

1932-001
Nansemond Co (Suffolk) Chancery Causes: Martha R. Amos vs John A. Amos

Rountree, Hunter, Mann

**VIRGINIA: IN THE CIRCUIT COURT
OF NANSEMOND COUNTY**

Martha E. Amos Complainant
v.

John A. Amos Defendant

The object of the above styled suit is to obtain a divorce from the bonds of matrimony on the grounds of cruelty and desertion.

And it appcaring by affidavit filed according to law that John A. Amos, the above-named defendant, is not a resident of this State, it is therefore ordered that the said John A. Amos do appear within ten (10) days after due publication of this order, in the Clerk's Office of our said Circuit Court, and do whatever is necessary to protect his interest.

And it is further ordered that this order be published once a week for four successive weeks in the Suffolk News-Herald, a newspaper published in the City of Suffolk, Virginia, and no newspaper being prescribed by our Circuit Court, the said newspaper is hereby ordered to publish the same.

And it is further ordered that a copy of this order be posted on the front door of the court house of the Circuit Court of Nansemond County, Virginia, on or before the next succeeding rule day, and that a copy of the order be mailed the non-resident defendant at his last known post-office address, which is given in the affidavit.

Teste: A True Copy:

JOHN H. POWELL,

Clerk.

E. Roland Custis, p.q.
mar.5,12,19,26.

THE SUFFOLK NEWS-HERALD

PUBLISHED BY
THE SUFFOLK NEWS COMPANY, INCORPORATED

SUFFOLK, VA.

H. STUART LEWIS, PRESIDENT
H. P. GUERRANT, GENERAL MANAGER
C. J. RIDDICK, JR., BUSINESS MANAGER
W. C. JOHNSTON, EDITOR

March 28, 1932.

This is to certify that the attached order of publication in the suit of Marth R. Amos against John A. Amos, was duly published in the Suffolk News-herald once a week for four successive weeks; namely March 5th, 12th, 19th, and 26th, 1932.

Suffolk News Company, Inc.,

By *C. J. Riddick, Jr.*

WHICH ROGERS REPORTED AND THE OTHERS
censors are not guilty of all the exag-
geration; that the foreign correspon-
dents have been doing their share. He
suggests discounting the reports by 50
per cent.
Doesn't the humorist also exaggerate?
At least he is not quite accurate. It
is true that the official bulletins from
the two war camps are doctored up for
home and foreign consumption, but
most of the war news published in the
United States is obtained at the front
by unbiased war correspondents and
cabled from the international settle-
ment where there is no press censor-
ship and therefore no cause for inac-
curacy.
Rogers probably intended no indict-
ment of the foreign war correspondents
in the Far East. When he said they
exaggerate he made an unfortunate
choice of words. What he meant was

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

MARTHA R. AMOS COMPLAINANT

v.

JOHN A. AMOS DEFENDANT

The object of the above styled suit is to obtain a divorce from the bonds of matrimony on the grounds of cruelty and desertion.

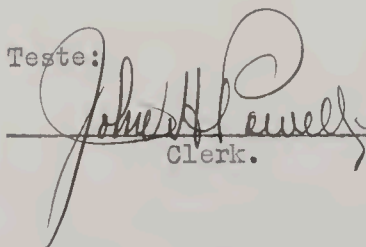
And it appearing by affidavit filed according to law that John A. Amos, the above named defendant, is not a resident of this State, it is therefore ordered that the said John A. Amos do appear within ten (10) days after due publication of this order, in the Clerk's Office of our said Circuit Court, and do whatever is necessary to protect his interest.

And it is further ordered that this order be published once a week for four successive weeks in the Suffolk News-Herald, a newspaper published in the City of Suffolk, Virginia, and no newspaper being prescribed by our Circuit Court, the said newspaper is hereby ordered to publish the same.

And it is further ordered that a copy of this order be posted on the front door of the Court House of the Circuit Court of Nansemond County, Virginia, on or before the next succeeding rule day, and that a copy of the order be mailed the non-resident defendant at his last known post-office address, which is given in the affidavit.

E. Roland Custis, p. q.

Teste:


Clerk.

3.

VIRGINIA:

IN THE CIRCUIT COURT
OF HANSMOND COUNTY.

MARTHA R. AMOS

v.

