1893_39 Southampton County Chancery ~ Hurst, Purnell + Co. et als vs Joyner, E.C. et als

Creditors suit

Hurst, Purnell + Co.
- Hurst, John E.
- Purnell, S.B.
- Jacksm, L.L.
- Clark, W.E.
- Hurst, W.B.

- Grubbs, W.F.
- " , Laura
- Joyner, R.S.
- " , Pauline M.
- " , Hinton R.
- Maddrey, W.C.
- " , Lizzie M.
- Minors: Joyner, Andrew
- By: Prince, J.B. (G.A.L.)

To the Hon. C. W. Hill. Judge of the Circuit Court of the county of Southampton.

Your orators. Jno. E. Hurst. S. B. Pennell. L. L. Jackson. W. E. Clark. & W. B. Hurst. merchants & partners trading as Hurst. Pennell & Co. complaining. sheweth unto the court. that on the day of 1887. R. S. Jaynes was indebted to your orators in the just & full sum of $627.30. that the said sum was then due & payable; that said Jaynes is still indebted to your orators to the said amount. (no part of it having been paid) for goods. wares. & merchandise sold him by your orators before said date as evidenced by open account. a copy of which is herewith filed. that the said R. S. Jaynes is a non-resident of this state. that he owns an interest in a tract of land in the state of Virginia & within the jurisdiction of this court. the said tract contains by estimation 375 acres. & is a part of the tract

called Grass Keys. lying about 3 miles from Bayhitos. it being a tract left by Dr C. D. Barham. decd to the seven children of his decd daughter. Virginia Joyner. in equal shares. and of whom is the said R. S. Joyner & the others are E. C. Pauline. M., Hinton R., & Andrew. Joyner. Laura the wife of W. F. Gibbs & Lizzie M. the wife of W. C. Maddrey; the said tract of land has never been divided between these children & is now in the immediate possession of Wm M. Beaton. as agent for the adults & Guardian for the infants; that the said R. S. Joyner also possesses. (jointly with his brothers & sisters. in the same manner as above) another interest in a piece of land containing 375 acres. left by Dr C. D. Barham. to his daughter Ellen Simmons. & at her death to the children of Virginia Joyner. if she left no issue: the said Ellen Simmons is still living but has no children: this last piece is contiguous to & ~~~~ a part of the original tract: that the said R. S. Joyner is

also entitled in same manner as in above cases, to a 1/7 interest in the piece of land on which the widow of the said Dr C. D. Basham, decd. now resides, at her death; that the said R. S. Joyner has no personal estate in this state or in N. C. where he lives, that yours orators can ascertain, out of which the amount of yours orators' bill could be made; that R. S. Joyner being entitled to an undivided 1/7 part of the first tract mentioned, & to a 1/7 interest in the other two tracts mentioned, yours orators are advised that they can subject the interest of R. S. Joyner in the said lands to sale to satisfy said account for $6.27.30 with interest from the day it came due, & that they are entitled to a decree establishing a lien for said amount & interest upon the interest of said R. S. Joyner in said tracts of land. And making R. S. Joyner, W. F. Grubbs & Lama his wife, E. C. Joyner, Pauline Dr & Hilton R. Joyner, W. C. Maddry & Lizzie M. his wife, & Andrew Joyner, parties defendant to this bill, & asking that a guardian ad litem be appointed to defend

the interests of the said two, they being infants. your orators pray that an attachment in due form may be issued, & that a decree may be made binding the real estate of R. S. Jaynes for the payment of the said sum of $627.30 with interest as aforesaid; that the said W. M. Beaton may be made a party & be compelled to render an account of the rents & profits due to R. S. Jaynes, & that the same be applied to the payment of the sum aforesaid; that the entire interest of said R. S. Jaynes in the first aforesaid undivided halfs of land be sold by decree & the proceeds paid over to your orators for the satisfaction of the sum aforesaid; & that if the proceeds of this be not enough to satisfy said sum, then that his interest in the other halfs be decreed to be sold & proceeds applied for same purpose; and that all such further & general relief as in the premises may be just & right may be granted; & your orators will ever pray, etc.

J. C. Parker. S. G.

Amiel. Pannell. vs
Ex Equity
Jaynes. R. S. et als

Know all men by these presents. that we, Hurst. Pennell & co do hereby make, constitute & appoint. J. C. Parker. our true & lawful attorney in fact. for us & in our name to execute a bond in the sum of Eleven hundred ($1100.00) Dollars. in the clerks office of the Circuit Court of Southampton County. to be given by us in the chancery cause pending in said court between us as plaintiffs & R. S. Jaynes & others as defendants. & conditioned to perform the future orders of the said court. should said Jaynes & others appear & make defence to said bill.

Witness our hand & seal this 2nd day of May 1887.

Seal

Hurst. Pennell & co
by John E. Hurst

State of Maryland, }
City of Baltimore }

I, William H. Raleigh, a Notary Public for the City of Baltimore and State of Maryland, duly appointed by the Executive Authority of the State of Maryland, do hereby certify that John E. Hurst, one of said firm whose name is signed to the foregoing above, bearing date on the 2nd day of May A.D. 1887- has acknowledged the

same before me in the City of Baltimore aforesaid as their act & deed.

Given under my hand and Notarial Seal at Baltimore this second day of May A.D. 1887.

Wm. H. H. Raleigh
Notary Public

WILLIAM H. H. RALEIGH
NOTARY
PUBLIC
BALTIMORE

147

Kurst: Pumices & Co
vs J. Stat Rule
Joyner Jr.

I, W. H. Stroud, editor of South-
ampton Democrat, a newspaper
published in the town of Franklin
in the county of Southampton, Va.
do hereby certify that the herewith
attached order of publication in
the suit of Hurst Purnell & Co
vs R. S. Joyner & others, was duly
published in said newspaper for
four successive weeks, from
& after the 24th day of Feb 1887

W. H. Stroud

IN THE CLERK'S OFFICE OF SOUTHAMPTON CIRCUIT COURT, FEBRUARY 16, 1887—IN VACATION.

