited with her since July 1922?

A No, sir.

11Q Any children as result of their marriage?

A One.

12Q Is the name and age of the child properly given by the Father in his testimony?

A Yes.

13Q Who has the custody of the child?

A The Mother.

14 q Is she a fit and proper person to have the

custody of the child?

A Yes, I think so.

15Q Do you think there is any hope of reconciliation?

A No, sir.

16Q Are both parties residents of the City of Baltimore, State of Maryland, and have they been for more than two years prior to the filing of this bill?

A Yes.

17Q Has the separation continued uninterruptedly for more than three years prior to the same time?

A Yes.

18Q How did he always treat his wife; was he a kind, affectionate and faithful husband?

A Yes, he was.

19Q Did he support his wife?

A Yes, he did.

NOTE: Cross examination waived by Mr. Bond.)

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

Wm H. Bowen Esq.

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.....*7th* day of *October* in the year of Our Lord nineteen hundred and.....*Twenty-five*.....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.....*now*.....by the Defendant.....

A. de Russey Sappington
Examiner.

B379/1925
In the Circuit
Court no 2
Baltimore, MD

William H. Bowen
vs
Lola E. Bowen

Agreement as
to custody of child
& support thereof
No 25476 B.
8

By 15th October 1925

IN THE CIRCUIT COURT NO. 2
BALTIMORE CITY.

WILLIAM H. BOWEN

VS.

LOTA E. BOWEN

-AGREEMENT AS TO CUSTODY AND MAINTENANCE OF MINOR CHILD-

It is agreed by and between the parties of the above entitled cause, that in the event that a decree of divorce, A Vinculo Matrimonii, be passed in said cause, the permanent care, custody and guardianship of Alvan J. Bowen, the infant child of the parties to this cause be awarded to the Mother, Lota E. Bowen, with whom it has always been, and that the father, William H. Bowen, shall contribute Five(\$5:00) Dollars, per week for the support and maintenance of the said minor child pending the further Order of the Court.

It is expressly agreed that this agreement is made subject to the approval of this Honorable Court.

Lota E. Bowen.

MOTHER

Daw

Wm H Bowen
FATHER

Davis Evans
Sols. for Complainant

Raymond
Sol. for Respondent.

379
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Circuit Court # 2

Docket 834

William Bowen

Leta Bowen vs.

SUBMISSION FOR DECREE.

Mr. Clerk,
Please file,

Wais & Evans
Solicitors for Plaintiff.

No. 25476 B
9

Filed 15 October 1925

William E. Borne

Lota Borne

*In the Circuit Court #2
of Baltimore City*

Sept TERM 1925

To the Honorable

Judge of Said Court:

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

David Lewis

Solicitor for Plaintiff,

[Signature]

Solicitor for Defendant.

Ct. Ct. No. 2

379
1925

Docket No. B 34

Wm H Bowen

vs.

Lota E. Bowen

Order of Reference
and Report

Lynn

No. 715476 B.
101-11

Order Filed 16th day of Oct 1925

Report Filed 27th day of Oct 1925

William A Bowen

vs.

Sata E. Bowen

IN THE
Circuit Court No. 2
OF
BALTIMORE CITY

Sept Term, 1935

16th

This case being submitted, without argument, it is ordered by the Court, this
day of October, 1925, that the same be and is hereby referred to
W^m P Lyons, Esq., Auditor and Master, to report the
pleadings and the facts, and his opinion thereon.

James P. Gorter

Report of Auditor and Master

Bill for divorce a vinculo matrimonii filed by the husband against
his wife on the ground of abandonment. Code Art. 16, Sec. 37-42.

Defendant summoned and answered.

Plaintiff's residence in Baltimore City for more than two years
prior to the filing of the bill proven.

The marriage proven.

Abandonment uninterruptedly for three years, its finality and the
irreconcilability of the parties proven.

Case made for awarding the guardianship and custody of the minor
child of the parties to the defendant, and charging the plaintiff with
the maintenance and support of said child, in accordance with the agree-
ment filed in this case.

Case submitted for decree and 43rd General Equity Rule waived.

Case ready for decree.

William P. Lyons

Auditor and Master

October 22, 1925

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

William P. Lyons
Auditor and Master

Circuit Court No. 2

B ³⁷⁹ 1925 No. Docket

WILLIAM H. BOWEN

vs.

LOTA E. BOWEN

DECREE OF DIVORCE

ode R
No. *25476 B*
12
Copy 2 copied

Filed *28th October*, 192*5*

DECREE OF DIVORCE.

