

1874-34

Santhampton County - Chancery

Petersburg Iron Works vs Moore, H. C.

"H. Satisfy Judgment"

Petersburg Iron
Works -

vs 5 Acres

H. Moore & Co

June term.
1874

To be entered.

Geo. F. Blount

Petersburg Iron Works

vs $\frac{1}{3}$ Decree -

H. C. Moore &

On motion of the plaintiff, this
cause is ordered to be removed
from the docket.

Executed by delivering Henry &
Moses & Mary Rhes wife & Moses
Joyner each a Copy of their Summary
on the 21st day of April 1834.

W. Wrigg's Skiff

St. Petersburg Iron Works
a { Sund. City.
Moore &
1874 May Kules

$$\begin{array}{r} 312 \\ 330 \\ \hline 342 \end{array}$$

The Commonwealth of Virginia

To the Sheriff of Southampton County--Greeting :

WE COMMAND YOU to summon

N. C. Moore & Mary R. his wife,
Moses Joyner

if *they* be found within your bailiwick, to appear at the Clerk's Office of our *Circuit*
Court of Southampton county, at the Rules to be holden for the said Court on the first Monday in

Mary next to answer a bill in Chancery exhibited against them in our said Court--
by the Petersburg Iron Works.

And have then there this writ. Witness LITTLETON R. EDWARDS, Clerk of our said Court, at the
Court-house, this *14th* day of *April* A. D. 1874, in the *98th*
year of the Commonwealth.

L. R. Edwards C. C.

Southampton Circuit Court November Term 1873.

The Petersburg Iron Works -

against
H. C. Moore

Plff.

Def.

In Case -

The judgment obtained at the Rules not having been set aside and the plaintiff being now entitled to a final judgment. It is therefore considered ^{by the Court} that the plaintiff recover against the defendant, one hundred and four dollars sixty cents the amount of the account upon which this action was brought, with legal interest thereon from January 1st 1873, till paid, and the costs by him in this behalf expended.

Attest -

Teste, L. P. Edwards C. C.

154
Petersburg Lion Works

or $\frac{1}{3}$ Bill Exhibits
3

H. C. Moore & Co

D. B. Prince & Co

Clk	13.40
Sh	1.50
Law f	16.00
	20.90

To the Hon. Geo. Blow. Judge of the Circuit
Court of Southampton - In Chancery.

Humbly Complaining sheweth unto your
Honor your complainant the Petersburg Iron
Works, that at the Nov: Term 1873 of the
Circuit Court of Southampton, your Com-
plainant obtained a judgment against
H. B. Moore for \$104. 60, as will be seen
from a certified copy of same, herewith
filed marked (A) & prayed to be taken as
part of this bill - That upon said judgment
an execution of fieri facias has been issued &
returned "no effects". That the day on
which the Circuit Court for Southampton
County at the Nov Term 1873 met was
the 6th day of November. That on that
day H. B. Moore & Mary J. Moore his wife
executed a deed of bargain & sale to one
Moses Joyner, all of Southampton, convey-
ing certain Real Estate to said Joyner,
which said deed was acknowledged &
recorded on said 6th day of Nov: 1873, as
will more fully appear from a copy
of said deed, herewith filed, marked (B)
& prayed to be taken as part of this bill -
That your Complainant is advised that
the lien of its judgment was complete before
the recording of said deed, was much

Exhibit (A)

Exhibit (B)

as in legal construction the whole term of the Court is regarded but as one day, and that day is always referred to the first day or commencement of the term, and that such being the fact, the purchaser of said Real Estate took subject to your Complainant's judgment lien.

In consideration of all which, and inasmuch as your Complainant is remediless in the premises except by the aid of a Court of Chancery where matters of this kind are properly cognizable, to the end therefore that justice may be done, your Complainant prays that H. B. Moore & Mary J. his wife & Moser Joyner be made parties defendant to this bill & compelled to answer the allegations thereof. That a Commissioner of this Court may be directed to take an account of your Complainant's demand and all other liens against H. B. Moore distinguishing their priority-, also an account of the ~~Real Estate~~ annual & absolute value of any Real Estate now owned by said Moore, and of the Real Estate conveyed by said Moore & wife to Moser Joyner by deed dated Nov 6. 1873, And if it should turn out that the rents & profits of said Real Estate will

not satisfy your complainants' demand
in five years, that the same may be
sold, and the proceeds applied to the
the payments of your complainants'
debt. And that your Honor will grant
such other further & general relief in
the premises as the nature of this case
may require & to Equity may seem
meet. And as in duty bound, your
Complainant will ever pray &c., May it
please the Court &c. —

J. Whence p.c.