Jno. E. Hurst, S. B. Purnell, I. I. Jackson, W. E. Clark, and W. B. Hurst, merchants and partners trading as Hurst, Purnell & Co. ptffs.
Against
E. C. Joyner, W. S. Grubbs and Laura, his wife, R. S. Joyner, Pauline M. Joyner, Hinton R. Joyner, W. C Maddrey and Lizzie M., his wife, and Andrew Joyner, the said Lizzie M. and Andrew Joyner by J. B. Prince, guardian ad litem.
In equity and upon attachment.

The object of this suit is to attach the undivided interest of R. S. Joyner in any real estate he may own in Southampton county, and also any personal estate, and to subject the same to the payment of the plaintiff's debt of $527.30, and affidavit having been made and filed that the defendants, E. C. Joyner, Pauline M. Joyner, W. S. Grubbs and Laura, his wife, R. S. Joyner, Hinton R. Joyner, W. C. Maddrey and Lizzie M., his wife, and Andrew Joyner, are non-residents of this State, it is ordered that they appear here within one month after due publication hereof and do what is necessary to protect their interests.

A Copy—TESTE:
J. B. PRINCE, C. C.
J. C. PARKER, p. q. fe24-4t.

In Southampton Circuit Court.

Jno E. Hunt. L.B. Prince & L. L. Jackson
W. E. Black. & W.B. Hunt. trading as
Hunt. Prince & Co. Pltffs.

against

R. S. Joyner Hinton R. Pauline M. Andrew Joyner. E. C. Joyner. W. F. Gubbs & Lana his wife. W. C. Maddrey & Lizzie M. his wife. Lizzie M. Maddrey & Andrew Joyner - infants -. Defts.

In Equity.

1881.

Feby 16. Or: Pub: against all parties.

Jany 27 Atto: against infant of R. S. Joyner. Defd.

Mch. 21 Or: Pub: Posted.

Mch Rules. Bill filed. L.B. Prince assigned Gdn ad litem to infants.

Apl " Cause set for hearing.

Will of

C. D. Barham

In the name of God amen.
I Cuthbert Q. Barham of the County of Southampton and State of Virginia, do make and constitute this my last will and Testament revoking all others heretofore made by me.

Item 1st After the payment of my just debts and burial expences I give unto my beloved wife Martha J. Barham, all of the currency which may be in the house at the time of my death, also one third of all the money which may come into the hands of her my Executrix from the sale of my chattel estate collection of my accounts &c. I also give her one years support in provisions of every necessary kind; two first choice horses or mules, four choice cattle, three feather beds and fixtures, and one set of chairs, enough farming implements to carry on a two horse farm, ten choice hogs and whatever else she may think necessary for housekeeping.

Item 2nd I give unto my wife during her natural life, my mansion house

together with all the land lying on the south side of the road leading from Jerusalem to Boykins Depot.

Item 3rd I give unto the children of my deceased daughter, Virginia Joyner, one half of all my specie, to be equally divided among them, also one third of all monies which may come into the hands of my Executrix from the sale of my chattel estate, and the collection of my accounts & bonds &c.

Item 4th I give unto my daughter Ellen Simms the remaining half of my specie, together with the remaining third of the monies which may come into the hands of my Executrix as in item 3rd of this my will.

Item 5th I give unto my son Roscoe G. Barham and his heirs forever the tract of land on which my father lived & died, and should my wife die first it is my wish that he have during his life the place which I have loaned her.

Item 6th The portion of my home tract of land not yet divided, I loan unto my daughter Ellen Simms and my

Grandchildren, the children of Virginia Joyner deceased in this manner namely - I wish my daughter Ellen to have the use of one half of it to use as she may think proper; the other half I wish my grand children mentioned above to have the benefit of as may seem best to their guardian or representative, Should Ellen Simms die before Roscoe, it is my desire that her portion of the land mentioned be used to the benefit of all my grand children provided my daughter has no children at her death. if she should leave any then it is my wish that her children should have the use of the portion which I leave her.

Item 7th After the death of my son Roscoe and my daughter Ellen I desire that all the land which I have loaned them be equally divided between all of my grand children together with the land which I have set apart for the use of the children of my daughter Virginia Joyner dec'd. That is to say I wish all

of my land which is owned by me
except the tract on which my father died,
which I have given to my son Roscoe
in fee simple, to be fairly divided be-
tween all of my childrens children
or their representatives so that each
of them may have an equal portion.

Item 8th I give unto Ben Barham colored at
my death should Ben be living such-
one at that time. that portion of my
tract of land over the branch known
as the Bay pond branch and bounded
on the west side by said branch and
on the East & South by the lands of
Ben E. Pope,

Item 9th I appoint and constitute my wife
Martha J. Barham to be my sole
executrix to this my last will and
request that she be allowed to qual-
ify as such without being required
to give Security.

Given under my hand this 29th
day of November 1875.

C. D. Barham Seal

Witnesses
David N. Kindred
Peleg Carson

At a Court held for County of Southampton, on the 17th day of January 1896. This last will and Testament of Cuthbert G. Barham, was proved by the oaths of David H. Kindred & Allegr Carron. the subscribing witnesses thereto, and ordered to be recorded. And on the motion of Martha J. Barham the Executrix therein named, who made oath according to law, and entered into and acknowledged a Bond in the penalty of Ten thousand dollars. but without Security. the will directing none to be taken, and the Court requiring none, which Bond is ordered to be recorded. Cer = tificate is granted the said Martha J. Barham for obtaining a probat of the said will in due form.

Teste.

L. R. Edwards. C. C.

" " "

In the Circuit Court of Southampton Co

Hurst. Pinnell &c }
vs
R. S. Joyner et als }

This day this cause came on to be heard upon the Bill taken for confessed as to the adult defendants, & the answers of J.B. Prince, Edm ad litem for the infant defendants & upon the answer of W. M. Beaton, guardian defendant, upon the exhibits filed & the evidence of witnesses, & was argued by counsel. On consideration whereof the Court doth adjudge order & decree that one of the commissioners of this Court take a true & perfect account of all the interest of said R.S. Joyner in said property attached, owned by him as one of the devisees under the will of C. D. Basham, deceased, whether the same be vested contingent or in reversion, the annual & also the total value of the same, whether the same be divided or undivided, & also an account of the rents & profits due or to become due to said

Joyner on said land. by Wm M. Beaton or any attorney & also any other matter deemed pertinent by himself or which any of the parties interested may require him so to state. And he shall make report to this court at the next term thereof. And leave is hereby granted the plaintiff to amend his bill by making parties thereto any persons interested in said land under the said will who have not been made parties already. or in any other manner he may see fit. provided, & that the same be done at least 60 days before the next term of the court.

