

1899-18

Southampton County Chancery - Jones, Robert S. vs Jones, Edie (Urguhart)

divorce

Jones

is } Bill

Jones

1900. 2nd. Sept. Rules filed

L.A. Gay bks.

Wm. J. Hand p.g.

To the Honorable A. A. Prentiss Judge of the
Circuit Court of Southampton Co Va

In chancery

Therewith complaining your orator Robert S.
Jones sheweth unto your honor that on
Sept 23. 1886 he was married in the
aforesaid County to Edie Wughart. as
will more fully appear by a copy of
the marriage license & return thereon
with filed. marked exhibit No 1 & proved
to be read as a part of this bill
That your orator, is an industrious
hard working man, and took his wife
with pride to the home that he had
prepared for her, and endeavored to make
her comfortable. Contented & happy. by being
a loving & considerate husband & by giving
his time & means to secure a good
support & living for her & during all the time
she lived with him. he continued to
do so. after but a short married
life your orator was called to the
beside of his sick mother in Georgia,
and had to stay with & support & look for
her for some few ^{5 or 6} months. and when
he returned home expecting to find
a loving wife glad to welcome
him he on contrary found that
she, utterly forgetful of him & her

marriage vows & honor, had gone to live
with another man. and since that
time has never lived with your
~~brother~~. but has abandoned & deserted
him and has been guilty of repeated
acts of adultery for she has been
and is now living with another
man - one Charles Briggs & has ^{had} several
children since leaving your brother
none of which are his. but which
your brother truly believes are the
children of his paramour. Chas
Briggs. She has no children by your brother
In tender consideration whereof &
inasmuch as your brother is without
relief. Doe in a Court of equity where
such matters are alone cognizable
he therefore prays that the said Edie
Jones may be made a party defen-
dant to this bill & required to make
a full & perfect answer to the allega-
tions therein contained. or if she
had been therein more fully &
specially interrogated, and that your
brother may be entirely divorced
from her. and the marriage be
dissolved. and that the Court would
grant all such other & further relief

as his case may require and to
equity seems meet. And as in duty
bound your orator will ever pray
may it so please the Court

Robert D. Jones
By Mr Shands his atty

Mr Shands p.p.

Jones

85 { Copy. Ma. Li:

Zirgubart

Ex. "No. 1."

1886

Recorded Page 60.

MARRIAGE LICENSE

Virginia, Southampton Co to wit:

To any Person Licensed to Celebrate Marriages:

You are hereby authorized to join together in the Holy State of Matrimony, according to the rites and ceremonies of your Church, or religious denomination, and the laws of the Commonwealth of Virginia,

Robert S. Jones
and Eddie Vergahart

Given under my hand, as Clerk of the County Court
of Southampton Co this 20th day of Sept 1886
J. B. Prince Clerk.

CERTIFICATE TO OBTAIN A MARRIAGE LICENSE,
TO BE ANNEXED TO THE LICENSE, REQUIRED BY SECTION 2229 OF THE CODE OF VIRGINIA, AS AMENDED BY ACT OF FEBRUARY 3, 1900.

Time of Marriage, ...	Place of Husband's Birth, <u>Southampton</u>
Place of Marriage, <u>Southampton Co</u>	Place of Wife's Birth, ...
Full Names of Parties Married, <u>Robt S Jones</u>	Place of Husband's Residence, ...
<u>Eddie Vergahart</u>	Place of Wife's Residence, ...
Color, <u>W. L</u>	Names of Husband's Parents, ...
Age of Husband, <u>41</u> years	Names of Wife's Parents, <u>P. T. Vergahart</u>
Age of Wife, <u>21</u> "	Occupation of Husband, <u>Farmer</u>
Condition of Husband (widowed or single or divorced)	
Condition of Wife (widowed or single or divorced)	

Given under my hand this 20th day of Sept 1886
J. B. Prince Clerk.

Certificate of Time and Place of Marriage.

I, _____ of the _____
Church, or religious order of that name, do certify that on the 23rd day of
September 1886, at my residence, Southampton Co Va, under authority of the above
License, I united in Marriage the persons named and described above and authorized
of the annexed License.
Given under my hand this _____ day of _____ 19____
H. L. Smith

The Minister celebrating a marriage is required, within two months thereafter, to return the License to the Office of the Clerk who issued the same, with an endorsement thereon of the FACT of such marriage, and of the TIME and PLACE of celebrating the same.

Recd. by Lett. J. A. Gay D.C.

