

1919-015
Nansemond Co (Suffolk) Chancery Causes: Lucy Skinner Key vs Willis Key

Skinner, Morris

Lucy Skinner Key.....Complainant.
vs: .. Memorandum.
Willis Key.....Defendant.

To the Clerk of the Circuit Court of
Mansemond County:

Please summon defendant for complainant
to Second February, (1919) Rules, in Chancery.

Hugh J. Holland,
p. q.

Rule Notes:

2-15-19. Process issued returnable to *March* Rules, *Quit* Monday, 1919.

March 3, 1918

*Process returned Executed, bio filed &
Acce tri si.*

CHANCERY SUMMONS

The Commonwealth of Virginia *Lucy Skinner Key of the City of Suffolk, Va*
TO THE SHERIFF OF NANSEMOND COUNTY---GREETING:

You are Hereby Commanded to Summon... Willis Key

to appear at the Clerk's Office of the Circuit Court of Nansemond County, at the Rules to be held
for the said Court, on the First Monday in March 1919, to answer
Bill in Chancery, exhibited against Him
in the said Court by Lucy Skinner Key

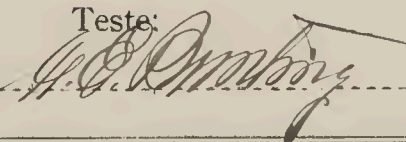
And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this 15th day of
February, 1919, in the 13rd year of the Commonwealth

~~A Copy--Teste:~~

 Clerk

Teste:



Clerk

Executed this 24 day of February, 1915 by delivering a true copy of the with-
in process to Willis Key

in person, in the City of Suffolk County of Nansemond, State of Virginia. A. M. Baker
Sheriff

ORIGINAL

Hugh L. Holland p. q.

Lucy Skinner Key

vs. } In Chancery

Willis Key

1915

February 24 Rules

Third Court Monday.

NANSEMOND COUNTY COURT,

Process Book, No. 3

Page

MARRIAGE LICENSE



"EXHIBIT" - A.

Virginia Hammond 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,

Wells Key
and Ruby Skinner

Given under my hand, as Clerk of the Circuit Court
of Hammond this 24th day of September 1910
W. M. Watkins, Dist. 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 16, 1910.

Time of Marriage, <u>1910 Sept. 25th</u>	Place of Husband's Birth, <u>Gates County, N.C.</u>
Place of Marriage, <u>Suffolk, Va.</u>	Place of Wife's Birth, <u>Hammond Co. Va.</u>
Full Names of Parties Married, <u>Wells Key & Ruby Skinner</u>	Place of Husband's Residence, <u>Suffolk, Va.</u>
Race (white or colored), <u>Colored</u>	Place of Wife's Residence, <u>Suffolk, Va.</u>
Age of Husband, <u>27 years</u>	Names of Husband's Parents, <u>Alfred Key & Barbara, his wife</u>
Age of Wife, <u>25</u>	Names of Wife's Parents, <u>Romney Skinner & Ruby his wife</u>
Condition of Husband, <u>Single</u> Widowed or single or divorced	Occupation of Husband, <u>Barber</u>
Condition of Wife, <u>Widow</u> Widowed or single or divorced	

Given under my hand this 24th day of Sept. 1910
W. M. Watkins, Dist. Clerk

Certificate of Time and Place of Marriage

I, J. D. Jordan, a Minister of the Universalist Church, or religious order of that name, do certify that on the 25th day of Sept. 1910, at Suffolk, Va., under authority of the above License, I united in Marriage the persons named and described therein.

Given under my hand this 25th day of Sept. 1910

Copy: True: J. D. Jordan
The Minister or other person celebrating a marriage is required, within thirty (30) days thereafter, to return the license and certificate of the Clerk and his certificate of the time and place at which the marriage was celebrated to the Clerk who issued the license; failure to comply with these requirements of the law makes the minister or other person celebrating the marriage liable to a fine of not less than ten nor more than twenty dollars for each offense (See Section 2229 of the Code of Virginia, as amended, by Act approved February 16th, 1910, Acts 1910, chapter 28, pages 36 and 37.)