JOHN A. AMOS

Filed: *March 5, 1932*
John H. Amos - Clerk

VIRGINIA:

IN THE CIRCUIT COURT OF NANSIMOND COUNTY

MARTHA R. AMOS.....COMPLAINANT

vs.

JOHN A. AMOS.....DEFENDANT

STATE OF VIRGINIA,
CITY OF SUFFOLK, to-wit:

This day, Martha R. Amos, the above named complainant, personally appeared before me, Minnie Lavine, a Notary Public in and for the City and State aforesaid, in my city, and made oath that John A. Amos, the above named defendant, is not a resident of the State of Virginia, and that his last known postoffice address is Lennox, Maryland.

Given under my hand this 4th day of March, 1932.

Minnie Lavine
Notary Public.

2.
VIRGINIA: IN THE CIRCUIT COURT
OF NANSEMOND COUNTY.

MARTHA R. AMOS

vs.

JOHN A AMOS

AFFIDAVIT

Filed this 5th day of March, 1932.

John A. Wallace
Clerk.

VIRGINIA:

In the Clerk's Office of the Circuit Court of the County of Nansemond.

Martha P. Lewis Pltff. }
vs. } In Chancery
John D. Lewis Df't }

I hereby certify that on the 5th day of March 1932

I posted a copy of the order of publication entered herein, at the front door of the Courthouse of the County of Nansemond; that being on or before the next succeeding rule day after said order was entered, and I further certify that I have mailed a copy of same to the last known address of the defendant.

Given under my hand this 5th day of March 1932

John H. Lewis, Clerk.

By _____, Deputy Clerk.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

MARTHA R. AMOS.....COMPLAINANT

v.

✓ JOHN A. AMOS.....DEFENDANT

To John H. Powell, Clerk:

Please issue summons in the above cause
returnable the first March kules, 1932.

E. Roland Austin
Counsel

I,

VIRGINIA:

IN THE CIRCUIT

COURT OF HANSEMOND COUNTY

MARTHA R. AMOS

v.

JOHN A. AMOS

*Filed March 5, 1932
John B. Powell - Clerk*

The Commonwealth of Virginia,

To the Sheriff of the County of Nansemond, Greeting:

WE COMMAND YOU, That you summon John A. Amos

to appear at the Clerk's office of the Circuit Court of the County of Nansemond
at the rules to be held for the said Court on the first Monday in March, 19 32,
to answer a bill in chancery, exhibited against him in our said Court by
Martha R. Amos

And have then there this writ. Witness John H. Powell, Clerk of our said
Court, at the court-house, the 5th day of March, 19 32, and in the
156th year of the Commonwealth.

John H. Powell, Clerk
By Evelyn Harris, D.C.

Original

Form No. 300

Martha R. Ames

vs.

}

SUBPOENA IN CHANCERY

John A. Ames

, p.q.

To.....Rules,

.....Circuit Court.

Not found in my
County of Mansfield
E. B. Rawls
Shuff

The Commonwealth of Virginia,

To the Sheriff of the County of Nansemond, Greeting:

WE COMMAND YOU, That you summon John A. Amos

to appear at the Clerk's office of the Circuit Court of the County of Nansemond
at the rules to be held for the said Court on the first Monday in March, 1932,
to answer a bill in chancery, exhibited against him in our said Court by
Martha R. Amos

And have then there this writ. Witness John H. Powell, Clerk of our said
Court, at the court-house, the 5th day of March, 1932, and in the
156th year of the Commonwealth.

John H. Powell, Clerk
By Evelyn Harris, D.C.

Copy: —

Form No. 300

John A. Amos

vs.

}

SUBPOENA IN CHANCERY

....., p.q.

To.....Rules,

.....Circuit Court.

Not found

E. B. Hawley
Shaffer

No. 125755

MARRIAGE LICENSE

To Rev. H. M. Hennig, authorized to celebrate marriages in the
District of Columbia, Greeting:

You are hereby authorized to celebrate the rites of marriage between
John A. Amos, of Guena Mills Va
Martha I. Rountree, of Cypress Chapel Va.
and having done so, you are commanded to make return of the same to the Clerk's Office
of the Supreme Court of said District within TEN days, under a penalty of fifty dollars
for default therein.

