

have deed set aside and
declared fraudulent; that this land
conveyed may be sold & the proceeds
applied to the payment of debt.

Vick

v. 3 Bill & Ex.

Fellon

1900. 2nd Sept Rules filed

L. A. Hay L. L.

Invt. J. A. J. L. J.

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

In Chancery.

Humbly complaining sheweth unto your Honor your complainant, W.P. Vick, of the County of Southampton, Virginia, that on the 4th day of November 1884, Hansel Johnson was indebted to J.E. Vicks, in the sum of \$14.75, evidenced by bond, which said bond was afterwards, towit, on the day of assigned for value by said J.E. Vicks to your complainant, and that no part of the said debt has ever been paid by said Hansel Johnson or any one for him to said J.E. Vicks or your complainant but the same is now wholly due and owing with interest unto your complainant. All of which will more fully appear from said bond herewith filed as exhibit "A" and prayed to be read as a part of this bill.

That on the 20th day of August 1886 the said Hansel Johnson was indebted to Richard M. Stephenson in the sum of \$32.93, and executed his bond to said Stephenson for said amount, which said bond was afterwards, towit, on the day of assigned to your complainant by said Stephenson for value, and that no part of the said debt has ever been paid by said Hansel Johnson or any one for him to the said Stephenson or your complainant, but the same is now wholly due and owing with interest unto ~~the~~ your complainant. All of which will appear from the said bond herewith filed as exhibit "B" and prayed to be read as a part of this bill.

That being so indebted to your complainant as aforesaid the said Hansel Johnson, on the 9th day of January 1896, with the intent to hinder, delay and defraud your complainant and other creditors, conveyed to Georgeanna Felton who is sometimes called Georgeanna Warren, that certain tract or parcel of land of which he was then seized and possessed, situate in the County of Southampton Virginia, near Millfield Baptist Church, containing by

estimation forty seven acres, and bounded by the lands of A.J. Crocker, Gus Crocker and the estate of Dr. S.B. Kello.

Your complainant says that the said conveyance was made ~~###~~ without consideration deemed valuable in law, and was made with intent to hinder, delay and defraud your complainant and the other creditors of the said Hansel Johnson. That if indeed there was any consideration the same was so inadequate as to be shocking to the conscience of this Honorable Court.

Your complainant is advised that he has the right to have # the said deed set aside as to his debt, and the land mentioned therein sold and the proceeds applied to the payment of his debt.

That since the assignment of the said bonds and the conveyance as aforesaid the said Hansel Johnson has departed this life.

to wit on the day of 189

In tender consideration whereof and inasmuch as your complainant is without remedy save in a court of equity where all such matters are alone and properly cognizable, to the end that justice may be done, your complainant prays that the said Georgeanna Felton, who is also sometimes called Georgeanna Warren, may be made a party defendant to this bill, and be required to answer the # same, though answer under oath is waived; that proper process # issue, that the deed from said Hansel Johnson to said Georgeanna Warren may be declared fraudulent as to your complainant, and set aside as to him and that the land therein conveyed may be sold and the proceeds applied to the payment of the debt of your complainant; that all proper orders and decrees may be entered, and proper enquiries directed and taken, and that such other further general and special relief may be granted your complainant as the nature of his case may require or to equity shall seem meet. And your complainant will ever pray etc.

Notice is hereby given that the Court will be asked to allow a reasonable fee to plaintiff's counsel out of any funds coming under the Control of the Court in this cause.

Robert B. Blanchard - J.

 \$32.73

On demand, I promise to pay Richard M. Stephenson, the sum of Thirty two Dollars and Twenty three cents, for value received. I do hereby waive all exemption allowed by the Constitution of Virginia, to this debt. Given under my hand and seal this 21st day of August 1886

Witness:

Robt. G. Stephenson

Hansel H. Johnson (Seal.)

(Seal.)



Southampton County, Va., November 4th 1886

one Day after date, with interest from date, I promise to pay unto J. E. Vick the just and full sum of Twenty two dollars good and lawful money for value received, and I hereby waive the benefit of my homestead exemption as to this debt. Witness my hand and seal this 4th day of November 1886

Witness

E. L. Gardner

Hansel H. Johnson (Seal.)

mark

(Seal.)

(Seal.)

W. J. Vick

Plaintiff

vs.

Georganna Felton, Sometimes

Called Georganna Warren } Defendant

1900. 13th September, Process issued to 4th Sept. Rules

1900. 4th Sept. Rules. Process returned executed

Bill and exhibits filed.