IN THE

WILLIAM H. BOWEN

vs.

LOTA E. BOWEN

Circuit Court No. 2,

OF

BALTIMORE CITY

September Term, 1925

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

It is thereupon, this *twenty eighth* day of *October*, - - - - - Anno Domini, one thousand nine hundred and *twenty-five*, - - - - - by the CIRCUIT COURT No. 2 OF BALTIMORE CITY, Adjudged, Ordered and Decreed, that the said WILLIAM H. BOWEN,

the above named complainant be, and he is hereby DIVORCED A VINCULO MATRIMONII, from the defendant, LOTA E. BOWEN;

AND it is further ordered that the guardianship and custody of Alvin J. Bowen, minor child of the parties, be and the same are hereby awarded to the defendant, Lota E. Bowen; and the complainant, William H. Bowen, is hereby charged with the maintenance and support of said child, and shall pay to the defendant, towards said maintenance and support, the sum of five dollars per week - all subject to the further order of this Court.

And it is further Ordered, that the said Complainant, William H. Bowen, pay the cost of this proceeding.

Robert J. Stauber

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 _____ 1925

Served on
Lota E. Bowen
1713 W. Lafayette
1312 Reggs Ave

JAN 16 1930 9 57 AM

RECEIVED AT
THE SHERIFFS OFFICE ON

DEC 23 1929 9 12

RECEIVED AT
THE SHERIFFS OFFICE

348/379/925

IN THE
CIRCUIT COURT, NO. 2
OF
BALTIMORE CITY

WILLIAM H. BOWEN

VS

1/23/30 - (14)

LOTA E. BOWEN

1312 Reggs Ave

P E T I T I O N

Mr. Clerk: Copy made

Please file.

copy - L. E. Bowen
copy - L. E. Bowen
copy - L. E. Bowen
No 25446B

Attorney for Petitioner

(13) (15)

JOSIAH F. HENRY, JR.
ATTORNEY AT LAW
8 E. LEXINGTON STREET
BALTIMORE, MD.

FILED 20 - December 1929

THE DAILY RECORD CO., BALTIMORE, MD.

Wm Est
(Keene)
Wm Est.
(Keene)
Non Est
Keene

John E. Pater
Sheriff
John E. Pater
Sheriff
John E. Pater
Sheriff

Copy of the within Petition and Order of Court
Served on Lota E. Bowen on the 23rd day of January
1930 in Presence of Thomas J. Riggin

John E. Pater
Sheriff
Jes J. Pater
Sheriff

WILLIAM H. BOWEN

VS
LOTA E. BOWEN

1/23/30 - (14)

IN THE
CIRCUIT COURT, NO. 2
OF
BALTIMORE CITY

TO THE HONORABLE JUDGE OF SAID COURT.

Your petitioner, William H. Bowen, respectfully represents to your Honor that he is the divorced husband of Lota E. Bowen. That the Decree of Divorce may be found in the above mentioned Court, 34B - Folio 379.

That during the said union there was born to them one child, Alvan J. Bowen, who per agreement between the parties, William H. Bowen and Lota E. Bowen, the permanent care, custody, maintenance and guardianship of the infant was given the mother who has since the Decree of Divorce continuously had the custody of the said child.

That Lota E. Bowen, the mother of Alvan J. Bowen, has since married and now lives with her husband in the city of Baltimore.

That William H. Bowen, your petitioner, voluntarily agreed and by order of this Court (October 28, 1925) to pay Five Dollars (\$5.00) a week for the maintenance of said minor child and that he has since or about August 6, 1925 punctually and regularly paid the aforesaid sum without having missed a single week and without having received a single letter from the Probation Department by way of reprimand.

That the petitioner is engaged as a musician and earning Eighteen Dollars (\$18.00) per week.

That he now has the care and maintenance of an aged mother in addition to the expense necessary for his own existence and that from the Eighteen Dollars (\$18.00) he must

support his mother, himself, pay life insurance for both, cloth both and contribute toward the support of his child.

That at the time of the signing of the Decree of Divorce your petitioner was earning Thirty-five Dollars (\$35.00) per week, exclusive of tips and was then working regularly. Your petitioner's work is now very irregular.

Your petitioner respectfully prays this Honorable Court to reduce the said sum of Five Dollars (\$5.00) per week to that of Three Dollars (\$3.00) for the reasons above set forth and such other and further relief as his case may require.

As in duty bound, etc.

William F. Bowen

PETITIONER.

Joseph M. Henry, Jr.
ATTORNEY FOR PETITIONER.