Witness my hand and seal of said Court this 20th

day of Dec, Anno Domini 1924

By Margan W. Beach Clerk.
J. W. A. Krall Assistant Clerk.

No. 125755

RETURN

I, Rev. H. M. Hennig, who have been duly
authorized to celebrate the rites of marriage in the District of Columbia, do hereby certify
that, by authority of license of corresponding number herewith, I solemnized the marriage of

John A. Amos and Martha I. Rountree
named therein, on the 20th day of Dec, 1924,
at Washington, in said District.

H. M. Hennig
Address: _____

Clerk's Office, Supreme Court of the District of Columbia

I, FRANK E. CUNNINGHAM, Clerk of the Supreme Court of the District of
Columbia, hereby certify that the foregoing License and Certificate of Marriage are truly
copied from Originals of Record on file in said Office.

Witness my hand and the seal of said Court, the

23rd day of February, 1932.

FRANK E. CUNNINGHAM, Clerk.

By Maud R. Ryner Assistant Clerk.

District of Columbia, to wit:

Jennings Bailey, Senior Asso.

I, ALFRED A. WHEAT, Chief Justice of the Supreme Court of the District of
Columbia, do certify that the foregoing attestation by FRANK E. CUNNINGHAM, Clerk
of the said Court, is in due form.

Witness my hand and seal, this 23rd day of February, 1932.

Jennings Bailey
Senior Associate

Alfred A. Wheat
Chief Justice.



"Exhibit A"

VIRGINIA:

IN THE CIRCUIT COURT OF THE COUNTY OF NANSEMOND.

MARTHA R. AMOS.....COMPLAINANT)

vs.

) DEPOSITIONS

JOHN A. AMOS.....DEFENDANT)

Depositions of Mrs. Martha R. Amos, A. J. Rountree, Dr. H. H. Hunter, Mrs. C. W. Rountree and Mrs. G. C. Mann, taken before me, William S. Holland, Commissioner in Chancery for the Circuit Court of the County of Nansemond, Virginia, on the 19th day of April, 1932, at the office of E. R. Custis, Esquire, Room 307 National Bank of Suffolk Building, Suffolk, Virginia, between the hours of ten o'clock in the forenoon and four o'clock in the afternoon of said day, to be read in evidence in a further proceeding in the above entitled cause, pending in said Circuit Court.

Appearances:

For the complainant:

E. R. Custis, Esquire, of counsel.

For the defendant:

No appearance.

MRS. MARTHA R. AMOS, being first duly sworn, deposes and says as follows:
(Examined by E. R. Custis)

Q. Please state your name?

A. Martha Rountree Amos.

Q. Please state the date of your marriage to John A. Amos?

A. December ~~20~~ 1924.

Q. How long did you live with John A. Amos as his wife?

A. Until October, 1927.

Q. Where did you live during that time?

A. I lived about a year and a half in Guinea Mills, Cumberland County, Virginia, and the rest of the time in Washington, D. C.

Q. Was there a child born out of this wedlock?

A. Yes, May 24, 1927.

Q. What is the name of this child?

A. Ralph Allen Amos.

Q. During the time you lived with John A. Amos, as his wife, please state the conditions as to his support of you?

A. Well, he didn't contribute anything to my support until we did go to Washington. I taught school from the time we were married until the time we went there, and not only supported myself but supported him. After we went to Washington, I worked at the Hecht Company and continued to support myself. He paid the rent sometimes, but wouldn't contribute always toward the groceries. At times I bought them myself. He didn't contribute anything towards the birth of my child.

Q. Mrs. Amos, before your child was born, did your husband make any arrangement for medical attention?

A. No, I had medical attention, but I paid the doctor's bill myself.

Q. And it was necessary for you to come to your parents' home?

A. Well, I knew I would have to because I didn't have funds to finance it myself.

Q. How did you get the money to come to your parents' home?

A. I had enough to come on. At various times my parents had given me small sums of money, and I knew this was coming forward and I had saved as much as I could towards it.

Q. Where was your child born?

A. At my father's home - Cypress Chapel, Virginia.

Q. Who attended you?

A. Dr. H. H. Hunter from Whaleyville.

Q. Was your husband present at the time your child was born?

A. No.

Q. Mrs. Amos, was your husband notified at the time your child was born?

A. Yes, Dr. Hunter wired him.

Q. How long was it before he came and visited you?

A. He came when the child was four weeks old and stayed two days.

Q. Were you very sick during this time?

A. Yes, I was very sick and had several setbacks and was very slow mending. And my husband was notified of my condition by letters from my family, and at the time he did come, Dr. Hunter talked to him about my condition at that time.