Russell Pamuel vs Joyner & others

No. 119

Decree

Pro Tem. 1887

To be entered

C.M.D.

Hunt. Pennell & co. , Plts
Vs
Joyner. R. S. et.als. Defts } decree.

This day this cause came on to be heard upon the papers formerly read upon the report of Comr B. F. McLemore. to which report no exceptions have been made. & was argued by counsell.

In consideration whereof. & it appearing to the court that. the interest of R. S. Joyner in the tract of land described in the endorsement. upon the attachment. as ascertained by said Comr's report. is not such an interest as ought to be sold at this time by this court. now therefore the court doth adjudge. order. & decree. that J. C. Parker. who is hereby appointed a special Comr for that purpose. ~~file in the clerk's office of the Circuit Court of this County. a "list of lands" or "attachment" against said interest of Joyner in said land. in favor of Hunt. Pennell & co. the Plaintiffs in their suit. which shall operate as a lien in favor~

~~upon said interest~~; ~~and said Court~~ shall also collect of Wm M. Bolton one of the defendants in this suit, the amount in his hands due to said R. S. Joyner, & shall proceed each year hereafter to collect the portion of the income from said land, belonging to said Joyner, & out of the amounts so collected shall pay first the costs in this suit, ~~including an attorneys fee of~~ ~~Dollars~~, & the balance as it is collected, he shall pay to Hurst, Pennell & Co as fast payments on their account against said Joyner. But said Com'r before entering into the discharge of his duties as Com'r shall execute a bond in the penalty of Fifty - - - Dollars, conditioned for the faithful discharge of his duties under said decree. And he shall make report to this Court from time to time.

with Surety deemed sufficient by the Clerk

Chas. Com'r

Chas. Com'r

Chancery 276

Chancery Pennell & Co
vs
Joyner, R. S. et als
Decree
Nov Term 1887
To be entered.
C Moore
101

Affidavit for attachment

Hurst Pennell & Co

vs

Joynes, R.S.

Hurst. Pennell & Co

vs

Joynes

- Affidavit -

Virginia, Southampton Co. to wit:
I. J. Parker, a notary public in & for the county aforesaid, hereby certify that W. T. Fagan as agent for Hunt Pennell & Co of Baltimore, Md. this day appeared before me & made oath that R. S. Joyner of Wmsboro, N. C. is justly indebted to the said Hunt, Pennell & Co in the sum of $27.30. That this debt is now due & there is present cause of action therefor. That the said Joyner is not a resident of this state, & that he believes said Joyner has estate or debts due him in the County of Southampton, Va.

Given under my hand this 27th day of January 1887.

J. C. Parker, N. P.

Hurst Purnell & Co
vs 3 or. Pub
Jaynes Vt

1887. Feb 16

In the Clerks office of Southampton
Circuit Court - Feby: 16. 1887.

In Vacation.

Jno E. Hunt. L. B. Purnell - L. L. Jackson,
W. E. Clark & W. B. Hunt - Merchants & Partners
trading as Hunt. Purnell & Co.

against - } In Equity & Upon
attachment.

E. C. Joyner, W. F. Grubbs and Laura his wife, R. S.
Joyner, Pauline M. Joyner, Hinton R. Joyner, W. C. Moody,
Lizzie M. his wife & Andrew Joyner. the said Lizzie M. & Andrew
Joyner by L. B. Purnell their next friend

The object of this suit is to attach the
undivided interest of R. S. Joyner in any real estate
he may own in Southampton Co. and
also any personal estate also. and to
subject the same to the payment of
the plaintiffs debt, of $ -. and
affidavit having been made and
filed that the defendants, E. C. Joyner, W. F.
Grubbs, & Laura his wife, R. S. Joyner, Pauline M. Joyner, Hinton R. Joyner W. C. Moo-
dey & Lizzie M. his wife and Andrew Joyner
are non residents of this State, it is
ordered that they appear here within
one month after due publication
hereof and do what is necessary
to protect their interests.

Teste L. B. Purnell c.c.

J. C. Parker p.q.

(1) (1)

May Term 1887.

In the Circuit Court of Southampton Co:

Hunt. Purnell & bo }
vs
R. L. Joyner et als }

This day this cause came on to be heard upon the Bill taken for confesed as to the adult defendants & the answers of J. B. Prince. Gdn ad litem for the infant defendants & upon the answer of H. W. Beaton. Garnishee defendant upon the 4 exhibits filed & the evidence of witnesses & was argued by counsel. On consideration whereof the court doth adjudge order & decree that one of the commissioners of this court take a true & perfect account of all the interest of said R. L. Joyner in said property attached, owned by him as one of the devisees under the will of D. D. Barham deceased. & whether the same be vested contingent or in reversion. the annual & also the total value of the

same. & whether the same be di-
vided or undivided. & also an
account of the ~~rents~~ & profits
due or to be come due to said
Joyce on said land. by Wm
H. Beaton, or any otherwise &
also any other matter deemed
pertinent by himself or which
any of the parties interested
may require him so to state.
And he shall make report to
this court at the next term
thereof. And leave is hereby
granted the plaintiff to amend
his bill by making parties there-
to any persons interested in
said land under the said
will who have not been made
parties already or in any
other manner he may see
fit. provided that the same
be done at least 60 days before
the next term of this court.

A Copy.

Test: B. F. McLemore C.C.

