

1909-56

Southampton County Chancery

Jane, Luke vs. Jane, Nina (Story)

Deceit

Jane, Luke

Jane, Nina
(Story)

To the Honorable Robert R. Prentiss, Judge of the Circuit Court of Southampton County, Virginia:

Complaining sheweth unto the court, your orator, Luther Jones, that he is a citizen of Southampton County, Virginia, and that on the 4th day of May 1899 he was married to Nina Story, as will appear from a copy of the marriage license hereto annexed, marked exhibit "A" and prayed to be read as a part of this bill, and that since such marriage your orator has contributed freely from his limited means to the support and comfort of his wife doing everything in his power for the promotion of her happiness and notwithstanding his constancy and loyalty to his wife she has been wholly unfaithful and quit your orators home and is now leading a life of adultery and prostitution.

In tender consideration whereof and forasmuch as your orator is remediless in the premises, save in a court of equity where matters of this kind are alone cognizable, he prays that Nina Jones may be made a party defendant to this bill and required to answer the same, but answer on oath is hereby waived, that proper process may issue, that a divorce a vinculo matrimonii may be granted your orator and that such other further and general relief may be granted your orator as the nature of his case may require or to equity shall seem meet. And your orator will ever pray &c.

p.q.

State of Virginia,

Southampton County, to wit: I, R. B. Turner, a Notary Public in and for said County, State of Virginia, do hereby certify that Luther Jones personally appeared before me in my County aforesaid and made oath that the facts set forth in the above bill are true, and I further certify that he subscribed to the same before at the same time.

Given under my hand this 10th day of October 1908.

Notary Public

My commission expires on the 29 day of April 1909.

C. A. BELL,

Town Sergeant.

Franklin, Va., Oct 8 1905

My Dear Mr McFerson

Please find
inclosed notice served on Hine
Strong at request of Mr Watkins
I suppose the return on this paper
is to be filed with other papers in
this suit

Yours Truly
C. A. Bell

Luther Jones,

Vs.

In Chancery.

Nina Jones,

1905, September 30th: Process issued to 1st October Rules:

1905, 1st October Rules: Process returned executed::

Bill not filed.

and Exhibit

1905, October 11th, Bill filed, Cause set for hearing.

^

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,

Luther Jones -

and Nimay G. Story -

Given under my hand, as Clerk of the County Court of Southampton this 4th day of May 1899.

B. F. McLeavelle Clerk.

CERTIFICATE TO OBTAIN A MARRIAGE LICENSE,
TO BE ANNEXED TO THE LICENSE, REQUIRED BY SECTION 2229 OF THE CODE OF VIRGINIA, AS AMENDED BY ACT OF FEBRUARY 3, 1900.

Time of Marriage, ...	Place of Husband's Birth, N. C.
Place of Marriage, Southampton	Place of Wife's Birth, Southampton
Full Names of Parties Married, Luther Jones	Place of Husband's Residence, "
Nimay G. Story	Place of Wife's Residence, "
Color, Dark	Names of Husband's Parents, Wm. & Hester
Age of Husband, 23 years	Jones -
Age of Wife, 21 "	Names of Wife's Parents, James & Ann
Condition of Husband (widowed or single or divorced) single	Story -
Condition of Wife (widowed or single or divorced) "	Occupation of Husband, Laborer

Given under my hand this 4th day of May 1899

B. F. McLeavelle Clerk.

Certificate of Time and Place of Marriage.

I, _____, a _____ of the _____ Church, or religious order of that name, do certify that on the 4th day of May 1899, at My house in Franklin under authority of the above License, I united in Marriage the persons named and described therein.

Given under my hand this _____ day of _____ 19____.

Joseph Gregory

The Minister celebrating a marriage is required, within two months 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.

-1909-

Jones

Spia in Chy

Jones

1905. 1 Oct. Rules.

Executed Oct 2nd 1905
by delivering in person
a true copy of the
within certificate to
Mona Jones.

J. H. Gilman Sheriff

THE COMMONWEALTH OF VIRGINIA.

TO THE SHERIFF OF SOUTHAMPTON COUNTY, GREETING;
WE COMMAND YOU TO SUMMON *Mina 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 *first*....Monday in *October* 190*5*..
~~next~~, to answer a Bill in Chancery exhibited against *her*.....in our said
Court by *Luther Jones*

And this *she*.....shall in nowise omit under penalty of law. And have then there this
writ.

Witness, B. F. McLEMORE, Clerk of our said Court, at the Courthouse, this
30"...day of *September*....., 190*5*..., in the 1*3**0*...year of the Commonwealth.

