

1911-09

Sanikiluk County Chancery

Jane, Robert vs Jane, Minnie (Harris)

Alfred

CHANCERY CAUSE

ROBERT JONES
VS ----- DIVORCE
MINNIE JONES

BILL

1911-1" July Rule filed -
Wm. L. L.

GUY T. HORNER
Attorney and Counsellor at Law
BOYKINS, VIRGINIA

6.150 deposited for Court.

IN THE CIRCUIT COURT OF THE COUNTY OF SOUTHAMPTON, VIRGINIA.
BILL: CHANCERY CAUSE.

ROBERT JONES)

VS

MINNIE JONES)

DIVORCE

To Hon. J. L. McLemore, judge of the Circuit
Court of the County of Southampton, Virginia:

Your orator, Robert Jones, humbly complaining,
would respectfully show unto your honor that:

1st. He resides in the County of Southampton, Virginia,
and has been domiciled in this state more than one year next
preceding the institution of this suit.

2nd. On the 22nd day of January, 1908, in the County of
Southampton, Virginia, your orator was married to one Minnie
Harris, with whom he has lived and cohabited together as hus-
band and wife in Southampton County, until Sept., 1906,
when they separated and have not since lived or cohabited to-
gether.

3rd. There are no children living as a result of this union.

4th. During their said marriage, to-wit: in Sept., 1906
in said county where they last cohabited, your orator's said
wife, Minnie Jones, disregarding her marriage vow, did aban-
don and desert him, and broke off the matrimonial cohabitation,
and at the time of the institution of this suit has abandoned
and deserted him for a period exceeding three years and during
this time has, without justification or excuse, voluntarilly
refused to renew the matrimonial cohabitation and live with
your orator.

See Book-

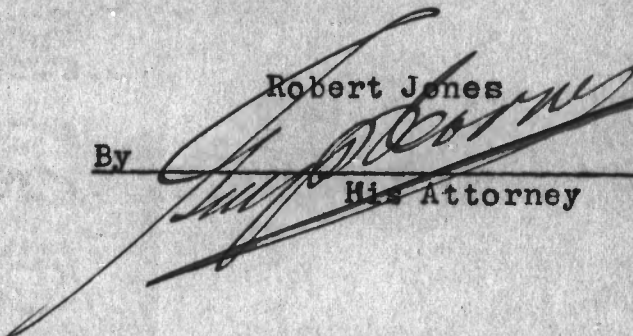
1904-07

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Wherefore, inasmuch as your orator is remediless save in a Court of Equity where such matters are properly cognizable, he prays that Minnie Jones be made a defendant to this bill, and be required to answer the same, but an answer under oath is waived; that, upon the hearing, your honor will grant unto your orator a divorce a vinculo matrimonii from the said Minnie Jones; and for other, further and general relief as in equity is meet and proper.

Robert Jones

By


His Attorney

Robert J. Jones
r { Special Chas.
Minnie Jones
1911. 11. July Rules.

Executed this 1st day
of July 1911, in the
city of Portsmouth
Virginia, by deliver-
ing a copy of the
within summons,
to Minnie Jones
in person.

R. E. Glaves Sergt.
By W. R. Hunt Depty "

1911 July 5th Ret. J. to our
Office

ROBERT JONES
VS ----- DIVORCE
MINNIE JONES

NOTICE TO TAKE DEPOSITIONS

GUY T. HORNER
Attorney and Counsellor at Law
BOYKINS, VIRGINIA

Guy T. Horner
Attorney and Counsellor at Law
Boykins, Virginia

IN THE CIRCUIT COURT OF THE COUNTY OF SOUTHAMPTON, VIRGINIA.