Hunst. Pinnell & Co

vs

Notice

Wm M. Beaton

Jayness

1887. Sept: 26.

Executed Sept 1st 1887 by
delivering to W M Beaton
a copy of this Summons

J. W Williams Sheriff

Commissioner's Office,

Jerusalem, Va., Augt 22 1887

To Wm M. Beaton, Hunt. Tunnell & Co. and others -

You are hereby notified that I have fixed upon the 26" day of September next, if fair, if not, the next fair day thereafter (Sunday excepted), to take and settle, at my office, the following accounts, to wit:

An account of Robt. S. Joyner's interest in the tract of land bequeathed to him by L.D. Barham, dec'd in his last Will and testament, whether the same be vested, Contingent or in reversion - the Actual and annual value of the same - whether said interest be divided or undivided - And also, an account of the rents & profits due or to become due to said Robt S. Joyner, by Wm M. Beaton or otherwise - with any other matter specially stated deemed pertinent by himself, or which he may be required to state by any party interested.

required to be taken by a decree of Southampton Circuit Court, rendered at the May term, 1887, in a suit in chancery depending in said Court, in which you are parties, plaintiffs and defendants; at which time and place you are required to attend.

Given under my hand, as Commissioner in Chancery of said Court, the day and year first aforesaid.

B. F. M. Lewis

Commissioner.

To the Sheriff of Southampton County to execute.

Hurst. Pinnell & C.

Report

Joyner & als:

1887. Oct: 10. filed

B. F. M. C.C.

An Account of the fee simple and annual value of R. S. Joyner's undivided interest in the real Estate of which his Grand father Dr C. D. Barham died seized and possessed. Reported by B. F. McLemore Comr in Chancery & the Circuit Court for the County of Southampton on the 26th day of September 1887. in obedience to a decree of said Court entered at the May term 1887. in the Chancery Cause of Hurst, Pennell & Co. & Joyner et. als: -

1/8 undivided interest in 1125 Acres of land. @ $4.00 per acre	Contingent Value	Fee simple Value	Annual Value
		$562.50	$ 15.00

Respectfully Submitted
B. F. McLemore
Comr in Chancy

Commissioner's Office -
Jerusalem. Sept 26. 1887.

To the Circuit Court of Southampton Co.

Pursuant to a decree of the Circuit Court of Southampton County, rendered at the May term 1887. in the Chancery Cause therein depending under style of Hurst, Purnell & Co. v. Joyner + als: the undersigned, one of the Commissioners of said Court. to whom was referred for settlement, certain accounts asked for in said decree., Reports to Court, that on the 22d. day of Augt. 1887, he issued Notices against the resident parties to this suit. requiring them to attend the settlement of said Accounts, before him, at his office. in Jerusalem, on the 26th day of Sept. 1887., That said Notices have been returned to the Commissioner, Executed. And thereupon he proceeded to state an Account of the fee simple and annual value of the interest of R. S. Joyner, in the real Estate of his Grand father, Dr C. D. Barham dec'd.; and reports: That R. S. Joyner has an undivided- Contingent- 1/8 interest in 1125 acres of land, situated in Southampton County. valued at $4.00

per acres - the fee simple value of which is $562.50 - and the annual value of the same is only $15.00, that being the amount which the defendant R. S. Joyner realizes from said land annually.
The Commissioner being also required to state an account of the rents and profits due or to become due to said R. S. Joyner, by Wm M. Beaton or otherwise, begs leave report that on or about the 25th day of December 1887. Wm M. Beaton will owe said Joyner the sum of $14.63 - that being his part of the rent of said real Estate for the year 1887.

Respectfully Submitted -
B. F. McLemore
Comr in Chancy

Commissioner's fee
$5. — ch Plaintiffs

The respondt answer of Wm M. Beaton to a bill of complaint filed agnst R. S. Jaynes & others by Hust. Powell & bro complainants, in which he the said W. M. Beaton is made a party defendant, as a garnishee, in the Circuit Court of Southampton County.

The respondt reserving to himself the benefit of all just exceptions to the said bill for answer thereto, or to so much thereof as he is advised it is material he should answer, answers & says, that he owes & has in hand for the said R. S. Jaynes, the sum of Fourteen 63/100 - Dollars & this amount is all he has belonging to said Jaynes & all he owes him, & this he is ready & willing at any time to pay over to whomsoever the court may direct.

And this respondt denies all fraud & confederacy & having fully answered the complainants bill, prays to be hence dismissed with his reasonable costs by him in this behalf expended & he will ever pray.

Wm M Beaton

J. C. Parker, p. d.

Virginia, Southampton County, to wit:
This day personally appeared before
me Geo: E. Beaton a Justice of the Peace
for the county state aforesaid, Wm M.
Beaton, whose answer is above
written, & made oath that the state-
-ments contained in said answer
so far as made of his own know-
-ledge are true: & so far as divised
from others they are believed to be
true.

Given under my hand this 23rd
day of April - 1887.

George E. Beaton
J. P.

Chancl. Pennell Mss
Answer of
Beaton. (Executor)
Joyner, R. S. Petitioner

Hurst Purnell & Co

vs

Dunn

Joyner & als:

1887 Mich Rules

Cir: Ct:

Executed by
delivering a true
copy of the within
summons to the
within named
D B Dunn.

R D & T B Dunn
Sheriff to ss A Buchanan Clk
Feby 7/87

The Commonwealth of Virginia,

TO THE SHERIFF OF SOUTHAMPTON COUNTY—Greeting:

WE COMMAND YOU TO SUMMON Lizzie M. Joyner, (formerly Lyne) and Andrew J. Joyner minors by J. B. Prince their Guard. ad litem.

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 first Monday in March next, to answer a bill in chancery exhibited against them + als in our said Court by John E. Hunt. Littleton B. Purnell. Lloyd L. Jackson. Wm E Clark & H. B. Hunt— Trading as Hunt, Purnell & Co.

And this they shall in no wise omit; and have then there this writ.

Witness, J. B. PRINCE, Clerk of our said Court, this 7th day of February 1887, in the 111th year of the Commonwealth.

J. B. Prince C. C.

The Commonwealth of Virginia,

TO THE SHERIFF OF SOUTHAMPTON COUNTY—Greeting:

WE COMMAND YOU TO SUMMON Hinton R. Joyner

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 first Monday in March next, to answer a bill in chancery exhibited against him & others in our said Court by Jno. E. Hurst. Littleton B. Purnell. Lloyd L. Jackson. Wm. E. Cladd & W. B. Hurst. trading as Hurst Purnell & Co.

And this he shall in no wise omit; and have then there this writ.