Q. When he came to see you, did he make any arrangements at that time with Dr. Hunter towards payment of his bill?

A. Dr. Hunter presented him the bill at that time and he told him he would pay it but never did.

Q. Did your husband visit you again at Cypress Chapel?

A. No.

Q. Who paid Dr. Hunter's bill?

A. My father.

Q. To your knowledge, do you know if Dr. Hunter made any attempt to get the bill paid by your husband?

A. He tried for over a year before my father paid the bill.

Q. And was never able to get anything whatsoever?

A. No, he never replied to any statement.

Q. Did you return to your husband after the child was born?

A. Yes.

Q. And how long did you remain with him in Washington?

A. Two and a half months.

Q. Please state what were the living conditions at your home during that time?

A. Well, the majority of the time there was no food in the house. If I asked him for any money, there was just a row. He would go days without giving me any funds for groceries or household expenses, and sometimes when he left for work I would tell him there wasn't any food whatsoever and I didn't have a cent, and he would go without leaving any. And he would come home and because a balanced meal wasn't prepared, he would curse and make a big row. When he was at home he was very abusive.

Q.

Q. Was there sufficient food for your child during that time?

A. Well, my child was a nursing baby, but there was not food enough for me. After I would write my mother about conditions, she would send me the money for food. His cousin lived in the same apartment and frequently knew that I didn't have enough food and would bring me a tray and have me to meals.

Q. Was your husband working at this time?

A. Yes, every day.

Q. Mrs. Amos, you stated that your husband was often abusive to you. Please state just what you mean by that?

A. Well, when he came home he thought I should have the baby asleep. If he was just awake - didn't have to cry - he would make a row over that. He thought he should have him out of the way when he came in. He never paid any attention to the baby; he ignored him entirely. And after I returned to Washington with the baby, his attitude and conduct continually grew worse. Before the child was born, I was working and went ahead and bought the necessary food for the house, but after the child was born I was unable to work and then he grew intensely bitter and cruel in his attitude to both myself and my child. He wanted me to wean the baby and have some one take care of him and go back to work. The child was a breast fed baby and my husband insisted that I wean the baby and go back to work and again support myself and child. This I was unable to do because of my physical condition and because the child was not getting sufficient nourishment due to the fact that I was not having the necessary food, and my husband was making an ample salary to properly take care of all of us. He was continually running around all night. He didn't come in until two, three, four and even five in the morning. He was spending his money on gambling and on women unknown to me. I was left in the house alone with my infant child in a strange city without friends or relatives on whom I could depend for support. The conditions continued to grow worse until they became such that I was absolutely necessary for me to secure aid from my family and then to return to their home, as I knew that the child could not grow and continue to be healthy, nor could I continue to live on the small amount of food occasionally furnished by my husband. It was absolutely imperative that I look to my family for assistance and I was compelled to go to their home.

Q. What was he doing away from home at night?

A. He was gambling some I knew that, and sometimes he was with women. In fact I found addresses in his pockets, and saw him with one one day. Nearly rubbed elbows with her, and he told me it was some one else I saw - never owned up it was he.

Q. Then during the entire period of your marriage your husband failed entirely to support you?

A. Yes.

Q. And after your child was born and you returned to Washington, he continued to fail to furnish you with the necessary food?

A. Yes.

Q. And was spending his money gambling and on women unknown to you?

A. Yes, he spent it somewhere. I never knew where it went, and I didn't have any.

Q. Did you say he often remained away from home all during the night?

A. Yes, I didn't know where he was during those times.

Q. And that whenever he was at home he was abusive and cruel to you?

A. Yes.

Q. Was it possible for you to remain with your child at your husband's home, Mrs. Amos?

A. Not unless my husband supported me.

Q. And then only to suffer constant abuse?

A. Yes, sir.

Q. When did you return to your father's home?

A. In October, 1927.

Q. Were you willing to return to your husband's home if he would make proper arrangements to take care of you and your child?