STATE OF MARYLAND, CITY OF BALTIMORE, to wit:

I HEREBY CERTIFY, that on this 17th day of December, in the year one thousand nine hundred and twenty-nine, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City aforesaid, personally appeared the within named petitioner and acknowledged the foregoing petition to be his act.

Francis Henry
NOTARY - PUBLIC.

O R D E R

Ordered by the Circuit Court, No. 2 of Baltimore
 City ^{this 20. day of December 1929} in the above matter that the said sum of Five Dollars
 (\$5.00) support for the infant Alvan J. Bowen be and is here-
 by reduced to Three Dollars (\$3.00) per week. Provided that
 a copy of this petition be served on Lota E. Bowen residing ^{on or before 27. December 1929}
 in Baltimore City and unless cause to the contrary be shown
 on or before 6-January, 1930.

Critchman
 J U D G E .

The foregoing Order having been returned "Non Est" as appears by the
 Sheriff's return thereon; it is Ordered by the Circuit Court No. 2 of Baltimore City
 this 4- day of January 1930, that the time for showing cause
 under said Order be extended to the 20- day of January 1930,
 and the time for service of a copy of the same be extended to the 10- day of
January 1930.

✓ *Critchman*

The foregoing Order having been returned "Non Est" as appears by the
 Sheriff's return thereon; it is Ordered by the Circuit Court No. 2 of Baltimore City
 this 16- day of January 1930, that the time for showing cause
 under said Order be extended to the 31- day of January 1930,
 and the time for service of a copy of the same be extended to the 21- day of
January 1930.

George A. Sachs

The foregoing Order having been returned "Non Est" as appears by the
 Sheriff's return thereon; it is Ordered by the Circuit Court No. 2 of Baltimore City
 this 22- day of January 1930, that the time for showing cause
 under said Order be extended to the 6- day of February 1930,
 and the time for service of a copy of the same be extended to the 27- day of
January 1930.

George A. Sachs

Substant

WILLIAM H. BOWEN

VS

LOTA E. BOWEN

IN THE

CIRCUIT COURT, 2.

OF

BALTIMORE CITY

TO THE HONORABLE JUDGE OF SAID COURT-

Your petitioner, William H. Bowen, respectfully represents to your Honor that he is the divorced husband of Lota E. Bowen. That the Decree of Divorce may be found in the above mentioned Court, 34B - Folio 379.

That during the said union there was born to them one child, Alvan J. Bowen, who per agreement between the parties, William H. Bowen and Lota E. Bowen, the permanent care, custody, maintenance and guardianship of the infant was given the mother who has since the Decree of Divorce continuously had the custody of the said child.

That Lota E. Bowen, the mother of Alvan J. Bowen, has since married and now lives with her husband in the city of Baltimore.

That William H. Bowen, your petitioner, voluntarily agreed and by order of this Court (October 28, 1925) to pay Five Dollars (\$5.00) a week for the maintenance of said minor child and that he has since or about August 6, 1925 punctually and regularly paid the aforesaid sum without having missed a single week and without having received a single letter from the Probation Department by way of reprimand.

That the petitioner is engaged as a musician and earning Eighteen Dollars (\$18.00) per week.

That he now has the care and maintenance of an aged mother in addition to the expense necessary for his own existence and that from the Eighteen Dollars (\$18.00) he must support

his mother, himself, pay life insurance for both, cloth both and contribute toward the support of his child.

That at the time of the signing of the Decree of Divorce your petitioner was earning Thirty-five Dollars (\$35.00) per week, exclusive of tips and was then working regularly. Your petitioner's work is now very irregular.

Your petitioner respectfully prays this Honorable Court to reduce the said sum of Five Dollars (\$5.00) per week to that of Three Dollars (\$3.00) for the reasons above set forth and such other and further relief as his case may require,

As in duty bound, etc.

Wm H Bowen
PETITIONER.

Francis H. Henry, Jr.
ATTORNEY FOR PETITIONER.

STATE OF MARYLAND, City of Baltimore, to wit-

I HEREBY CERTIFY, that on this 16th day of in the year one thousand nine hundred and thirty, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City aforesaid, Personally appeared the within named petitioner and acknowledged the foregoing petition to be his act.

Francis H. Henry
NOTARY - PUBLIC

B379/1925

IN THE CIRCUIT COURT NO. 2
OF BALTIMORE CITY.

WILLIAM H. BOWEN

VS.

LOTA E. BOWEN

ANSWER TO PETITION.

Mr. Clerk:

Please file &c.

No 25476 B.