Witness, J. B. PRINCE, Clerk of our said Court, this 27 day of January 1887, in the 111 year of the Commonwealth.

J. B. Prince C. C.

The Commonwealth of Virginia,

TO THE SHERIFF OF SOUTHAMPTON COUNTY—Greeting:

WE COMMAND YOU TO SUMMON Pauline M. Joyner

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 first Monday in March next, to answer a bill in chancery exhibited against her & others in our said Court by Jno. E. Hurst, Littleton B. Purnell, Lloyd L. Jackson, Wm. E. Clark, H. B. Hurst, trading as Hurst, Purnell & Co.

And this She shall in no wise omit; and have then there this writ.

Witness, J. B. PRINCE, Clerk of our said Court, this 27 day of Jany 1887, in the 111 year of the Commonwealth.

J. B. Prince C. C.

The Commonwealth of Virginia,

TO THE SHERIFF OF SOUTHAMPTON COUNTY—Greeting:

WE COMMAND YOU TO SUMMON Andrew J. Joyner

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 first Monday in March next, to answer a bill in chancery exhibited against him & others in our said Court by Jno. E. Hurst Littleton B. Purnell Lloyd L. Jackson Wm E. Clark & H. B. Hurst trading as Hurst Purnell & Co.

And this him & others shall in no wise omit; and have then there this writ.

Witness, J. B. PRINCE, Clerk of our said Court, this 27 day of Jany 1887, in the 111 year of the Commonwealth.

J. B. Prince C. C.

The Commonwealth of Virginia,

TO THE SHERIFF OF SOUTHAMPTON COUNTY—Greeting:

WE COMMAND YOU TO SUMMON Lizzie M. Joyner

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 first Monday in March next, to answer a bill in chancery exhibited against her & others in our said Court by Jno. E. Hurst Littleton B. Purnell. Lloyd L. Jackson. Wm. E. Clark & H. B. Hurst trading as Hurst Purnell & Co.

And this she shall in no wise omit; and have then there this writ.

Witness, J. B. PRINCE, Clerk of our said Court, this 27 day of Jany 1887, in the 111 year of the Commonwealth.

J. B. Prince C. C.

The Commonwealth of Virginia,

TO THE SHERIFF OF SOUTHAMPTON COUNTY—Greeting:

WE COMMAND YOU TO SUMMON Edw.d C. Joyner

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 first Monday in March next, to answer a bill in chancery exhibited against him & others in our said Court by Jno. E. Hurst, Littleton B. Purnell, Lloyd L. Jackson, Wm. E. Elliott & H. B. Hurst, trading as Hurst Purnell & Co.

And this he shall in no wise omit; and have then there this writ.

Witness, J. B. PRINCE, Clerk of our said Court, this 27 day of Jany 1887, in the 111 year of the Commonwealth.

J. B. Prince C. C.

The Commonwealth of Virginia,

TO THE SHERIFF OF SOUTHAMPTON COUNTY—Greeting:

WE COMMAND YOU TO SUMMON Robt. S. Joyner.

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 first Monday in March next, to answer a bill in chancery exhibited against him & others in our said Court by John E. Hurst, Littleton B. Parnell, Lloyd L. Jackson, Wm. E. Hart, & W. B. Hurst, trading as Hurst Parnell & Co.

And this he shall in no wise omit; and have then there this writ.

Witness, J. B. PRINCE, Clerk of our said Court, this 27 day of Jany 1887, in the 111 year of the Commonwealth.

J. B. Prince C. C.

Hurst Purnell & Co

vs Z Summons

J Green &c.

1887. 1st day May
Term Circuit Ct

Executed Feby 16/87
by delivering a true Copy
of within Summons to
W. M. Beaton.

J. L. Barham
Sheriff

The Commonwealth of Virginia,

To the Sheriff of Southampton County—Greeting:

WE COMMAND YOU TO SUMMON Wm Bealer

to appear before the Judge of our Circuit Court of Southampton County, at the Courthouse, on the first day of May Term next, to answer upon oath whether he has in his hands any money or other estate due R. S. Joyner or not

And have then there this writ.

WITNESS, J. B. PRINCE, Clerk of our said Court, at the Courthouse, this 10 day of Feby, 1887, in the 111 year of the Commonwealth.

Teste J. B. Prince b.c.

Hurst Purnell & Co
vs
Joynes
1887. Mch. Rules

Sum 89

The Officer is directed to attach the interest of Robt. D. Joynes in a tract of land situated at Drs Neck, in this County, & known as the Whitehurst tract. he having an undivided interest in said land, bequeathed to him by the Will of C.D. Barham dec'd. -- The proper Affidavit having been made by N.B. Payan. Agt. Pl.

L.B. Spence
C.C

Executed by attaching the real Estate of Robt. D. Joynes mentioned in the Deed of this Memorandum Jany 27 1887. —

L.S. Barkeum
Sheriff

Pd. this Attachment in the within and in Whitehurst - of this date

L.S. Barkeum
Sheriff

THE COMMONWEALTH OF VIRGINIA,

To the Sheriff of Southampton County—Greeting:

WE COMMAND YOU TO SUMMON R. S. Joyner, Winton R. Pauline M. Andrew J. Lizzie M. Laura E. and Edw.d L. Joyner

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 first Monday in March next, to answer a bill in Chancery exhibited against them in our said Court by John E. Hurst, Littleton B. Purnell, Lloyd L. Jackson, Wm E. Clark & H. B. Hurst, trading as Hurst, Purnell & Co.

And this they shall in no wise omit; and have then there this writ.

WITNESS, J. B. PRINCE, Clerk of our said Court, this 27th day of January, 1887, in the 111th year of the Commonwealth.

Testo: J. B. Prince C.C.

Hindi Pamphlets
as
R. Jayaswal

J. C. PARKER,

Attorney at Law,

COURTS:
ISLE OF WIGHT,
SOUTHAMPTON,
NANSEMOND.

FRANKLIN, VA.

Virginia: Southampton Co to wit:-
I. J. C. Parker. hereby maketh oath
that to the best of my knowledge
belief. Jno. L. Hurdle. & Charles.
A. George. are non residents of
of the state of Virginia & are
residents of the City of Baltimore
Md.