A. Yes, I wrote him that I would go back, and asked him to send money for my railroad fare, as he knew I had no funds of my own and was not in a position to get any. But he never answered my letter, just ignored it entirely, and has never made any arrangements for my return from that day to this.

Q. Since October, 1927, has your husband ever contributed anything toward the support of either yourself or your child?

A. No.

Q. How has your child been supported up to this time?

A. I have clothed him and my father and mother have fed him.

Q. He has remained with your father and mother?

A. Yes.

Q. What have you been doing in this time?

A. I went in training in 1928.

Q. What training?

A. In training at Lakeview Hospital for nurse. I graduated last September, 1931.

Q. Why did you enter training, Mrs. Amos?

A. I felt it was my duty to earn my own support and help to take care of the child without all the responsibility on my parents.

Q. You mentioned early in your testimony that you taught school before you were married. Why did you not return as a teacher?

A. I never cared for teaching for one thing, and it is exceedingly difficult for married women to obtain positions as teachers in the State of Virginia is another reason.

Q. You stated that your husband has never furnished any support for either you or your child since October, 1927?

A. No.

Q. And that it was impossible for you to remain in your home in Washington because of his lack of support and because of his cruelty?

A. Yes.

Q. And that had you not returned to your parents' home, probably both you and your child would have been almost destitute and without support?

A. We would have been.

Q. How old was your child at that time?

A. It was four and a half months old when I came back.

Q. Where did you last cohabit with your husband, John A. Amos?

A. In Washington, D. C.

Q. And that was before October, 1927?

A. Yes, July, 1927.

Q. Has your husband been working during the time and since you were forced to leave your home?

A. Yes, constantly.

Q. If possible, do you wish to secure support for your child from your husband?

A. I would like to. He has always had a position and has been able to furnish support for his child, and I feel that since he never has supported the child he should be made to.

Q. Where are you now living, Mrs. Amos?

A. I live with my father at Cypress Chapel, Virginia, except when I am working.

Q. And your child remains there all the time?

A. Yes.

Q. You have lived there since October, 1927.

A. Yes, except when I was in training.

Q. Your home has been in Nansemond County Ever since you have returned from Washington?

A. Yes.

Q. What is your age?

A. I am twenty-seven.

Q. During the time you lived with your husband, what was your attitude towards him?

A. I did the best I could to make a home. I tried to talk to him and get some understanding about the way he was doing and come to some agreement, but he always grew angry every time anything was said. It was impossible to get any understanding between him at all.

Q. And you were compelled to leave his home in order to get support?

A. Yes.

Q. Do you know the amount of salary your husband was drawing?

A. He averaged about \$6.00 a day.

Q. What sum do you think would be fair to pay as support for the child?

A. I would rather leave that to the Court.

Q. Do you ask the Court to give you the custody of your infant son?

A. Yes.

Q.

And further this deponent saith not.

Martha R. Amos

MR..A. J. ROUNTREE, being first duly sworn, deposes and says as follows:

Q. What are your initials, Mr. Rountree?

A. A. J. Rountree.

Q. Where do you live?

A. Cypress Chapel, Virginia.

Q. Are you the father of Martha Rountree Amos?

A. Yes, sir.

Q. How long has she been living with you since she was married?

A. Around five years.

Q. Do you know the conditions of her home during the time she lived with John A. Amos?

A. Well, I don't think there was anything much to what she was used to. I know she worked, taught school, supported her own self and him to.

Q. Do you know where they lived when they were first married?

A. On the Nelson Page farm in Cumberland County, Virginia.

Q. And where did they later live?

A. Washington, D. C.

Q. Was there a child born out of this marriage?

A. Yes.

Q. What is this child's name?

A. His name is Ralph Amos.

- Q. And do you know when this child was born?
- A. It was the 24th of May, 1927.
- Q. Where was the child born?
- A. At my home.
- Q. Do you know why the child was born in your home instead of in Washington?
- A. Because the mother did not feel that she would have the proper attention in Washington and came home.
- Q. Why didn't she have the proper attention?
- A. Because he didn't properly support her and did not give her any money or make any arrangements for medical attention.
- Q. Her husband was working at this time?
- A. Yes, he was a bus operator for the Washington Railway & Power Company and making a good salary.
- Q. Who treated Mrs. Amos at her childbirth?
- A. Dr. H. H. Hunter of Whaleyville.
- Q. Who paid him for his services in this matter?
- A. I did myself.
- Q. Was there any attempt made to get Mr. Amos to pay his bill?
- A. Yes, repeatedly by Dr. Hunter, myself, and Mrs. Amos as well. We tried for over a year but were never able to get any reply to our letters.
- Q. Did Mr. Amos visit Mrs. Amos during her sickness?

