

1898-17

Southampton County Chancery

Jesse. Bah. vs Jane, Laura Mason

"Dance"

To the Honorable R. R. Pontis judge of the
circuit court of Southampton County in
chancery sitting

Humbly complaining from Chator
Bob Jones ^{Bob Jones} ~~Shunth~~ ^{that} on the
17th of January 1878 he was married in
the county of Southampton by the
Rev. J. J. Suttle to Laura Maim as more
fully appear by a copy of the
marriage license and of the certificate
of the Rev. J. J. Suttle herewith filed
marked exhibit A and prayed to be
taken as a part of this bill, That he
lives with the said Laura Jones from
the time his marriage except some
times when he was called away to
work at other places up to some
time in March 1893 when without
any cause or provocation she wilfully
abandoned and deserted him, his
home and home and his children
without cause or provocation has
never returned to him since and
still refuses to do so and ever since
that time has refused to perform
and discharge the legal and sacred
duties of wife and mother from

orator states further that there are
two children issue of the marriage
now living one with him and the
other with the mother. Gorn Orator
has been informed and so charges
that his wife Laura Jones since
leaving him has been guilty of
various acts of adultery and though
he has had no access to wife since
the time stated in this bill to wit
in March 1893 she is now far
advanced in pregnancy and Gorn
Orator feels constrained in justice
to himself to ask the court to
release him from this untidy bond
of marriage from a corrupt, unfaithful
and abandoned woman.

In Tender consideration whereof
and inasmuch as Gorn Orator is
without adequate remedy in a
court of law and only entitled to relief
in a court of equity where such
matters are peculiarly cognizable
he therefore prays that his wife
Laura Jones may be made a party
defendant to this bill and that the
court would compel her to free

and proper answer make to the
allegations herein contained as if
she had been examined more fully
and specially interrogated that the
court would by its decree divorce
your Orator from the bond of
marriage with Laura Jones with
the right to marry again if he
should see fit and make such
disposition of the children issue
of the marriage as its court may
see fit and proper that one of
the children a girl age thirteen
is now living with your Orator
and he is willing to keep that
and that the boy now fifteen
years is living with his wife
Laura and he is willing to take
the boy also if the mother so
desires Also that the court would
grant such other and general
relief the premises considered as
equity may dictate and the nature
of his case may require and as
in duty bound your Orator will
ever pray he

his
B. F. Jones
Attorney
Shanderson & Co.

Virginia:

In the Clerk's Office of the Circuit Court
of Southampton County.

This day personally appeared before me,
B. J. Jones and made oath that the facts
set forth in the foregoing writing are
true to the best of his knowledge and
belief.

Given under my hand this 12th day
of July 1897

L. A. Gay C. C.

Jones
B. J. Jones
C. C. Jones

1897. 2nd. July 12th. J. J. Jones

L. A. Gay C. C.

MARRIAGE LICENSE



Virginia, Southampton County to wit:

To any Person Licensed to Celebrate Marriages:

You are hereby authorized to join together in the Holy State of Matrimony, according to the rites and ceremonies of your Church, or religious denomination, and the laws of the Commonwealth of Virginia,

Bob Jones
and Laura Mason

Given under my hand, as Clerk of the County Court
of Southampton this 12 day of January 1878
L. R. Edwards Clerk.

CERTIFICATE TO OBTAIN A MARRIAGE LICENSE,
TO BE ANNEXED TO THE LICENSE, REQUIRED BY SECTION 2229 OF THE CODE OF VIRGINIA.

Time of Marriage, ...	Place of Husband's Birth, Southampton Co.
Place of Marriage, Southampton Co.	Place of Wife's Birth, ...
Full Names of Parties Married, Bob Jones & Laura Mason.	Place of Husband's Residence, ...
Color, Col.	Place of Wife's Residence, ...
Age of Husband, 23	Names of Husband's Parents, ...
Age of Wife, 18	Names of Wife's Parents, ...
Condition of Husband (widowed or single), Single	Occupation of Husband, Farmer
Condition of Wife (widowed or single), ...	