J. C. Parker

Sworn to before me this 29th
day of April 1867. by J. C. Parker
A. R. Edwards N. P.

The Commonwealth of Virginia.

To any Justice of the Peace or Notary Public for the City of Baltimore in the State of Maryland.

Know ye that we trusting to your fidelity and provident circumspection in diligently examining John E. Hurst and Charles A. George witnesses on behalf of Hurst, Purnell & Co in a suit now depending in our Circuit Court for Smith amplm County between the said Hurst, Purnell & Co. plaintiffs and R. S. Joyner & others defendants, command you or any two or more of you that at such certain day and place as you shall appoint you assemble yourselves and the witnesses aforesaid before you, you call and cause to come and diligently examine on the Holy Evangelists of Almighty God, and their examinations into our said Court, distinctly and plainly without delay you send and certify inclosed. Witness I. B. Prince Clerk of our said Court, at the Court House this 29th day of April 1884, and the seal of said Court in the 111th year of the Commonwealth.

I. B. Prince C. C.

Hurst, Purnell & Co.,	)	In the Circuit Court
	)	
vs.	)	for
	)	
R. S. Joyner et al.	)	Southampton County,
		State of Virginia.

Depositions of John E. Hurst and Charles A. George, witnesses, taken before me, William H. H. Raleigh, a Notary Public for the City of Baltimore, in the State of Maryland, on the Second day of May, in pursuance of the annexed notice, at the office of Hurst, Purnell & Co., in the City of Baltimore and State of Maryland, between the hours of 6 A.M. and 6 P.M. to be read in evidence in a suit in which Hurst, Purnell & Co. are plaintiffs, and R. S. Joyner et al, are defts. pending in the Circuit Court for the County of Southampton, in the State of Virginia.

Neither Plaintiffs nor Defendant represented by Counsel.

John E. Hurst, (the witness) being first duly sworn, deposeth and saith as follows:--.

My name is John E. Hurst, am a resident of Baltimore City, State of Maryland, am of legal age, and a partner of the firm of Hurst, Purnell & Co., Merchants trading and doing business in Baltimore City. My firm did during the year 1886, sell and ship to R. S. Joyner, of Warrenton, North Carolina, several bills of goods as appear in the annexed itemized statement of account marked Exhibit"A" as follows-

March	17th.	1886	terms	4 mos.	4.20
April	13th.	"	"	4 mos.	20.97
May	3rd.	"	"	4 mos.	26.60
May	6th.	"	"	4 mos.	9.74
"	6th.	"	"	4 mos.	2.75
"	13th.	"	"	4 mos.	7.00
June	5th.	"	To Cash		.75
June	18th.	"	terms	4 mos.	27.78
"	"	"	"	60 days.	8.75
July	6th.	"	"	60 days.	19.90
"	"	"	"	4 mos.	2.75
"	13th.	"	"	60 days	25.51
"	"	"	"	4 mos.	40.27
"	20th.	"	"	Net.	4.64
"	20th.	"	"	4 mos.	26.80
Aug't.	3rd.	"	"	60 days.	18.20
"	4th.	"	"	4 mos.	62.17
"	27th.	"	"	5% 60ds. Oct.1st	118.13
"	"	"	"	60 ds. Oct. 1st.	141.74
"	"	"	"	4 mos. Oct.1st.	375.23
"	"	"	"	4 mos. Oct. 1st.	18.19
Nov.	5th.	"	"	60 days	7.38
"	"	"	"	4 mos.	60.24 $1119.57

amounting to $1119.57 at the times and on the terms therein stated, on which there are several credits given as per the dates and amounts therein stated, aggregating the sum of $594.32 and an additional credit of April 9th.1887, as received from the Assignee of said R. S. Joyner, of the sum of $65.88 after deduction of which credit there remains a balance due Hurst, Purnell & Co., from said R. S. Joyner the

sum of $461.42 as appears on said itemized statement of account herewith annexed marked Exhibit "A" and said sum is justly due and owing to the saidHurst, Purnell & Co., by R. S. Joyner ~~et al~~. of which no part has been paid or satisfaction had therefor.

John E. Hurst

Charles A. George,(the witness)being first duly sworn, deposeth and saith as follows:-

My name is Charles A. George, am a resident of Baltimore City, State of Maryland, of lawful age, and am a clerk for the firm of Hurst, Purnell & Co., and was at the time the goods, wares and merchandise charged in the annexed account marked Exhibit "A" were sold and shipped to R. S. Joyner, of Warrenton, North Carolina, and the prices charged in said account were fair and reasonable when the goods were sold, and the balance of $461.42 is now justly due and owing by R. S. Joyner to Hurst, Purnell & Co., without any further offsets than the credits given.

Chas A. George

State of Maryland,)
City of Baltimore.)

I, William H. H. Raleigh, a Notary Public for the City of Baltimore in the State of Maryland, do hereby certify that the foregoing depositions were duly taken, reduced to writing, and signed by the witnesses, respectively, before me, at theplace and the time therein mentioned, pursuant to the annexed notice. In witness whereof, I have hereunto set

my hand and affixed my Notarial Seal at Baltimore aforesaid, this second day of May A.D. 1887.

Cost of Depositions $2.50
Postage .04
$2.54

Wm. H. C. Raleigh
Notary Public

JOHN E. HURST.
LITTLETON B. PURNELL. WM. E. CLARKE.
LLOYD L. JACKSON. WM. B. HURST.

5 per cent off if paid within 10 days } 4 months
5 " " 30 "

POSITIVELY NO GOODS TAKEN BACK UNLESS DAMAGED.

NOTICE.—*If this Bill is not in all respects as the trade was made, we must be notified at once, as absolutely no change will be allowed at the time of settlement.*

Baltimore, Mar 17 1886

Mr R S Joyner
Warrenton NC

BOUGHT OF

HURST, PURNELL & Co.

IMPORTERS & JOBBERS OF

DRY GOODS, NOTIONS & WHITE GOODS.

SPECIAL ATTENTION CALLED TO NOTICE AT TOP.

HOPKINS PLACE,
COR. SHARP, GERMAN & LIBERTY STS.