- A. He came one time when the baby was about four weeks old. He came one day and went back the next day, and never came again.
- Q. Has he ever been to your home since?
- A. No. We have invited him a number of times to come, but he never came.
- Q. Was Mrs. Amos very sick at this time?
- A. Yes, she was critically ill and had a very difficult time.
- Q. After she had partly recovered from her illness, she returned to Washington, did she not?
- A. She did. She stayed about three months.
- Q. Do you know the conditions under which she left while in Washington at this time?
- A. He neither supported her nor the child, or furnished the necessary supplies, and it was necessary for us to help her out by sending money to her.
- Q. How long did she remain in Washington at this time?
- A. About two or three months.
- Q. Do you know how she was able to return to your home?
- A. She used the money we had sent her.
- Q. What was her condition financially when she returned to your home?
- A. She didn't have a thing. I don't believe she brought home a nickle.
- Q. And she and her child have lived with you since that time?
- A. Yes, sir.

Q. Who has supported her and the child since that time?

A. We have supported her and the child, with the exception of the three years she was in training. We have supported the child all the time.

Q. Has her husband during this time ever assisted in her support or the support of the child?

A. Not one penny.

Q. When did Mrs. Amos graduate as a nurse?

A. She graduated in June¹⁹³¹ at Lakeview Hospital, Suffolk, Virginia, and completed her training as a graduate nurse in Richmond in September, 1931.

Q. And it has only been since September that she has been in a position to support herself and child?

A. That is right.

Q. What was Mrs. Amos' physical condition when she came home?

A. She was very nervous and run down physically.

Q. To your knowledge, do you know whether or not Mrs. Amos has tried to effect a reconciliation with her husband?

A. Yes she has. She has written him that if he would reform and treat her as a wife she would go back to him, but he has failed to reply.

And further this deponent saith not.

A. J. Rountree

DR. H. H. HUNTER, being duly sworn, deposes and says as follows:
(Examined by E. R. Custis)

Q. What is your name, and your residence?

A. Dr. H. H. Hunter, Whaleyville, Virginia.

Q. Did you treat Mrs. Martha R. Amos at the time of her childbirth?

A. Yes, sir.

Q. Will you please state the condition of Mrs. Amos during her illness?

A. I attended Mrs. Amos in May, 1927, for childbirth. She had a pretty tedious case. It was harder than the average normal case.

Q. Did her husband visit her during her sickness, to your knowledge?

A. No, he was not there at that time. He came later for a short while.

Q. Did he make any arrangement with you in regard to the payment of your bill?

A. Yes, he promised to pay it.

Q. Did he ever pay it?

A. No, sir.

Q. Did you try to secure payment from him?

A. Yes, sir, I sent him several statements but never heard anything from him.

Q. Who paid this bill?

A. Mr. Rountree.

Q. You mean the father of Mrs. Amos.

A. Yes.

Q. Did you notify Mr. Amos at the time his child was born?

A. Yes, I wired him at Washington. He did not come down here until four weeks later, and only stayed a day or two, and never came again.

And further this deponent saith not.

H. H. Hunter In D.

MRS. C. W. ROUNTREE, being duly sworn, deposes and says as follows:
(Examined by E. R. Custis)

Q. Please state your name.?

A. Mrs. C. W. Rountree.

Q. Where do you live, Mrs. Rountree?

A. At Cypress Chapel, Virginia.

Q. Mrs. Rountree, do you know Mrs. Martha R. Amos?

A. Yes, sir.

Q. Do you know her husband?

A. I have seen him.

Q. Do you know about the time she has been staying at her parents' home?

A. Yes, since October, 1927.

Q. To your knowledge, up to this time, has her husband visited her?

A. No.

Q. Has he furnished any support for either her or her child?

A. I don't think so. If he has, I never heard of it.

Q. During this time, what has Mrs. Amos been doing in order to secure support?

A. Well, she took a course in nursing and has been nursing.

Q. And where is her child?

A. At her father's home.

Q. How has he been supported?

A. He has been supported by her and her parents together.

And further this deponent saith not.