165

Thel's Key
with Marriages
Certificate
Ruey Skinner

1910

Sept. 25

\$100.00

Pg. 3

To Willis Key:

Take notice that on the 13th day of March, 1919, at the office of Hugh L. Holland, in the City of Suffolk, State of Virginia, in the American Bank & Trust Co. Bldg., between the hours of 10 A. M. and 5 P. M. of that day I shall proceed to take the depositions of Jim Sminner and others to be read as evidence in my behalf in a certain suit in equity, depending in the Circuit Court of the County of Nansemond, State of Virginia, wherein I am complainant and you are defendant; and if from any cause the taking of the said depositions be not commenced or commenced, be not concluded on that day, the taking thereof will be adjourned from time to time at the same place and between the same hours until the same shall be completed.

Given under my hand this 15 day of February, 1919.

Willis Key

By

Hugh L. Holland

her attorney.

LUCY KEY.....COMPLAINANT.

VS. NOTICE OF TAKING

DEPOSITIONS.

WILLIS KEY.....DEFENDANT.

"ORIGINAL"

Executed this 24th day of Feb. 1818 by taking a
true copy of the within notice to Willis Key in person
in the City of Suffolk, State of Virginia
A M Baker
Sergeant

The depositions of Randy Skinner, Maria Morris, and Lucy Key, were taken before me, John K. Hutton, a Commissioner in Chancery, for the County of Nansemond, State of Virginia, on the 13th day of March, 1912, between the hours of 10 A. M. and 5 P. M. pursuant to due notice, to the defendant served in person as shown by annexed notice, to be read as evidence on behalf of the complainant in a certain suit in equity pending in the Circuit Court of Nansemond County, wherein Lucy Key is the complainant and Willis Key is defendant.

PRESENT:

Hugh L. Holland, counsel for complainant.

The defendant did not appear either in person or by counsel.

Randy Skinner being duly sworn deposes as follows:

Q. Please state your name, age, residence and occupation.

A. My name is Randy Skinner, I is about 75 years old, I lives in de Nansemond County, Virginia, and I farms.

Q. Please state whether you know Willis Key and Lucy Key, and if so, how long have you known each of them.

A. I been knowing Willis Key nigh onto 15 or 20 years and Lucy Key all her life.

Q. About how far did you live from them when they were living together, near Suffolk, in Nansemond County, Virginia.

A. Well at de time they separated I was living 'bout a half-mile from them and I had been living near them for a good while.

Q. Please state whether they are living together now.

A. Nor sur, they is not.

Q. How long have they been separated.

A. They has been separated very near onto 7 year, they separated sometime in March, 1912.

Q. Which one left the other.

A. He left her, he was no account anyhow.

Q. Have they lived together since that time, as husband and wife

A. Nor sur, they has not.

Q. Please state the circumstances of his leaving and whether he had any cause to leave.

A. Nor sur, he had no cause at all to leave, she done every thing she could, he did not give her nothing, he was a thief and a robber and was no good at all, one time I went over there and he gin her a 50¢ and then tuk it away fum her. He gin what he worked for to other women, he messed with so many that it was hard to tell which one he went wid de most, one morning he reared around, said he was

going 'way and he was not coming back neither, and when he left Lucy Key he went 'way wid another woman, I don't 'member her name, but it was one that I seen him wid a lot, he told Lucy that he were tired of her and wanted somebody younger.

Q. Did Lucy Key Give her husband, Willis Key any cause to leave her.

A. Nor, sur, she did not give him any cause at all to leave, more 'n that she tried to get him not to go 'way and leave her, she tried to get him to stay with her and not mess 'round wid other women, she did all she could to make him behave hisself.

Q. From where you lived would you have known of any cause that she might have given him to leave her.

A. Yas sur, I sho would known if she had gin him any cause to leave her, I lived real near them, I seen them often.

Q. Where does Lucy Key live now.

A. Near Sanders's Station, Hansemond County, Virginia.

Q. Where were Lucy Key and Willis Key living when they last cohabited in the month of March, 1912.

A. They was living near Suffolk, Hansemond County, Virginia.

Q. Where does Willis Key live now.

A. I don't know, but I thinks he lives somewheresin Suffolk.

Q. Were there any children born of this marriage.

A. Nor, sur, they was not.

Q. How long have both Willis Key and Lucy Key lived in the State of Virginia.

A. Ever since their marriage, she have lived in Virginia, all her life, he come from North Carolina sometime, before they was married.

And further this deponent saith not.