A. NORRIS & CO., BALTIMORE.

Exhibit "A"

1	Doz Ladies Solin hose			75	
1	" Fey da			75	
1/4	" Reynolds Socks	4.80		120	
1	Gro Metal Buttons			150	4 20
	April 13th 1886 4 Mos				
27	Coats	55		1485	
1	Combination Collars			1	
2	Gro Pearl Buttons	1.00	1/3	325	
1	@ 3/4 Laces			37	
1	M Tags			50	
5	lb Hunk Cotton	30		1	2097
	May 3 1886 4 Mos				
1	Doz Gauze shirts			2	
2	" da	4.00		8	
1	" da			6	
1	" Combination Collars			1	
1	" Gro 1/2 hose			30	
1	" Fey da			75	
4	" Coats Cotton	55		220	
1	Gro Shoe buttons			10	
4	pcs Mosquito Net 2.35	2.40		150	
2	alpaca Umbrellas 1.70	1.00		470	2660
	May 6th 1886 4 Mos				
2	pcs Shantung Lawns 1.05	2/4		474	
1	" Fey Robe			500	974
	May 6th 1886 4 Mos				
1/2	Doz Gent Drawers	4.50		225	
1/2	" Collar Buttons	1.00		50	275
				Forward	6476

		Forward				64 26
		May 13th Hellos	1886			
1	ps	Idunetta Cloth	7	10	700	700
June	5	To Cash				75
		June 18 1886 Hellos				
1	Doz	Ladies Blk Hose			2	
1	"	" Gloves			125	
1	"	" Collars			1	
4	"	Coats Cotton		55	220	
1	"	Ebg & White Ties			75	
1	"	Plain da			35	
1	"	Violet & Nun da			450	
1	"	Perfection da			6	
1	"	Balbriggan ½ hose			2	
1	Gro	Pearl shirt Buttons			75	
2	"	da da da		1/65 1/75	140	
1	"	Falcon Ties			45	
3		Umbrellas		125	375	
1		do			138	27 78
		June 18th 1886.	60 days			
1	ps	Simpson Black	49	6½	282	
1	"	D.K. Cambric	60	7	420	
1		Victoria Lawn c	24	7¼	173	875
		July 6th 1886	60 days			
1	ps	3/4 Grantville Drill	50 3/4		201	
2	"	4/4 Piedmont da	53 3/4	6	606	
1	"	da Conestoga W	46 3/4	5	246	
1	"	da Stark da	61	6	366	
1	"	7/8 Ox da	60	3/4	284	
1	"	13/4 Armuinga Quilts			125	
1		10/4 Heela Blkts	1	25 3/4	440	
		Dray			25	1990
		July 6th 1886 Hellos				
5	Dz	Coats Cotton		55		275
		Forward				131 19

JOHN E. HURST.
LITTLETON B. PURNELL. WM. E. CLARKE.
LLOYD L. JACKSON. WM. B. HURST.

6 per cent off, if paid within 10 days } 4 months
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Baltimore, 188

Mr R. S. Joyner
Continued

Bought of **HURST, PURNELL & CO.**

IMPORTERS & JOBBERS OF
DRY GOODS, NOTIONS & WHITE GOODS.

SPECIAL ATTENTION CALLED TO NOTICE AT TOP.

HOPKINS PLACE,
COR. SHARP, GERMAN & LIBERTY STS.

A. HOEN & CO. BALTIMORE.

	Forward					131 19
	July 13th 1886	60 days				
3 pcs	Merrimac Shirting	16	2½	7 29		
3 "	Stanhope Lawns	17	3½	7 79		
1 "	4/4 Amory Brown	49	6	2 94		
2 "	Riverside Plaids	109	6½	7 11		
	Draft			38		25 51
	July 13th 1886	4 Mos				
1 Doz	Florence Shirts			4 50		
1 "	W D do			4 50		
1 "	Bro Drawers			3		
1 "	do			3		
1 "	Bro ½ hose			37		
1 "	Solid do			35		
1 "	Fcy do			75		
½ "	Balbriggan do	3	50	1 25		
1 "	Ladies Fcy hose			75		
1 "	do			75		
1 "	Flt Cuff			2 00		
3 "	Coats Cotton		55	1 65		
½ "	Scarfs		4 50	2		
1 "	Fancy hand Kf			1		
2 "	Umbrellas		50	1		
2	16 rib do		75	1 50		
2	do	1	00	4 25		
1½	Boys Mld. Shirts		4 50	6 75		40 29
	July 20 1886	Net				
1 pc	4/4 Puritan Bleach	49	7½	3 69		
½ lb	Cold Twine		35	90		
	Cooper Cork			35		4 64
	Forward					201 61

			Forward		20 1 61
	July 20 1886. 4 Mos				
1	Doz Percale Shirts		9		
1/2	Percale do	12 00	6		
1	Daisy Corset		2 75		
1	White Handkerchfs		35		
1	Colored do		45		
1	do		75		
1/2	Jumpers	4 50	2 25		
2	Florence Collars	1 00	2		
1	Germania do		1 25		
1/2	La Dal. Hose	3 00	1 50		
1	Gra Hvy 4/4 Lace		50		26 80
	August 3rd 1886 60 ds				
2	pc Stanhope Lawns	11 5 4	4 60		
1	" andros 46in Bleach	5 1/2 11	5 75		
1	" do 48in Bro	49 10	5 20		
2	" 20in Draper	2 55	1 10		
2	" 24in do	2 65	1 30		
		Dray	25		18 20
	August 4th 1886. 4 Mos				
1	Doz Las Bal		2		
1	Cor Shirts		3		
1	do		4		
1/2	Champion	9 00	4 50		
3 1/2	Daisy	6 00	21		
2 1/2	Flerrick	4 50	11 25		
3	Combination Collars	1 00	3		
1/2	Pat. Lever Pearl Sleeve	1/4 2 00	1/4 2 25	1 07	
1/4	Plaited	4 00	1		
1	Pearl Collar Button		1		
3/4	10 yds Rubber draper	35	3 50		
1/2	Lisle do	12 00	2		
1/2	White Dress Shirts	9 00	4 50		62 17
			Forward		308 78

JOHN E. HURST.
LITTLETON B. PURNELL. WM. E. CLARKE.
LLOYD L. JACKSON. WM. B. HURST.

