

(3851)

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

MARY NELL BOWEN, Complainant

vs.

HERMAN BOWEN, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on service by Registered mail and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and that the said MARY NELL BOWEN is forever divorced from the said HERMAN BOWEN

It is further ORDERED, ADJUDGED AND DECREED that the respondent, Herman Bowen, pay over to the Complainant the sum of twenty dollars a week, beginning immedietly, for the support and maintenance of herself and minor child and the care, control and custody of the minor child of the marriage is is hereby awarded to the Complainant, the Mother of said child.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon payment of the cost of this suit.

It is further ordered that Mary Nell Bowen the complainant pay the cost herein to be taxed, for which executed may issue.

This 16 day of October 19 56

[Handwritten signature]

Judge Circuit Court, In Equity.

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree, rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the day of October, 19 56

Register of Circuit Court, In Equity.

No. \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

**DIVORCE DECREE**

FILED  
OCT 17 1956

WILLIAM L. SMITH, CLERK

MARY NELL BOWEN )  
COMPLAINANT )  
VS. )  
HERMAN BOWEN )  
RESPONDENT )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Your complainant Mary Nell Bowen, respectfully represents and shows unto Your Honor:

1. That the complainant is over the age of twenty years and is a resident of said State and County, and has been a bona fide resident for more than one year next preceding the filing of this bill of complaint; that Herman Bowen is over the age of twenty-one years and whose residence is unknown but whose present address is Route, Box 187, ~~Laurel~~ Lugoff, South Carolina.

2. That your complainant and respondent were lawfully married on or about, to-wit: February 6, 1952, in Brewton, Alabama, and of this marriage is one minor child, Glenda Lee Bowen, born December 20, 1953, dependant upon the respondent.

3. Your complainant avers and charges that the said respondent did on or about the 14th day of July, 1956, and many times subsequent thereto assault, beat, hit and strike complainant; that said respondent has committed actual violence on her person attended with danger to her health or life; complainant avers and charges that respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

4. Complainant avers that said respondent is employed and making about \$50.00 a week; that the complainant owns no property and has no means of support for herself and minor child; and that said respondent has refused and failed to provide for the support and maintenance of the complainant and said minor child; your complainant further avers that she is without means to pay her solicitor of record for his services rendered and to be rendered in this suit.

The premises considered, your complainant prays that your Honor will order service to be had according to law upon said respondent, commanding him to appear and plead, answer or demur to this bill of complaint within the time required by law and that your Honor will hold a hearing and award the Complainant temporary care, control and custody of the said minor child, pending this suit, and that your Honor will order the Register of this Court to hold a reference and report to this court what would be a reasonable amount to be allowed your complainant as alimony for her support and maintenance and the support and maintenance of the said minor child, pending this suit, and what would be a reasonable amount to be allowed your complainant's solicitor for his services rendered and to be rendered in this suit, and that upon a final hearing of this cause, that your Honor will render a decree divorcing your complainant from the respondent, granting the complainant permanent care, control and custody of the said minor child, permanent alimony for her support and maintenance and support and maintenance for said minor child, and your complainant prays for such other, further or general relief to which she may be entitled.

*Arthur C. Johnson*  
SOLICITOR FOR COMPLAINANT

no. 3851

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

MARY NELL BOWEN  
COMPLAINANT

VS.

HERMAN BOWEN  
RESPONDENT

BILL OF COMPLAINT

FILED

AUG 15 1956

ALICE J. BECK, Register

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALA.

The State of Alabama,  
Baldwin County.

No. .... CIRCUIT COURT, IN EQUITY.

MARY Nell Bowen

Complainant

Vs.

HERman Bowen

Defendant

Motion is hereby made for a Decree Pro Confesso against .....

..... Herman Bowen .....

..... Defendant .....

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant....., and that said summons was duly served by Registered Mail, according to law, and that said Defendant.....ha..... failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 28th day of September, 19 56

A. Epperson

....., Solicitor.

No. ....

Page .....

**THE STATE OF ALABAMA**  
**Baldwin County**

**CIRCUIT COURT, IN EQUITY**

.....  
MARY NELL BOWEN

.....  
**Vs.**

.....  
HERMAN BOWEN

**MOTION FOR DECREE PRO CONFESSO**  
**AFTER NOTICE BY REGISTERED MAIL**

Filed 9-28 ....., 1956.

Richard J. Blum  
Register.

Recorded in ..... Record,

Vol. .... Page .....

.....  
Register.

MARY NELL BOWEN

---

Vs.