Witness:

V. E. Beale

Randy x Skinner

Lucy Key being duly sworn deposes as follows:

Q. Please state your name, age, residence, and occupation.

A. Lucy Key, age 49, I lives in Hansemond County, Virginia, and I works for Mrs. R. S. Holland.

Q. Please state whether you and your husband, Willis Key are living together now.

A. No, sir, we are not.

Q. Which one left the other.

A. He left me, in March, 1912.

Q. Please state the circumstances of his leaving.

A. Well, one morning he jest got ready and left, he was cussing, raring and carrying on something terrille, he said that he was going to leave and that he was not coming back he told me that he did not want me any longer that he could git my betters. He never gin me anything much, some little things, he gin ^{lots} things tother women that he was going 'round wid, he had a heap of women, but there was one that he went ^{wid} more than the others, I seed them often on the road, but I never could find out her name, he would go 'way at night and leave me and stay wid dis woman, when he come back if I said anything to him about it, he would cuss and say that yes he went to see her and talk about killing me, well as I were gwine to say he left me that morning and met her, and they went on off together, and he dint never come back.

Q. What, if anything did he tell you just before he left.

A. He said that he were going 'way for good, that he could find my betters, he were tired of me, and did not want me any more, he wanted a young gal.

Q. Have you and your husband, Willis Key lived together as husband and wife since he left you in March, 1912.

A. No, sir, that we has not.

Q. Were they ever any children by your marriage with Willis Key.

A. No, sir.

And further this deponent saith not.

Lucy Ann Key

Maria Morris being duly sworn deposes as follows:

Q. Please state your name, age, residence, and occupation.

A. My name is Maria Morris, I am 35 years old, I lives in Nansemond County, and my work is housekeeper for my husband.

Q. Please state whether you know Willis Key and Lucy Key and if so, how long you have known each of them.

A. Well, I been knowing Willis Key about 8 years and I been knowing Lucy Key all of my life, I have lived close to her all the time.

Q. About how far did you live from Lucy Key and Willis Key, her husband when they were living together in Nansemond County, Virginia.

A. I lived real close to them, I guess it was 'bout half-mile and I seen them real often, I went to see them and some times they would visit with me, we was close neighbors.

Q. Please state how well you knew them.

A. I knew them well, I was over there real often, I seen them several times a week and they would come over to see me.

Q. Please state whether they are living together now.

A. No, sir, they are not.

Q. How long have they been separated.

A. They has been separated about 7 years, he left her in March, 1912.

Q. Which one left the other.

A. He left her.

Q. Please state the circumstances of his leaving and whether he had any cause to leave his wife, Lucy Key.

A. He did not have no cause to leave, I know that, he were just a mean man and no account, one morning he left, sometime before he left I heard him tell her that he were

going to leave her, and git her betters, to live wid him, and he were not coming back to her neither, she were too old for him and that he was jest natually tired of her. She did not gin him any cause at all to leave her, she done every thing she could for him, and made him a good wife, she done a heap more'n I woulder done, no, sir she did not gin him any cause to leave her, he jest tuk up and went off wid another woman, he was carrying on wid;

- Q. Where does Willis Key live now.
- A. I hears that he stays 'round Suffolk most of his time.
- Q. Where were Willis Key and his wife, Lucy Key living when they last cohabited or lived together as husband and wife.
- A. Near Suffolk, Mansmond County, Virginia.
- Q. Where does Lucy Key live now.
- A. Near Sander's Station, in Mansmond County, Virginia.
- Q. How long have Lucy Key and Willis Key lived in the State of Virginia.
- A. She have lived in Virginia ever since she was born and Willis Key has been here in Virginia, a good while, he come here before they was married, he come here from North Carolina.

and further this deponent saith not.

Maria Morris

STATE OF VIRGINIA, COUNTY OF HANSEMOND-----TO-WIT:

I, John K. Hutton, a Commissioner in Chancery for the County of Hansemond, State of Virginia, do certify that the foregoing depositions of Randy Skinner, Maria Morris, and Lucy Key, were duly taken, sworn to, and subscribed before me at the office of Hugh L. Holland, in the City of Suffolk, State of Virginia, on the 13th day of March, 1919, between the hours of 10 A. M. and 5 P. M. to be read as evidence on behalf of the complainant in a certain suit in equity depending in the said court wherein Lucy Key is complainant and Willis Key is defendant.

Given under my hand this 13th day of March 1919.