Given under my hand this 12 day of January 1878
L. R. Edwards Clerk.
Attest: B. J. McDonald, Ck.

MINISTER'S RETURN OF MARRIAGE.

I Certify, That on the 17 day of January 1878
at Hockfield Southampton Co. I united in Marriage the
above-named and described parties, under authority of the annexed License.

The Minister celebrating a marriage, is required, within TEN days thereafter, to return the license to the Office of the Clerk who issued the same
with an endorsement thereon of the FACT of such marriage, and of the TIME and PLACE of celebrating the same

Jones Bob.

W. } copy of Ma. License
Jones Laura 2. N"

1897. 2" July Rules filed
L. A. Kay b. b.

Boh Jones

vs. Sam. L. Chy.

Laura Jones

1897. 2nd July Return.

Leis. let.

I hereby acknowledge
due and legal
service of the within
summons given
under my hand
this 23rd day of
June 1897

Laura ^{has} Jones
Wife

Witness

H. B. Briggs

Shands & son p. g.

THE COMMONWEALTH OF VIRGINIA,

To the Sheriff of Southampton County--Greeting :

We command you to summon Laura Jones

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 3rd Monday in July next, to answer a bill in Chancery exhibited against her in our said Court by Robt Jones

And this she shall in no wise omit under penalty of law. And have then there this writ.

WITNESS, L. A. GAY, Clerk of our said Court, at the Courthouse, this 22nd day of June, 1897, in the 12th year of the Commonwealth.

Teste: L. A. Gay C. C.

Jones Bob

vs. [?] Statement of Costs

Jones Laura

Jones Bob

vs } Statement of Costs

Jones Laura

Sum. 25. Copy 13. Receipt 18. Attorney 10. = .66

Docket 18. Rules 1.00. Entering return 35 = 1.53

Fil. bill 15. Oath of plaintiff 15. Fil. 24. 15. Copy 24. 25 = .70

Fil. notice 15. D. depositions 15. 1 Deane Copy 72 = 1.02

Law Costs &c. 40. Filing away papers 25 = .65

Future Costs 72 = .72

blank \$5.28

shff. 0.00

Law fee 16.50

\$21.78

Fee of E. M. Harris J.P. for taking depositions 1.50

\$23.28

A copy.

Test: L. A. Gay G. G.

Jones

W. } Statement of Rules

Jones

Bob Jones.

Plaintiff

vs.

Laura Jones

Defendant

1897. 22nd. June. Process issued to 2nd. July Rules

1897. 2nd. July Rules. Process returned Executed.

Bill & Exhibits filed.

Deceit nisi vs. Defendant

1897. 1st. Aug. Rules. Bill Taken for confessed and

cause set for hearing

But Jones
Statement of code
Goreau Jones

Jones Bob

vs. { Statement of Crow
Jones Laura

Sum 25, Copy 13, receipt 18 atty, 10 = 66

Docket 18, Reels 1.00, Entering return 35 = 1.53
Docket of Plaintiff 1.50

Filing brief 15, D. Exhibits 15, Copy 24, 25 = 75
Fil. notes 15

Filing depositions 15, D. exam copy 72 = 107

Law costs 40, Filing away papers 25 = 65

Future costs 72 72

Ans. L. A. 4ay. by B. F. M.

blanc 5.28

Shff. 0.00

Law 12, 16.50

21.78

Fee of E. M. Harris L.P.

1.50

23.28

Bob Jones

vs 3 Notice

Laura Jones

I hereby acknowledge
due and legal ser-
vice of the within
notice & summons
given under my
hand this 23rd
day of June 1897

W
Laura Jones
mark

Witness

H. H. Grigg

1897. 20th. June. Fien

To Laura Jones

I hereby give you
notice that I shall proceed on
July 22nd 1897 at 10. a. m. at the
store of T. B. Peete at Branchville Va
to take depositions of Alfred Morris
and others to be read as
evidence in my behalf in
a certain chancery case now
pending in the Circuit Court
of Southampton County Va
wherein I am plaintiff
and you are defendant