Miss. C. W. Rountree

MRS. G. C. MANN, being duly sworn, deposes and says as follows:
(Examined by E. R. Custis)

Q. Please state your name?

A. Mrs. G. C. Mann.

Q. Do you know Mrs. Martha R. Amos?

A. Yes.

Q. How long have you known her?

A. About eight years.

Q. Do you know approximately the time she returned from Washington, D. C.?

A. It was in October, 1927.

Q. Has her husband ever visited her during this time?

A. No.

Q. How has she been able to secure support for herself and her child during this time?

A. Well, she has completed her nurse's course and has been nursing since that time.

Q. Where has the child lived during this time?

A. At her parents' home.

Q. To your knowledge, has Mrs. Amos received any support from her husband during this time?

A. I don't think so.

And further this deponent saith not.

Mrs. G. C. Mann

STATE OF VIRGINIA,
CITY OF SUFFOLK,
COUNTY OF NANSEMOND, to-wit:

I, William S. Holland, a Commissioner in Chancery
for the Circuit Court of the County of Nansemond, Virginia, do hereby
certify that the foregoing depositions were duly taken, reduced to
writing and signed before me, in my immediate presence, at the time
and place in the caption mentioned.

In witness whereof, I have hereunto set my hand at
the City of Suffolk, Virginia, this 23rd day of April, 1932.

William S. Holland
Commissioner in Chancery

VIRGINIA: IN THE CIRCUIT COURT
OF NANSEMOND COUNTY

MARTHA R. AMOS

vs.

JOHN A. AMOS

DEPOSITIONS

Filed this 25th day of April,
1932. J. L. M.

E. ROLAND CUSTIS
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

MARTHA R. AMOS.....COMPLAINANT

vs.

JOHN A. AMOS.....DEFENDANT

This cause came on this day to be heard on the complainant's bill and exhibit; the defendant, having been regularly proceeded against by order of publication, and having failed to appear, plead, answer or demurrer; and upon the depositions on behalf of complainant taken and filed in the cause, and was argued by counsel.

Upon consideration whereof and it appearing to the court independently of the admissions of either party in the pleadings or otherwise, that the defendant, John A. Amos, has without just cause, deserted and abandoned the complainant for a period of more than three (3) years, as alleged in the bill in this cause and that the complainant, Martha R. Amos, is entitled to the relief prayed for in her said bill. It is therefore, adjudged, ordered and decreed that the complainant, Martha R. Amos, and defendant, John A. Amos, be, and they are hereby, divorced from each other from the bonds of matrimony, but neither of the aforesaid parties shall remarry within six (6) months from the entering of this decree; and the court doth further adjudge, order and decree that the care and custody of Ralph Allen Amos, the infant child of the said Martha R. Amos and John A. Amos, be awarded to the said Martha R. Amos with whom he shall remain.

And nothing further remaining to be done in this cause it is further ordered that the same be removed from the docket.

VIRGINIA: IN THE CIRCUIT COURT
OF NANSEIMOND COUNTY.

MARTHA R. AMOS

vs.

JOHN A. AMOS

D E C R E E

Entered this 25th day of April,
1932.

Les S. Moore
Judge.

Chancery Order
Book 6: Page 492

VIRGINIA:

IN THE CIRCUIT COURT OF NANSIMOND COUNTY

MARTHA R. AMOS.....COMPLAINANT

v.

JOHN A. AMOS.....DEFENDANT

TO THE HONORABLE JAMES L. McLEMORE, JUDGE:

Your complainant, Martha R. Amos, respectfully represents:

(1) That on the 20th day of December, 1924, your complainant, whose maiden name was Martha I. Hountree, was lawfully married at Washington, in the District of Columbia, to John A. Amos, 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 October, 1927, your complainant and the said John A. Amos lived together as man and wife at Guinea Mills, Virginia, and Washington, District of Columbia; and,

(3) That during the time she so lived with the said defendant, she always conducted herself towards him with kindness and as a true and loving wife; and,

(4) That the following child was born to your complainant and the said defendant, Ralph Allen Amos, born the 24th day of May, 1927, and is now in the possession of your complainant; and,

(5) That on the day of October, 1927, your complainant was compelled to leave and cease living with the defendant, in consequence of his continued ill-treatment, cruelty and neglect, hereinafter mentioned.