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Baltimore, 188

Mr R S Joyner

Continued

Bought of

HURST, PURNELL & CO.

IMPORTERS & JOBBERS OF

DRY GOODS, NOTIONS & WHITE GOODS.

SPECIAL ATTENTION CALLED TO NOTICE AT TOP.

HOPKINS PLACE,

COR. SHARP, GERMAN & LIBERTY STS.

A. MORTON & CO., BALTIMORE.

	Forward					308 78
	August 27th 1886	30%	60 ds	Oct 1		
6	pc Merrimac Shirting	270	3/4	12 82		
11	" oak Lodi & Knickerbocker	562	3/4	25 32		
2	Dunnell	89	5/8	4 93		
4	Cochico	139	5/8	7 64		
4	Hamilton Staples	190	5	9 51		
1	Allen Check	45	5	2 28		
6	Stark River & Allen	273	5/8	15 02		
3	Scotch & Simpsons Gry	148	6	8 91		
3	Bombay	147	6	8 89		
2	Pacific Furn Cotton	97	6/8	6 35		
1	Merrimac furniture	57	8/8	4 42		
5	Solids	240	5	12 04		118 13
	August 27th 1886	60ds	Oct 1st			
1	Calcutta Gingham	40	8	3 20		
2	Arlington da	105	7	7 39		
2	Normandy da	80	8	6 46		
1	Whittenton St da	28	8/8	2 42		
4	Renfrew da	175	8/8	14 92		
1	Queens Cloth da	43	8	3 46		
1	Cadyston Lining	48	6	2 93		
1	Eagle Stripe	64	7	4 52		
1	Columbian Chevit	63	7/8	4 61		
2	Edinburgh da	110	8/8	9 35		
1	Oakland A Tick	64	6	3 72		
1	S F S da	52	9/8	4 99		
1	4/4 Puritan Plea	57	7	3 57		
1	" 76 Langdon do	53	8/8	4 28		
2	3/4 Farmers Brown	87	1/3	3 97		
3	3/4 Grantville C da	183	4	7 33		
5	4/4 Piedmont da	274	6	12 89		
2	4/4 Conestoga W da	93	5/8	5 14		
1	Elkton D Pro Canton	72	6	4 32		
	over			108 77		426 91

		over		108	77	426 91
1	pc Ellerton & Canton	57½	9	5	18	
1	" " W da	50½	14	7	07	
1	" " J Bleach	74¾	7	5	23	
1	" " E da	56¾	9½	5	39	
1	" " W da	53¾	16	8	60	
3	Cases 1 Bale Coop & Cartage			1	50	141 74
	Aug 29th & Mar Oct 1st					
1	H Hamilton Mixture	52½	10	5	25	
1	Del Beige	53¾	10	5	38	
2	Super Cashmere	107½	12½	13	43	
2	Arlington & Gordon	109	20	21	85	
1	Fcy Stripe da	54	18	9	72	
1	Blue da	54	18	9	72	
1	Cashmere	225/8	37½	84	70	
1	Fcy Stripe Flannel	29½	37½	11	06	
2	Andalusia Lindsey	95½	15	13	84	
1	J30 Velvet	38	35	13	30	
1	J0 da	34	22½	7	65	
1	Sussex Jersey	35	16½	5	78	
1	Branchville da	45	12½	5	66	
1	Canton Twist	46½	15	6	98	
1	Peninsula Jersey	39¾	30	11	93	
2	Baltimore da	59½	40	23	80	
1	Dockings da	29½	50	14	63	
1	Continental Cassimere	36½	40	14	60	
1	Pequea da	41¾	50	20	88	
2	Jefferson Jersey	68½	22½	15	34	
2	Imperial Repellant	57⅞	65	37	62	
1	McKeown Tweed	32½	25	8	13	
1	Dockings Cassimere	28	50	14		375 23
	August 28th & Mar Oct 1st					
1	Dz Underbodies Corset			4	50	
1	Champion & Shirts			9		
1½	Curlene Underwaists		900	13	50	
1	Delight Collars			1		
4	lbs Ball Cotton		27	1	08	
3	Mch		75	2	25	
3	da		100	3		
100	Dz Coats Cotton		55	55		
	Coop & Cartage				35	
	Ins to Ports ½ on 100				20	89 88
			Forwd			1033 76

JOHN E. HURST.
LITTLETON B. PURNELL. WM. E. CLARKE.
LLOYD L. JACKSON. WM. B. HURST.

5 percent off, if paid within 10 days | 4 months
" 30 "

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Baltimore, _____ 188

Mr R S Joyner
Edenton

BOUGHT OF

HURST, PURNELL & Co.

IMPORTERS & JOBBERS OF

DRY GOODS, NOTIONS & WHITE GOODS.

SPECIAL ATTENTION CALLED TO NOTICE AT TOP.

HOPKINS PLACE,
COR. SHARP, GERMAN & LIBERTY STS.

A. MOHR & CO., BALTIMORE.

		Forward				103376
		Oct 5 1886 6 mos				
2		Nathey Drill	97 6		582	
2		Indian Cashmere	108 5		595	
1		Super do	53 12		642	1819
		November 5 1886 6 mos				
2		pcs R R Drill	100 7		700	
		Coop Cart			38	738
		November 5 1886 4 Mos				
1		White flannel	36 15		548	
1		do	28 25		713	
1		3/4 do	37 30		1118	
1		Red do	54 18		626	
1		do Ex	33 27		754	
1		4/4 do P.L.	34 35		1190	
1		Red Twilleds	53 20		1075	6024
						111957
		Credits				
1886						
May	14	By Mdse			475	
July	20	"			43	
Sep	15	" Cash			35	
	24	" "			4157	
	23	" Mdse			465	
Nov	16	" Cash			12658	
	13	" Mdse	4 mos		1330	
	26	" Cash			9519	
Dec	7	" "			10010	
1887	1	" Mdse			481	
Jany	3	" Cash			5675	
	22	" Mdse	6 mos		829	
	22	" "	4 mos		10710	59432
		Balance av Due Jany 8th				52525
		Int to Jany 28d				205
		Credit ass'l 9/87 By Cash Trustee				52730
						461.42