John K. Hutton
COMMISSIONER IN CHANCERY FOR THE

COUNTY OF HANSEMOND, STATE OF VIRGINIA.

LUCKE KEY....COMPLAINANT.

VS. DEPOSITIONS.

WILLIS KEY....DEFENDANT.

LUCY KEY

.....COMPLAINANT.

vs.

DECREE.

WILLIS KEY

.....DEFENDANT.

This cause came on this day to be heard on the Bill of Complaint and the depositions of witnesses taken after due and legal notice to the defendant, as required by law, and the defendant, who appears to have been proceeded against in the manner prescribed by law, failing to plead, answer, or demur and was argued by counsel.

On consideration whereof it appearing to the Court from the evidence taken and submitted in this cause that the said defendant, Willis Key, since his marriage with the plaintiff, has deserted her for a period of more than three years, that the plaintiff is a resident of the County of Nansemond, and has been domiciled in the State of Virginia, for more than twelve months next preceding the commencement of this suit, and that the plaintiff and defendant last cohabited in the County of Nansemond, the Court doth adjudge, order, and decree that the said plaintiff be, and she is hereby granted a divorce a vinculo matrimonii, from the said defendant, and that the marriage heretofore solemnized be, and the same is, hereby annulled and set aside, and it appearing that nothing further remains to be done in this cause, it is ordered to be stricken from the docket.

LUCY KEY ...COMPLAINANT.

VS. DECREE.

WILLIS KEY ...DEFENDANT.

*Enter May 12 1919.
Jas. S. McMore,*

*Chmery Order Book No. 5-
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HUGH L. HOLLAND
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

HUGH L. HOLLAND
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

Feb. 26th, 1919.

Mr. Geo. E. Bunting, Clerk,
Suffolk, Va.

Dear Sir :-

IN RE: LUCY SKINNER KEY VS. WILLIS KEY.

I enclose you Bill of Complaint in the
above styled chancery suit which I will thank you to file for
me.

Yours very truly,

Hugh L. Holland

LUCY SKINNER KEY.....COMPLAINANT.

VS. BILL.....

WILLIS KEY.....DEFENDANT.

To the Honorable Circuit Court of Nansemond
County:

Your complainant, Lucy Skinner Key, respectfully
represents:

(1) That on the 25th day of September, 1910,
your complainant, whose maiden name was Lucy Skinner, was
lawfully married at Suffolk, in the County of Nansemond,
Virginia, to Willis Key, as will appear from a certificate
of marriage herewith filed, marked "EXHIBIT A", and made a
part of this bill; and,

(2) That continuously from the date of said
marriage until the _____ day of March, 1912, your
complainant and the said Willis Key lived together as
husband and wife in Nansemond Co. near the City of Suffolk,
in the State of Virginia; and,

(3) That the said Willis Key has wilfully deserted
and abandoned your complainant for a period of more than
three years: That is to say, on the _____ day of March,
1912, the said Willis Key did, voluntarily, wilfully and
without any justification whatever, leave his home; that
immediately before leaving he stated to your complainant
that he was going to leave her forever and that he would
never return to her; and,

(4) That your complainant has resided and has

been domiciled in this state ever since the aforesaid marriage, and for more than one year next preceding the commencement of this suit, and is domiciled and now resides in this state; and,

Key

(5) That your complainant last cohabited with the said Willis, in the County of Hansemond, in the State of Virginia:

In consideration whereof, and forasmuch as your complainant is remediless in the premises save in a court of equity, your complainant prays that the said Willis Key may be made a party defendant to this bill, and required, but not on oath, to answer the same, the oath being hereby waived; that proper process may be issued; that a divorce from the bond of matrimony which was created by the aforesaid marriage be decreed her; and that your complainant may have all such further, and other, and general relief in the premises as the nature of her case may require, or to equity shall seem meet.

Jucy Key
By Hugh G. Holland
Verally
Complainant.

Hugh G. Holland,

Counsel.

LUCY SKINNER KEY
.....COMPLAINANT.

VS. BIRD....

WILLIS KEY....

DEFENDANT.

Filed Mar. 3, 1919
G. E. Rimbey
P. Clerk

Hugh R. Holland, Jr.

Suey Skinner May

18
Helen May

Dora L. L. L.

May 1919

May 22-51

Reprint 2-18-59: #250