

1933-084 Chancery Causes: Lydia D. Watkins vs Leslie L. Watkins

562

Jds of Wright County

E. H. WILLIAMS
Attorney-at-Law
SMITHFIELD, VIRGINIA

July 30, 1929

Mr. R. A. Edwards, Clerk

Isle of Wight, Va.

Dear Gus:

I am herewith inclosing memorandum in the suit
of Watkins vs. Watkins, together with check for \$7.50,
deposit fee.

Yours truly,

EHW/b

E. H. Williams

Incls.

per-

B.

Hatkins[#]
73 Chaney, 562
Hatkis. ✓

Fild 7-31/29.

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF ISLE OF WIGHT.

Lydia D. Watkins Plaintiff

vs) In Chancery

Leslie L. Watkins..... Defendant

~~H. r~~

Issue summon in chancery to second August
rules, 1929, for said plaintiff against the said
defendant, to answer the said plaintiff a bill in
chancery.

E. H. Williams p. q.

Lydia D. Watkins

vs Lancy #562

Leslie P. Watkins

Filed 7-31-29.

R. A. E.

Dep. with Suit- 750

VIRGINIA: IN THE CIRCUIT COURT OF THE COUNTY OF ISLE OF WIGHT
APRIL 26TH 1933.

Watkins
vs: # 562
Watkins

. It appearing, pursuant to a decree entered herein
on the 6th day of March, 1933, that the parties, or their Counsel,
have been notified by the Clerk of this Court of the terms of
said decree, and no good cause having been shown, it is ordered
that this cause be removed from the docket, with leave to rein-
state the same as provided in Section 6172 of the Code as
Amended.

Watkins

vs } #562

Watkins

March TERM 19.33. Filed

CLK.

VIRGINIA: IN THE CIRCUIT COURT OF THE COUNTY OF ISLE OF WIGHT
MARCH 6th 1933.

Watkins

vs: # 562

Watkins

IT APPEARING that this cause has been on the docket of this Court for more than two years, and that no order has within said period been entered herein, it is therefore ordered, pursuant to the provisions of Section 6172 of the Code of Virginia, as amended, the Clerk of this Court be directed to notify the parties to this cause, if known, or their counsel of record, at his or their last known address, in writing, at least fifteen days before the 25th day of April, 1933, so that on said day all parties named have an opportunity to be heard, and that, except for good cause to then be shown, this cause will be removed from the docket for failure to prosecute the same to a final decree.

Watkins
vs # 562
Watkins.

Cert 9
Page 86.



Commonwealth of Virginia,

To the Sheriff of Isle of Wight County—Greeting:

WE COMMAND YOU, That you summon **Leglie L. Watkins,**

to appear at the Clerk's Office of the Circuit Court of the County of Isle of Wight at the rules
to be holden for the said Court on the Third Monday in August, 1929,
to answer a bill in chancery, exhibited against him
in our said Court by **Lydia D. Watkins,**

And have then and there this writ.

Witness, R. A. EDWARDS, Clerk of our said Court, at the Courthouse, this 31st
day of July, 1929, and in the one hundred fifty fourth year of the
Commonwealth.

R. A. Edwards, Clerk.

Not found in my County
Aug 3rd 1929
W.C. Whitford Sheriff

Lydia D. Watkins,

vs.

CHANCERY NO. 562

Leslie L. Watkins,

ORIGINAL SUBPOENA

Virginia, Clerk's office of the Circuit
Court of the County of Isle of Wight.

....., 19.....

Returned, entered and filed.

Teste:

.....Clerk

To Second August Rules

1929

E. H. Williams, p. q.

Commonwealth of Virginia,

To the Sheriff of Isle of Wight County—Greeting:

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to be holden for the said Court on the Third Monday in August, 1929,
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day of July, 1929, and in the one hundred fifty fourth year of the
Commonwealth.

R. A. Edwards Clerk.

VIRGINIA: IN THE CIRCUIT COURT OF THE COUNTY OF ISLE
OF WIGHT.

Lydia D. Watkins....., Plaintiff

vs: In Chancery

Leslie L. Watkins....., Defendant

TO THE HON. JUDGE OF THE SAID COURT:

Your complainant, Lydia D. Watkins, respectfully represents that, on the 23d day of May, 1918, she was married to the said defendant, in the County of Gates, North Carolina, as will appear by a copy of the marriage license herewith filed, marked "Exhibit A, " and made a part of this bill;

That your complainant was a constant, faithful and dutiful wife to the said defendant;

That the said defendant lived with the said plaintiff in the County of Isle of Wight, until July 15, 1927, at which time the said defendant, without justification, willfully deserted and abandoned your complainant, and such desertion and abandonment has continued from that time until now, and still doth continue.

Your said plaintiff believes, and so charges, that the said defendant is now in Reno, Nevada, for the purpose of obtaining a legal residence, in order to sue your said plaintiff for a divorce in the courts of Nevada.

That of the marriage aforesaid, there was born one child, a boy, William Holmes Watkins, who is now four and one-half years of age, and that your said plaintiff is the most suitable person to have the care and custody of the said infant;

That the said plaintiff has been a resident of the County of Isle of Wight all of her life, and the said defendant has been a resident of the said County of Isle of Wight all of his life, until some three or four months last passed;

That the said plaintiff and the said defendant last cohabited in the said County of Isle of Wight.

in tender consideration whereof, and for as much as your complainant is remediless save in a court of equity, she prays that the said Leslie L. Watkins may be made a party defendant to this bill and be required to answer the same, an answer under oath being hereby expressly waived; that proper process may be issued, that a divorce from bed and board may be decreed your said complainant; that your said plaintiff may be given the care and custody of the said infant; that, both, temporary and permanent alimony, suit money and counsel fees may be awarded to your said plaintiff; that the said defendant may be compelled to pay to the said plaintiff a sufficient sum for the maintenance of the said infant; and,

That your complainant may have all such other, further and general relief as the nature of her case may require or to equity shall seem meet.

And your complainant will ever pray, etc.

E. H. Williams Lydie H. Watkins
P. C. Counsel

Lydie D. Watkins

VS) IN CHANCERY

Leslie L. Watkins

B I L L

E. H. WILLIAMS,
ATTORNEY-AT-LAW,
SMITHFIELD, VIRGINIA