HERMAN BOWEN

---



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**CIRCUIT COURT OF  
Baldwin County.**

---

IN EQUITY

In this cause it being made to appear to the Register that on the 15th.  
day of August, 19 56, a copy of the Bill of Complaint filed in this cause was  
sent to HERMAN BOWEN

Defendant, by registered mail, postage prepaid, marked "For delivery only to the person to whom  
addressed," and return receipt demanded addressed to the Register of this Court; and that on the  
18th. day of August, 19 56, such receipt was duly  
received and filed in this cause:

And it further appearing to the Register that the said Defendant has failed to plead, answer  
or demur to the said Bill to the date hereof, it is now, therefore, on motion of Complainant, ordered,  
adjudged and decreed by the Register that the said Bill of Complaint be, and it hereby is in all things  
taken as confessed against the said HERMAN BOWEN

\_\_\_\_\_ Defendant

This the 8th. day of October, 19 56

*W. J. ...* Register.

No. 3851

**CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA**

**In Equity.**

MARY NELL BOWEN

**Vs.**

HERMAN BOWEN

**DECREE PRO CONFESSO AFTER  
NOTICE BY REGISTERED MAIL**

Filed in office this 8th. day of  
October, 19 56

ALICE J. DUCK, Register

Entered in O. B. \_\_\_\_\_ Page \_\_\_\_\_

100 0000 - 0101 0000



Post Office Department  
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300  
(GPO)



Return to Alice J. Neuch  
(NAME OF SENDER)

Street and Number, } Box 239  
or Post Office Box, }

REGISTERED ARTICLE

No. \_\_\_\_\_ Post Office Bay Minette

INSURED PARCEL

No. \_\_\_\_\_ State Ala.

16-12421

DELIVERING  
EMPLOYEE

- Deliver ONLY to addressee
- Show address where delivered

3851

Received from the Postmaster the Registered or Insured Article, the number of which appears on the face of this return receipt.

1 Herman Bowers

(Signature or name of addressee)

2 \_\_\_\_\_  
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery 8-18-52, 19\_\_\_\_

FILED  
AUG 21 1956  
MET. DIST. REGISTER

Form 3811  
Rev. 4-54

U. S. GOVERNMENT PRINTING OFFICE 16-12421-3

MARY NELL BOWEN

vs.  
HERMAN BOWEN

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,           
~~Affidavit of non residence, Order of Service by Registered mail.~~  
Decree pro confesso on Service by Registered Mail; Register's affidavit  
of service by registered mail; <sup>O</sup>Ral testimony of complainants  
witnesses before commissioner.

and in behalf of Defendant upon         

*Arthur C. Epperson*  
\* Solicitor for Complainant

*Alice J. Blane*  
Register.

No. ....

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
**Circuit Court of Baldwin County**

MARY NELL BOWEN

vs.

HERMAN BOWEN

**NOTE OF TESTIMONY**

Filed in Open Court this .....  
day of **FILED** , 194

**COPIES OF 1956**

**ALICE L. BOWEN, Register.**

Printed by the Baldwin Times

MARY NELL BOWEN  
COMPLAINANT  
VS.  
HERMAN BOWEN  
RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Your complainant Mary Nell Bowen, respectfully represents and shows unto Your Honor:

1. That the complainant is over the age of twenty years and is a resident of said State and County, and has been a bona fide resident for more than one year next preceding the filing of this bill of complaint; that Herman Bowen is over the age of twenty-one years and whose residence is unknown but whose present address is Route, Box 137, ~~Lugoff~~, South Carolina. *Lugoff*

2. That your complainant and respondent were lawfully married on or about, to-wit: February 6, 1952, in Brewton, Alabama, and of this marriage is one minor child, Glenda Lee Bowen, born December 20, 1953, dependent upon the respondent.

3. Your complainant avers and charges that the said respondent did on or about the 14th day of July, 1956, and many times subsequent thereto assault, beat, hit and strike complainant; that said respondent has committed actual violence on her person attended with danger to her health or life; complainant avers and charges that respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

4. Complainant avers that said respondent is employed and making about \$50.00 a week; that the complainant owns no property and has no means of support for herself and minor child; and that said respondent has refused and failed to provide for the support and maintenance of the complainant and said minor child; your complainant further avers that she is without means to pay her solicitor of record for his services rendered and to be rendered in this suit.

The premises considered, your complainant prays that your Honor will order service to be had according to law upon said respondent, commanding him to appear and plead, answer or demur to this bill of complaint within the time required by law and that your Honor will hold a hearing and award the Complainant temporary care, control and custody of the said minor child, pending this suit, and that your Honor will order the Register of this Court to hold a reference and report to this court that would be a reasonable amount to be allowed your complainant as alimony for her support and maintenance and the support and maintenance of the said minor child, pending this suit, and what would be a reasonable amount to be allowed your complainant's solicitor for his services rendered and to be rendered in this suit, and that upon a final hearing of this cause, that your Honor will render a decree divorcing your complainant from the respondent, granting the complainant permanent care, control and custody of the said minor child, permanent alimony for her support and maintenance and support and maintenance for said minor child, and your complainant prays for such other, further or general relief to which she may be entitled.