NOTICE TO TAKE DEPOSITIONS

ROBERT JONES)
VS ----- DIVORCE
MINNIE JONES)

TO MINNIE JONES:

Take notice that I shall, on the
13th day of July, 1911, at the office of my attor-
ney, Guy T. Horner, Boykins, Virginia, between the hours of ten
A. M. and three P. M., on that day proceed to take the deposi-
tions of Robert Jones and others, to be read in evidence in my
behalf, in a certain divorce suit depending in the Circuit Cou-
rt for the County of Southampton, wherein you are defendant and
I am plaintiff, and if for any cause the taking of the said dep-
ositions be not commenced on that day, or, if commenced, be not
concluded on that day, the taking of the same will be adjourned
and continued from day to day, or from time to time, at the same
place and between the same hours, until the same shall be com-
pleted.

Given under my hand this the 5th
day of July, 1911.

ROBERT JONES

By Guy T. Horner
HIS ATTORNEY

Guy T. Horner
Attorney and Counsellor at Law
Boykins, Virginia

IN THE CIRCUIT COURT OF THE COUNTY OF SOUTHAMPTON, VIRGINIA

IN THE CIRCUIT COURT OF THE COUNTY OF SOUTHAMPTON, VIRGINIA

ROBERT JONES

VS

MINNIE JONES

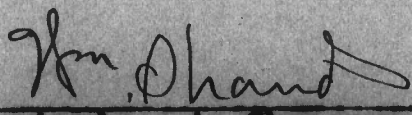
ROBERT JONES

VS

MINNIE JONES

In pursuance of the annexed notice your
Commissioner this day sat at Boykins, Va. for the purpose
of taking depositions in the above styled cause but owing
to the sickness of the plaintiff, Robert Jones, counsel
for the said Robert Jones moved an adjournment until the
2nd. Tuesday in August, 1911 at the same time and place as
mentioned in the annexed notice for the taking of the
same and there being no objection to the said motion
the taking of the said depositions was adjourned to the
time and place aforesaid.

Given under my hand this the 13th. day of
July, 1911.

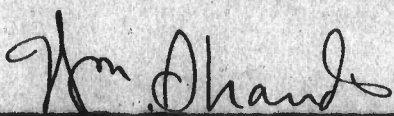

Commissioner in Chancery
for the Circuit Court of
the County of Southampton
Virginia.

IN THE CIRCUIT COURT OF THE COUNTY OF SOUTHAMPTON VIRGINIA.

ROBERT JONES
VS ----- DEPOSITIONS: Adjournment.
MINNIE JONES

The plaintiff in the above styled cause still remaining sick, and of motion of counsel for the said plaintiff, Robert Jones, the taking of deposition was adjourned to the 2nd. Tuesday in October, 1911, from the 2nd. Tuesday in August, 1911, at the same place and between the same hours as mentioned in the original notice which is hereto attached.

Done at Boykins, Va. this the 8th. day
of August, 1911.


Commissioner in Chancery
for the Circuit Court of
the County of Southampton
Virginia.

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,

Robert Jones
and Minnie Harris

Given under my hand, as Clerk of the Circuit Court of Southampton Co. this 19th day of October 1905.
A. B. Moore, 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, Jan. 22. 1905	Place of Husband's Birth, Southampton Co.
Place of Marriage, Southampton Co.	Place of Wife's Birth, " "
Full Names of Parties Married, Robert Jones and Minnie Harris	Place of Husband's Residence, " "
Color, Col.	Place of Wife's Residence, " "
Age of Husband, 22 years	Names of Husband's Parents, Allen and Jennie Jones
Age of Wife, 21 "	Names of Wife's Parents, Henry and Alice Harris
Condition of Husband (widowed or single or divorced) Single	Occupation of Husband, Laborer
Condition of Wife (widowed or single or divorced) "	

Given under my hand this 19th day of Jan. 1905.
A. B. Moore, Clerk.

Certificate of Time and Place of Marriage.

I, H. M. Spencer, a Minister of the Baptist Church, or religious order of that name, do certify that on the 22nd day of Jan. 1905, at Jefferson Woodard, under authority of the above License, I united in Marriage the persons named and described therein.