<16>

Roy S. Bond

Solicitor for Respondent

ROY S. BOND
ATTORNEY AT LAW
14 EAST PLEASANT ST.
BALTIMORE, MD.

FILED 6 - February 1930

WILLIAM H. BOWEN

IN THE CIRCUIT COURT NO. 2

VS.

OF

LOTA E. BOWEN

BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT:

Your Respondent, Lota E. Bowen, in answer to the Petition for the reduction of alimony, respectfully says:

First: That she admits the allegations contained in paragraph number one.

Second: That she admits the allegations contained in paragraph number two.

Third: That she admits the allegations contained in paragraph number three.

Fourth: That she emphatically denies the allegations contained in paragraph number four and demands strict proof thereof.

Fifth: That she emphatically denies the allegations contained in paragraph number five and demands strict proof thereof.

Sixth: That she emphatically denies the allegations contained in paragraph number six and demands strict proof thereof.

Seventh: That she emphatically denies the allegations contained in paragraph seven and demands strict proof thereof.

^{answered} Having in and as far as she is advised to in the Petition for the Reduction of Alimony from the sum of five dollars per week to three dollars per week she prays that the same be dis-allowed and the same be dismissed with her proper costs.

As in duty bound, etc.

Lota E. Bowen

Respondent

R. M. Bond

Solicitor for Respondent

STATE OF MARYLAND, CITY OF BALTIMORE, to wit:

I HEREBY CERTIFY that on this fourth day of February, in the year one thousand nine hundred and thirty, before me, the subscriber, a Notary Public of the State of Maryland, in and for Baltimore City, aforesaid, personally appeared, Lota E. Bowen, Respondent, in the foregoing Petition, and she made oath in due form of law that the matter and facts set forth in this her answer are true to the best of her knowledge and belief.

AS WITNESS my hand and Notarial Seal.



Linwood Hazlett
.....
Notary Public.

Jonah F. Henry Jr

119

41

Circuit Court No. 2

379
1925 B. DOCKET No. 34

William H. Bowen

vs.

John E. Bowen

Motion for Hearing

No. 25476B.
4177

Filed 29 day of May 1930

Roy S. Bond

William H. Bowen

vs.

Yato E. Bowen

IN THE
Circuit Court No. 2

-OF-
BALTIMORE CITY

The petitioner by _____

Frank M. Henry Jr. Solicitor, applies to have the above entitled cause placed in the
Trial Calendar for hearing on Friday petitioner and

answer

In conformity with the First Equity Rule.

Frank M. Henry Jr.
Solicitor for petitioner

SERVE ON

*Roy S. Bond
Sol*

119

41

Circuit Court No. 2

349
1925

B

DOCKET No. *34*

Bowen

vs.

Bowen

NOTICE AS TO HEARING

No. *25476B.*
4187

Copy - Encl

Filed *29 - May - 1925*

10

*Copy of the within notice served on Roy S. Bond,
Solicitor on the 2nd day of June, 1925, in the
presence of August J. Kirby John E. Follee
Jae 10-75
Jenif*

William H. Bowen
vs.
Lota E. Bowen

IN THE
Circuit Court No. 2
—OF—
BALTIMORE CITY

Upon application made by the Solicitor for the

Petitioner

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

Petition and answer

when reached in due course on the said calendar.

JOHN PLEASANTS,

Clerk Circuit Court No. 2.

IN THE
CIRCUIT COURT NO. 2
OF
BALTIMORE CITY

WILLIAM H. BOWEN

VS

LOTA B. BOWEN

PETITION

MR. CLERK-

Please file.

Josiah H. Henry, Jr.
ATTORNEY FOR PETITIONER
No 25476 B
1930

JOSIAH H. HENRY, JR.
ATTORNEY AT LAW
8 E. LEXINGTON STREET
BALTIMORE, MD.

FILED

16 - June 1930

WILLIAM H. BOWEN

VS

LOTA E. BOWEN

IN THE
CIRCUIT COURT, 2.
OF
BALTIMORE CITY

TO THE HONORABLE JUDGE OF SAID COURT-

Your petitioner, William H. Bowen, respectfully represents to your Honor that he is the divorced husband of Lota E. Bowen. That the Decree of Divorce may be found in the above mentioned Court, 34B - Folio 379.

That during the said union there was born to them one child, Alvan J. Bowen, who per agreement between the parties, William H. Bowen and Lota E. Bowen, the permanent care, custody, maintenance and guardianship of the infant was given the mother who has since the Decree of Divorce continuously had the custody of the said child.

That Lota E. Bowen, the mother of Alvan J. Bowen, has since married and now lives with her husband in the city of Baltimore.