*Arthur C. Epperson*  
SOLICITOR FOR COMPLAINANT

LOPEZ, VIV.  
VLOOBEX VL IVN  
SELRIB C. EBERSON

2821  
Lugoff

Extra copy 3851

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

MARY NELL BOWEN  
COMPLAINANT  
VS.  
HERMAN BOWEN  
RESPONDENT

BILL OF COMPLAINT

FILED  
AUG 26 1956

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALA.

DEPARTMENT OF REVENUE  
STATE OF ALABAMA  
TOLSON

RECEIVED  
AUG 26 1956  
MARY NELL BOWEN

IN EQUITY  
BY THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

*[Handwritten signature]*  
ARTHUR C. EPPERSON

*[Faint, mostly illegible text, likely bleed-through from the reverse side of the page]*

**THE STATE OF ALABAMA**  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

MARY NELL BOWEN Complainant

VS.

HERMAN BOWEN Respondent

I, JUSTINE GARDNER

as Register and Commissioner

have called and caused to come before me MARY NELL BOWEN

AND MRS. I. D. DAUGHTERY

witness ES named in the Requirement for Oral Examination, on the      day of OCTOBER

<sup>58\*56</sup>194    , at the office of JUSTINE GARDNER

in Foley, Ala., Alabama, and having first sworn said Witness      to speak the

truth, the whole truth, and nothing but the truth, the said MARY NELL BOWEN

& MRS. I. D. DAUGHTERY doth depose and say as follows:

MY name is MARY Nell Bowen. I Am over the age of twenty Y<sup>E</sup>ars. I Am a resident of Baldwin County, Alabama and have been for more than one year before filing this bill for divorce. Herman Bowen is over the age of twentyone years and was a resident of BALDwin COuntY, Alabama but now is working in Lugoff, SOuth Carolina. I Married HERMan Bowen, lawfully in BREwton, Alabama FEbruary 6, 1952. We have one child Glenda Lee Bowen who is nearly three years old.

Herman has been mean to me nearly every since we have been married and he has beat me several times. WE had been living in Bon Secour, Alabama up and until about a year ago when he got a chance to go to Lugoff, SOuth Carolina and get a job on a new plant that was beqng built there as a carpenters helper. I Went up there after he had been there a couple of weeks to live with him there while he was on that job. HE made better money than he had been used to making and started to spend quite a bit on drinking. HE began getting meaner and meaner to me and the babyand finally one night he came home after he had been drinking and the baby was not feeling good. HE slapped the baby very hard and cursed her to make her stop crying and then when I S<sup>a</sup>id something to him for doing it he jumped on me and knocked me down and threatened to kill me and the baby both. I Knew how mean he was and I was very much afraid that he would do it so I Didn'T try to fight back or say anymore. I Left him the next day while he was at work and came back to Baldwin County to my folks. I am afraid of him and that he will severally hurt or kill me and the baby if I continued to live with him.

HERman Bowen is employed by the Building contractor building the DU Pont PLAnt at Lugoff SOuth C rolina and makes about sixty DOLLars a week. HE is capable of earning that much a week in any nuber of jobs that he can do and I Think that Twenty DOLLars a week would be a reasonable amount of alimony that he could pay for my and the baby'S support.

*Mary Nell Simmons Bowen*

My name is MRs. I. D. Daughtery. I Live at Bon Secour, Alabama and have been residing their for the last ten years. Mary NEll Bowen is my sister. SHE married Herman Bowen at BREwton, ALabama, FEbruary 6, 1952. THEY have one daughter three years of age. THEY lived in BON Secour, Alabama. up till about a year ago when he went to work in SOuth Carolina. Mary Nell came home about eight monthes ago from there with bruises on her face and shoulders and arms, and the baby'S face was bruised. SHE said that HERman jumped on her and slapped the baby and threatened to kill them.

*Mrs. I. D. Daughtery*

3851

ORAL EXAMINATION.

I, JUSTINE GARDNER, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness ES and read over to THEM and THEY signed the same in the presence of myself JUSTINE GARDNER

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ES or had proom made before me of the identity of said witness; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this \_\_\_\_\_ day of OCTOBER, 194 %\*56

*Justice E. Gardner* (L.S.)

NO. \_\_\_\_\_ PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

vs. Complainant

Respondent.

Oral Deposition

Filed \_\_\_\_\_, 194 \_\_\_\_\_

Register.

Recorded in

Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.