Given under my hand this 22nd day of January 1905.

Rev. H. M. Spencer.

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.

Robert Jones
VS

Minnie Jones
Depositions

Filed Oct 14th 1911
NRB

GUY T. HORNER
Attorney and Counsellor at Law
BOYKINS, VIRGINIA

ROBERT JONES

VS -----DEPOSITIONS

MINNIE JONES

Depositions of W. J. Ricks et. als., taken before WILLIAM SHANDS, a Commissioner in Chancery for the Circuit Court of the County of Southampton, Virginia, on the 10th. day of October, 1911, in pursuance of the annexed noticed, and adjournments had thereunder, at Boykins, Southampton County, Virginia, between the hours of ten A. M. and three P.M., to be read in evidence in a certain suit in which Robert Jones is plainuiff and Minnie Jones is defendant, pending, pending in the Circuit Court of Southampton, County, Virginia.

Present: Guy T. Horner, Counsel for the plaintiff, lived and

No counsel for the defendant.

W. J. Ricks, being first duly sworn deposeth and sayeth in answer to interrogatories as follows:

Q 1 State your age, occupation, place of residence and do you know the parties to this suit?

A 1 I am 38 years old, farmer, live about 8 miles from Boykins, Va., and in sight of where the parties lived, and I know both parties well.

Q 2 State if you know when and where the parties were married, and how long they lived together after marriage?

A 2 Married the early part of 1905 in the County of Southampton, Virginia, and lived together until September 1906, and the defendant then willfully deserted the plaintiff, or her husband, and has never lived with him since.

Q 3 State if you know how the plaintiff took care of and treated his wife while she lived with him?

A

A. 3 Robert Jones the plaintiff, is a hard working man and he took care of her while she lived with him, which was in the County of Southampton and when she left him she went to Norfolk or Portsmouth where, so far as I know she now lives, and I know she ^{not} has' lived with him since she left him as I have stated before. Even while she lived with him she conducted herself in a very disreputable manner, having men hanging around her and anything but a proper manner. I hired one of her admirers to work for me, a man by the name of Charles Ryals, and he told me that he had improper relations with her that morning. This was a few months before she left him, her husband. Her husband was not present at the time this remark was made to me and knew nothing of the statement.

Q 4 Where does Robert Jones now live and where did he last live and cohabit as man and wife with Minnie Jones, the defendant.

A.4 He lives in this, Southampton County, and they last lived as man and wife in this, Southampton County.

And further this deponent sayeth not.

SIGNED

H. J. Ricks
mark

Emmett Banks, being first duly sworn deposeth and sayeth in answer to interrogatories as follows:

Q 1 What is your name, age, occupation, place of residence and do you know the parties to this suit?

A 1 My name is Emmett Banks and I live at Branchville, Va. I am 33 years old and am a farmer. I know Robert Jones and Minnie Jones well-I have known them all of my life.

Q 2 Do you know where and when they were married and whether or not they now live together?

Robert Jones is a man who I know and who I have seen and I know the
of Southampton and when she told him she was going to Norfolk of
case of her wife she lived with him until she was in the county
V. 2 Robert Jones the plaintiff is a very working man and he took

A 2 They were married something over six years ago, I believe about
the first of the year 1905, in Southampton County, Virginia. They
do not live together now and have not lived together for over
three years, she deserting him a little over twelve months after
they were married. While they lived together, was in this county.

Q 3 State if you know how the plaintiff, Robert Jones, took care of
and treated the defendant, Minnie Jones, while they lived to-
gether? for the defendant, Minnie Jones, while they were living

A 3 He supported and took care of her as well as any man I ever knew
and did for her all that his means would permit. But she was a
bad woman and had other men than her husband running after her and
did not behave right. She wilfully deserted him and went off to
Norfolk where she now is.