That William H. Bowen, your petitioner, voluntarily agreed and by order of this Court (October 28, 1925) to pay Five Dollars (\$5.00) a week for the maintenance of said minor child and that he has since or about August 6, 1925 punctually and regularly paid the aforesaid sum without having missed a single week and without having received a single letter from the Probation Department by way of reprimand.

That the petitioner is engaged as a musician and earning Eighteen Dollars (\$18.00) per week.

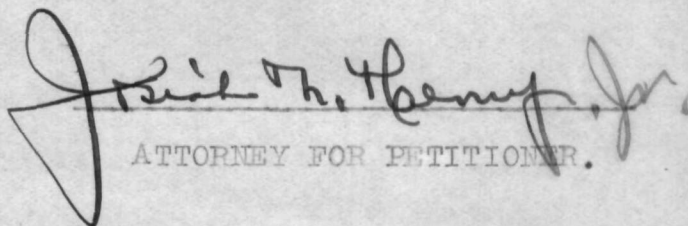
That he now has the care and maintenance of an aged mother in addition to the expense necessary for his own existence and that from the Eighteen Dollars (\$18.00) he must support

his mother, himself, pay life insurance for both, cloth both and contribute toward the support of his child.

That at the time of the signing of the Decree of Divorce your petitioner was earning Thirty-five Dollars (\$35.00) per week, exclusive of tips and was then working regularly. Your petitioner's work is now very irregular.

Your petitioner respectfully prays this Honorable Court to reduce the said sum of Five Dollars (\$5.00) per week to that of Three Dollars (\$3.00) for the reasons above set forth and such other and further relief as his case may require,

As in duty bound, etc.

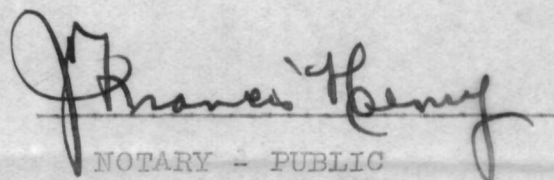

ATTORNEY FOR PETITIONER.



PETITIONER.

STATE OF MARYLAND, City of Baltimore, to wit-

I HEREBY CERTIFY, that on this 16th day of ~~April~~ in the year one thousand nine hundred and thirty, before me, the subscriber, a Notary Public of the State of Maryland, in and for the City aforesaid, Personally appeared the within named petitioner and acknowledged the foregoing petition to be his act.


NOTARY - PUBLIC

ORDER

Ordered by the Circuit Court, No. 2 of Baltimore City in the above matter that the said sum of Five Dollars (\$5.00) support for the infant Alvan J. Bowen be and is hereby reduced to Three Dollars (\$3.00) per week.

JUDGE.

Probation Officer.

Copy of the above decree sent by the Court to Mr. [redacted]

1930.

Modified decree signed this 16th day of June
reduced amount of \$3.00.
home, she having elected to keep it in present custody at the
to the father, who is willing and able to support it at his
ceiving \$3.00 a week for its support or letting the same be
having been given alternative of retaining the child and re-
per week, deduction accounting from this date; divorced wife
the support of child and reduced from \$2.00 per week to \$3.00
Sept, 1925, is hereby modified as to the amount payable for
being represented by counsel in the Order of Court dated October

Bowan
v.
Bowan

Hearing had, testimony taken, both parties

Modified Decree

*No 25416
720*

*** ** ***

Dec. 9 1925

D. SPENCER

TOTY E. BOWEN

BALTIMORE CITY

AS.

WILLIAM H. BOWEN

IN THE CIRCUIT COURT NO. 3

Ed 16 - June 1930

WILLIAM H. BOWEN

*

IN THE CIRCUIT COURT NO. 2

vs.

*

OF

LOTA E. BOWEN.

*

BALTIMORE CITY

Doc. B 379

B.25476-B.

*** * * ***

1925

MODIFIED DECREE

Hearing had, testimony taken, both parties being represented by counsel, the Order of Court dated October 28th, 1925, is hereby modified as to the amount payable for the support of child and reduced from \$5.00 per week to \$3.00 per week, ^{re} deduction accounting from this date; divorced wife having been given alternative of retaining the child and receiving \$3.00 a week for its support or letting the same go to the father, who is willing and able to support it at his home, she having elected to keep it in present custody at the reduced amount of \$3.00.

Modified decree signed this 16th day of June, 1930.

..... *Eugene O. Durney* J.

Copy of the above decree sent by the Court to Mr. Stuckert, Chief Probation Officer.