Bob Jones

June 23rd 1897

By Counsel

Depositions of Alfred Harris and
others taken at Branchville Southampton
County Va on the 22nd of July 1897
at the store house of J. C. Pate between
the hours of 10 A. M. and sunset in the
chamery suit of Robt Jones vs Laura
Jones before me Edmund Harris
a justice of the peace for the County
of Southampton to be read as evidence
in behalf of the plaintiffs Robt Jones
and pursuant to notice duly given

W S Francis Having been first
duly sworn deposes and says as follows

Q Please state your age, occupation, residence
and so you know the parties to this
suit -

A I am sixty five (65) years old, Farmer
and dealer in Poultry and Cattle.
Resides in Southampton County most
all the time and know the parties
to this suit - very well, and know
that Robt Jones was duly married
to Laura Mason and lived together for
several years as man and wife in South-
ampton County Virginia.

Q Will you please state whether or
not they are now living together

as man and wife?

A. They are not, she left him ^{more than} four years ago, and have not lived together since, and ^{she} refuses to come and live with ^{him} again,

Q. Did Bob Jones take care of his wife as well as his means would admit while she was with him,

et al.

A. Yes I think he did.

Q. When did you last see Laura Jones

A. Week before last.

Q. Will you state what her condition was?

A. She looked very large in the waist - my decided impression was, she was far gone in pregnancy, had every indication to that effect for I have seen her repeatedly before when she did not look that way, and I can state that she told me she had not lived with Bob Jones as man and wife in four or five years. She has gone to Norfolk Va. and is there I think just now.

Her husband Bob Jones "remain"
at his home at Mr J Woodard
in Southampton County Virginia
and further this deponent says
not

signed

W.S. Francis

The witness Alford Harris being
duly sworn, deposes and says
as follows

2 State your age, occupation, residence
and do you know the parties to
the suit.

A. I am 48 years old, Farmer, live
at J Woodard Southampton County
Virginia, and have known parties
to this suit - all my life, know
that Bob Jones married Laura
Mason in this county nearly
Twenty years ago & lived ^{with} her many years
as man & wife

2 Do they live together as man
& wife now?

A no Sir do not. She left him

nearly five years ago of her own
accord

Q. Did he support her and take
care of her while she was with
him?

A. Yes sir. He did, as they lived
at Mr Woodards when I live and I
saw them often and know he
took care of her best he could.

Q. Do you know whether he has
tried to get her to come back and
live with him since she left him

A. I do know he has tried repeatedly
to get her to come back and
live with him for I have been
with him once or twice when
he tried to get her to do so and
she said she would not live with
him again. She has been leading
a bad life ever since she left him.
She showed me a man that she said
was taking care of her and was sup-
porting her and stayed in the
room with her when he wanted
to.

Q Do you know whether or not Bob Jones has lived with his wife or has had anything to do with her, as man and wife since she left him.

A The best of my knowledge and belief he has not he is just as clear of that as I am and I am ^{of that} clear. I know she tried to get her to come back and live with him, but she would not. Said she never was going to have anything more to do with him. He has not seen her for more than twelve months.

Q How many children have they living

A Two living one a girl living with her father and the other a boy living with his mother. Bob is willing to take care both children if his wife would let him, and is taking care of the one that is living with him. He is an industrious good working man.

Jones Beth

vs 3 Final Decree

Jones Laura

as nothing further is to be
done in this cause, ordered that
it be removed from the docket

James Park

12 3/4 Final Price

James L. L.

To be entered

Oct 4th 1898

Robert L. L.

Entered Page # 226

Jones Ash

12 3rd Decr

Jones Lanza

To be entered
Sept 29, from 1897
Robert D. Hunt

Entd Page - 169 -

Jones Bob
vs 3 Deene
Jones Laura

This cause come on this day to heard on the plaintiffs bill, and exhibit filed therewith, and examination of witnesses, and was argued by Counsel. on Consideration whereof, the Court doth adjudge, order and decree that the marriage heretofore had and solemnized between the defendant, Laura Jones, and the plaintiff, Bob Jones, shall be, and the same is, hereby dissolved; and that the said Bob Jones, be forever divorced from the said Laura Jones.