Q 4 Where does Robert Jones now live and where did he live while his
wife lived with him. the place of residence of the plaintiff

A 4 He lives in Southampton County where he was born and raised and
where he has always lived and they last lived together in South-
ampton County. lives here in Southampton County now.

Q 5 Has his wife ever lived with him since she deserted him?

A 5 No sir.

And further this deponent sayeth not.

B. E. Felts
SIGNED

B. E. Felts, being first duly sworn depose and sayeth in answer to
interrogatories as follows:

Q 1 What is your name, age, occupation, place of residence, and do
you know the parties to this suit?

A 1 My name is B. E. Felts, age 41, and I live in Boykins. I am
Constable of Boykins Magisterial District and I know the parties
to this suit.

rules were the governing rule in 1892 over the same matter which
do not have reference now and have not been referred to over
the title of the year 1892 in Southampton County, Virginia. They
V 3 They were married sometime over six years ago. I believe upon

Q 2 State if you know when they were married and where and whether
they are now living together?

A 2 As well as I can recall they were married about the first of the
year 1905. I don't know exactly when she left Robert but I know
that they are not living together now and have not lived together
for several years - certainly not within the last these years.

Q 3 State whether or not the plaintiff, Robert Jones, was a good
provider for the defendant, Minnie Jones, while they were living
together?

A 3 As far as I know he was a good husband. I have been collecting
takes from him for about ten years and I have always regarded him
as being an honest hard working man and so far as I know and have
been able to observe he is a worthy man.

Q 4 State if you know where the parties to this suit last lived as
man and wife, and give the place of residence of the plaintiff
now?

A 4 They last lived together here in the County and Robert Jones,
the plaintiff lives here in Southampton County now.

Further this deponent sayeth not.

BOYKINS
STATE OF VIRGINIA
COUNTY OF SOUTHAMPTON

B. E. Feltz
SIGNED

I, William Shands, a Commissioner in Chancery for the Circuit
Court of the County of Southampton, Virginia, do hereby certify
that the foregoing depositions were duly taken, reduced to
writing, and signed by the witnesses, respectively, before
me, at the place and the times therein mentioned, pursuant
to the annexed notice and adjournments had thereunder. In
witness whereof I have hereunto set my hand and affixed my
official seal at Boykins, aforesaid, this 10th day of Oct.
1911.

W. Shands
Commissioner in Chancery
for the Circuit Court of
the County of Southampton
Virginia.

ROBERT JONES
VS ----- DIVORCE
MINNIE JONES

DECREE

Enter Dec. 16. 1911.
James M. Smoie

ENTERED - C.O.B.

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GUY T. HORNER
Attorney and Counsellor at Law
BOYKINS, VIRGINIA

IN THE CIRCUIT COURT OF THE COUNTY OF SOUTHAMPTON, VIRGINIA.

(DECREE)

ROBERT JONES
VS ----- DIVORCE
MINNIE JONES

THIS DAY this cause came on to be heard upon the bill of the complainant and exhibits therewith filed, and the depositions of the witnesses taken after reasonable notice to the defendant of the time and place of the taking of the same, the defendant upon whom the process was duly served, still failing to appear and plead, answer or demur to the said bill, and was argued by counsel:

ON CONSIDERATION WHEREOF, it appearing that the plaintiff is and has been a resident of the County aforesaid for the past twelve ^{months}, and that the plaintiff and defendant last lived and cohabited as man and wife in the aforesaid County, and that the defendant voluntarilly abandoned the complainant more than three years next preceding the institution of this suit, the court ~~doth~~ adjudge, order and decree that the said marriage heretofore had and solemnized between the plaintiff Robert Jones, and the defendant, Minnie Jones, be, and the same is hereby dissolved and annuled, and that the said Robert Jones be forever divorced a vinculo matrimonii from the said Minnie Jones. And it appearing that nothing further remains to be done in this cause, it is ordered that the same be removed from the docket.