Deceit nisi vs. Defendant

1900. 1st. Oct. Rules. Bill Taken for confessed

and Cause set for hearing

Vick

vs } Statement of Rules
Felton

W. P. Vick

Exhibitor of
or 3 defendant

Georgiana Felton

Southampton Circuit Court

1900. 1st Dec. Term

L. A. May C. G.

M. G. MASON,
Attorney & Counselor at Law,
WAKEFIELD, VA.

The answer of Georganna Felton to a bill of complaint exhibited against her in the Circuit Court of Southampton County by W.P. Vick.

This respondent having and receiving unto herself the benefit of all just exception that may be had or taken to the said bill of complaint for answer thereto or to so much thereof as she is advised it is necessary or material for her to make answer to, answers and says;

That it is true as charged in the said bill of complaint that on the 9th day of January in the year 1896 Hensel Johnson conveyed by deed to this respondent, who was then married to Jack Warren and was known as and called Georganna Warren, a tract of land estimated to contain 47 acres, situated near Milfield Baptist Church in Southampton County, Virginia and bounded by the lands of A.J. Crocker, Geo. Crocker, Dr. S.B. Kees and others.

This respondent's present name is Georganna Felton by which name she is known and called.

But this respondent denies the allegation in the said bill that the said deed of conveyance was without

Consideration deemed valuable in law, and says that the said allegation is not true.

This respondent answers further and says that she knows nothing whatever of the fraud set up and charged in the said bill of complaint; nor has she ever had any knowledge of any intent on the part of the said Samuel Johnson to delay, hinder or defraud his creditors, if any he had, or the complainant W.P. Vick, and this respondent does not believe there was any such intention on the part of the said Samuel Johnson; nor does this respondent believe there was any intention on his part to delay, hinder or defraud any one.

This respondent further answers and says that she knew nothing of the alleged indebtedness of the said Samuel Johnson when the said deed of conveyance was made to her, and did not know that he was indebted to any one at that time.

This respondent avers that she was a bona fide purchaser of the said 47 acres of land from

the said Heusel Johnson for a consideration
deemed valuable in law.

And now having fully answered this
respondent prays to be hence dismissed
with his reasonable costs in this be-
half expended. And she will ever pray

re
Witness

E. W. West.

Georgeanna ^{her} X Felton
mar 11

clb g. elbarn
pd

vide -1909-
vs
Hutton

De cree

act. 3rd 1900

[Signature]

25, Entered 332

W. P. York

vs.

Rebecca Helton

This cause come on this day to be heard on the bill of complaint, the demurrer to the said bill of the defendant in which the said plaintiff joins issue, on motion of the defendant for leave to file an answer, and was argued by counsel.

On consideration whereof ~~the~~ and by consent of parties entered of record in open court the court doth adjudge, order and decree that this cause may be submitted to the judge of this court in vacation for such decree and decision as might be made in term.

And the defendant is allowed sixty days in which to file an answer.

Vick

vs } State: of costs to date.

Fulton

Sum. 25, 1 exp. 13, receipt 18, atty. 10, docket 18 = 84

Rules 1.00, enter return 35, fil. bill 15, do. ex. 15 = 1.65

do ans. of defendant 15, replication 15 = 30

1 Decree 36, Tax costs 12, 40 = 76

6 continuances on the docket \$1.50 = 1.50

Tax costs 3 years @ 10⁰⁰ 30 = 30

Dec. 3rd 1903.

to L. W. K. \$5.35

shff. 50

Law re. 6.50

Total:

\$12.35

L. A. Gay 4.4.

Vick

vs. } Spa: In chy.

Fulton.

1900. 2. Sept. Rules

Leir. Ct.

Executed Sept-14-1900
by delivering a copy of this
Commission to the within
named parties defendant

Collier's Sept.

for J. W. Williams

J. N. Sebrill Jr.

(1)

J. N. Sebrill Jr. p. 9

THE COMMONWEALTH OF VIRGINIA,

To the Sheriff of Southampton County--Greeting:

We command you to summon Georganna Felton, sometimes
called Georganna Warren

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 Sept. 1900 next, to answer a bill in Chancery
exhibited against her in our said Court by H. P. Vick

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 13th day of
September, 1900, in the 12th year of the Commonwealth.

Teste: L. A. Gay C. C.

A Copy—Teste: _____ C. C.