And your complainant further represents that the said John A. Amos, not regarding his marriage relationship and duties, has in the said

inter-marriage been guilty of extreme cruelty and repeated neglect towards your complainant, without provocation on her part, in this: that during inter-marriage and before the birth of the said child on the 24th day of May, 1927, the defendant entirely failed to support your complainant, and it was absolutely necessary for her to work at various positions to secure sufficient food and clothes, notwithstanding the fact the defendant was drawing ample salary to support your complainant and himself, and that it was necessary for the parents of your complainant to constantly send small sums of money to her to aid in her support; that during this time the defendant was continually remaining away from home all night, gambling away his salary, leaving your complainant alone and unprotected; that at the time the said son was born, it was necessary for your complainant to procure money from her parents so that she might return to their home in Nansemond County, Virginia, where the child could be born with the proper medical attention; that after the birth of the said child, the defendant refused and still refuses to pay the doctor's bill incident thereto, and her parents were compelled to pay the said bill; that the defendant was not with your complainant at the time the said child was born, but remained at home in Washington, District of Columbia, nor did he visit her or show any interest in her welfare or the child during her sickness, other than a hurried visit of only a short time several days after the child was born.

Your complainant further represents that after the birth of the said child, on the 24th day of May, 1927, she, wishing to give the defendant an opportunity to be with his child and anxious for a home with her husband, and trusting he would mend his ways, returned to Washington, District of Columbia, but, there found the same conditions existing as before, and was met with the same cruel treatment and neglect, and was unable to secure the necessary food for herself and her infant child; and that the defendant continued to remain away from his home at night, many

times arriving at home at daybreak, gambling away his salary and spending it on various other women, leaving your complainant and his three months old baby alone, without sufficient food and unprotected; that your complainant was humiliated and embarrassed and suffered great mental anguish because of the indifference, neglect and repeated cruelty of the said defendant; that on the day of October, 1927, your complainant was forced to procure money from her parents so that she might return with her infant child to their home in Hansemond County, Virginia, where they could have food and comfort; that your complainant was forced to enter training for a Registered Nurse, entering the Lakeview Hospital, Suffolk, Virginia, in August, 1928, and graduating therefrom September, 1931, in order to be able to help support herself and child, and that during the entire time your complainant was in such training, the defendant never contributed nor offered to contribute anything toward the support of herself and child, and never visited your complainant and child nor made any attempt to do so, and that had it not been for the aid of her parents, they would have been destitute and in great physical suffering; and,

(6) That your complainant is advised that mental anguish, repeated and unrelenting neglect and humiliation on the part of the husband, which results in the wife's enforced separation from his bed and board, is tantamount to desertion on his part; and,

(7) That your complainant last cohabited with the said John A. Amos at Washington, in the District of Columbia.

In consideration whereof, and forasmuch as your complainant is remediless, save in a court of equity, she prays that the said John A. Amos may be made a defendant to this bill, and be required to answer the same, but not on oath, the same being hereby waived; that proper process may issue; that the defendant be restrained and enjoined from interfering with or in any way molesting your complainant and child who is now with her; that a divorce from the bonds of matrimony may be

decreed her on the grounds of cruelty and desertion; that she be given the permanent custody of the said Ralph Allen Amos; and that the defendant be compelled to pay such sums of money as may be required to pay the costs of this suit and the fees of counsel proper to be paid to carry on this suit; that he may be compelled to make such permanent provision for the support of your complainant and child as may be just and right, and to secure the regular, prompt and safe payment of the same in such way as may to the court appear to be effectual; 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.

Martha R. Amos
Complainant.

E. Roland Burton p.q.

41
VIRGINIA:

IN THE CIRCUIT COURT OF NANSEIMOND
COUNTY.

MARTHA R. AMOS

vs.

JOHN A. AMOS

BILL OF COMPLAINT

Filed this 7th day of March, 1932

John H. Fawcett
Judge.

E. ROLAND CUSTIS
ATTORNEY AT LAW
SUFFOLK, VIRGINIA