Teste :

B. F. McLemore, C. C.

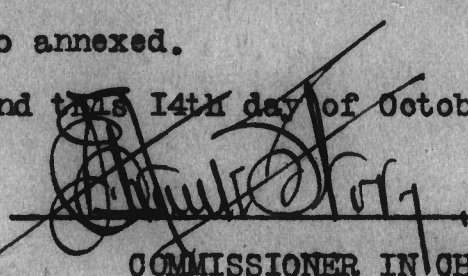
Some
To 3 Propositions.
Some

STATE OF VIRGINIA, {
Southampton County, { to-wit:

I, E. Frank Story, a Commissioner in Chancery for the Circuit Court in and for the County aforesaid, in the state of Virginia, do hereby certify that the foregoing depositions of William Peterson and Larnie Eppes, were duly taken, sworn to and subscribed before me, at the time and place and for the purposes stated in the caption hereto annexed.

n Given under my hand this 14th day of October, 1905.

Com'r's. fee.
\$5.00.


COMMISSIONER IN CHANCERY.

Ans. 4. I use to work in the stables situated on the very same lot whereon Nina Jones lives, and I saw her day and night for several months, and it was commonly talked that she was making her living by immoral practices, and I further knew by my personal experience with her that she was an immoral woman.

And further this deponent saith not.

John F. Jones
James F. Jones
Mull

Q. 1. How long have you known Nina Jones?

Ans. I have known her about two years ago, I think, and since that time she has been leading a fast life, I guess that she has been leading a life of prostitution, committing sin, and leading a life of immoral practices and depravity.

Q. 2. How do you know of her immoral practices?

Ans. About two hundred yards.

Q. 3. How near place of business was it to her or adjoining her house?

Ans. Yes.

Q. 4. How often did you see her, did you see her frequent her house at the

at the house, and at the day school?

Ans. Yes, I saw her a good long time there.

Q. 5. How often did you see her at the house?

Ans. I saw her a good long time there.

The witness further says being with him answers as follows:

Q. 1. How long have you known Nina Jones?

Ans. About two years ago, I think, and since that time she has been leading a fast life, I guess that she has been leading a life of prostitution, committing sin, and leading a life of immoral practices and depravity.

Q. 2. How do you know of her immoral practices?

Ans. About two hundred yards.

Q. 3. How near place of business was it to her or adjoining her house?

Ans. Yes.

Q. 4. How often did you see her, did you see her frequent her house at the

at the house, and at the day school?

Ans. Yes, I saw her a good long time there.

Q. 5. How often did you see her at the house?

Ans. I saw her a good long time there.

Q. 6. How often did you see her at the house?

Ans. I saw her a good long time there.

The witness william Peaterson being duly sworn deposes as follows:

Q.1.State your name,age,occupation and residence?

William Peaterson,27,liveryman,Franklin,Va.

Do you know the parties to this suit?

Ans. Yes,very well.

Q.3.What has been the conduct of the defendant,Nina Jones since her marriage to Luther Jones?

Ans.She quit Luther Jones about two years ago,I think,and since that time she has been leading a fast life.I mean that she has been leading a life of prostitution accomodating men and leading a life of generall immorality and depravity.

Q.4.How far is your place of business from her house?

Ans.About thre hundred yards.

Q.5.Did your place of business use to be near or adjoining her house?

Ans. Yes.

While you were located near her,did you see men frequent her house at the in the night time and in the day time?

Ans.Yes,I use to see a good many go there.

And further this deponent saith not.

William Peaterson
many

The witness Larney Eppes being duly Sworn deposes as follows:

State your name,age,occupation and residence?

Larney Eppes,age 21,Laborer,Franklin,Va.

Q.2.Do you know the parties to this suit?

Ans.Yes,very well.

Q.3.State please what has been the conduct of Nina Jones,the defendant,since she has been married to Luther Jones,the plaintiff in this suit?

Ans.She has not been treating Luther right,she been getting around here and fooling with other men,and been leading a life of protitution,and a general immoral life.Men goi into her house most any time and I know of my own personal knowledge that they go there for immoral purposes,and she does nothing to make living,and has no property or any means of support,except what she makes by immoral practices.

Q.4.How did you manage to learn so much about her habits and immoral practices?

The depositions of William Peterson and others,
taken before me, E. Frank Story, a Commissioner in Chancery
for the Circuit Court of Southampton County, Virginia, on
the 14th day of October, 1905, between the hours of 9 A. M.
and 6 P. M., ^{at Franklin, Va.} to be read as evidence on behalf of Luther Jones
in a certain suit in equity depending in the Circuit Court of
Southampton County, Virginia, wherein Nina Jones is defendant
and Luther Jones is plaintiff.

PRESENT:

R. E. L. Watkins for the plaintiff.

To Nina Jones:

Take notice, that on the 14th. day of October 1905, at the office of R.E.L. Watkins in Franklin, Va., between the hours of 9 a.m. and 6 p.m. of that day, I shall proceed to take the depositions of Larnay Eppes and others to be read as evidence, in my behalf, in a certain suit in equity depending in the Circuit Court for Southampton County, wherein I am plaintiff and you are defendant; and if, from any cause, the taking of said depositions be not commenced, or if commenced be not concluded on that day, the taking thereof will be adjourned from day to day at the same place and between the same hours until the same shall be completed.

Respectfully yours,

Suther Jones
By *R.E.L. Watkins*, his Attorney.