Jones
23 } Final Decece
Jones

To be entered
Oct Term 1900
Oct 2
Robert R. Paulis

Entered
323

Robert S Jones
vs 3 Divorce
Eddie Jones

This day this cause
came on to be heard on the bill and
exhibits and depositions of witnesses,
the defendant on whom process had been duly served still
failing to appear, and plead, answer or demur,
and was argued by counsel. On
consideration whereof the court doth
adjudge order & decree, that the
marriage heretofore had & solemnized
between the plaintiff Robert S. Jones
and the defendant Eddie Jones
formerly Eddie Virgibart, shall be
and the same is hereby dissolved,
and that the said Robert S.
Jones be forever divorced from
the said Eddie Jones, and there
appearing nothing further to be
done in this cause, ordered that
that the same be removed
from the docket

Jones

rs } costs

Jones

Jones R. S.

vs. } Stat: of costs

1900

Jones Edie

Sept. 4th

Sum. 25. 1 cop. 13. receipt 18. atty. 10 = 66

Docket 18. Rules 1.00. return 35. fil. bill 15 = 1.68

D. Ex. 15. D. Depositions 15. Cop. Ex 50 = 80

replication 15. Deem 36. Tax costs 40 = 91

fil. away papers 25 = 25

to look 4.30.

shff. 50

Law 12.16.50

21.30

Jones

vs 3 Summons

Jones

I hereby certify that
I executed the within

Summons on Sept 8

1900 by leaving a copy

of same with Edna

Jones P. E. Foster

My self
for J. M. Williams
Sheriff

THE COMMONWEALTH OF VIRGINIA,

To the Sheriff of Southampton County--Greeting:

We command you to summon Edie Jones

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 25 Monday in Sept. 1900 next, to answer a bill in Chancery exhibited against her in our said Court by Robert S. Jones

And this she shall in no wise omit under penalty of law. And have then there this writ.

WITNESS, L. A. GAY, Clerk of our said Court, at the Courthouse, this 4th day of September, 1900, in the 12th year of the Commonwealth.

Teste: L. A. Gay C. C.

~~A Copy~~ Teste: C. C.

Jones

vs { Stat: of Rules

Jones

Robert S. Jones

Plaintiff

vs.

Eddie Jones

Defendant

1900. 4th September. Process issued to 2nd Sept. Rules

1900. 2nd. Sept. Rules. Process returned executed

Bill and exhibits filed

Deere nisi vs. defendant

1900. 1st. Oct. Rules. Bill taken for confessed

and cause set for hearing

James Robert S.

23 Notice

James Edie

I hereby acknowledge receipt of service of

the within notice. Given under my

hand this 8 day of Sept. 1908 ^{my} Edie & James

mark.
J. E. Smith

To Edie Jones

I hereby notify you
that on September 12th 1900 at Boykins
Va I propose to take according to
law the deposition of Edgar B. Beeton
and others to be read as evidence
in my behalf in a certain suit
in equity pending in the Circuit
Court of Southampton Co. Va. wherein
I am plaintiff, and you are defendant
do not. And if from any cause the
of said deposition is not completed
that day, same will be continued
from day to day till they are

Very respectfully
Sept. 4th 1900 Robert S. Jones

By his Counsel
Wm. Shand

Jones

23 Depositions

Jones

1900 19th Sept. Filed

L. A. Gay L.L.

The depositions of E. B. Beaton others
taken before Geo. H. T. Ridley a Justice
of the Peace for Southampton Co Va. at
my office in the town of Boykins in
said County on the 12th day of Sept
1900. pursuant to notice letters attached
to be read as evidence in behalf of
R. S. Jones plaintiff in a suit in equity
pending in the Circuit Court of
Southampton Co Va. under the style
of Jones vs Jones.

The witness H. T. Felts being duly sworn
deposes and says as follows

1. Q Side your age, residence, occupation
and do you know the parties to this
suit

1. A 55 yrs old. reside near Boykins in
Southampton Co Va. an agriculturist and know
the parties to this suit

2. Q Do you know whether or not Edie
Jones is now living with her husband
R. S. Jones. if not where does she live?

4. A Yes, ^{she} is not living with him, but is
living near Boykins Va. and is
said to be living with mother

man. and has several children. and
I am certain A. D. Jones is not the
father of them, for she has not
lived with him for several
years. In fact some few months
after they were married Jones went
to see his mother, who lived
in Ga, and who was quite sick. he
staid some 6 months and when
he came back he found her
living with another man and
they have not lived together
since. Jones is a very good man
and took good care of her as long as
she lived with him. and further
this deponent says with not
signed - H. J. Falls
Mark

The witness E. B. Beaton being
duly sworn deposes and says as
follows

I am 54 yrs old. am Postmaster at
Boykins Ga, and former, and know
the parties to this suit very well

1 2 Do you know whether the parties to
this suit and whether they are now

living together or not?

Q

Ans They are not living together. The woman is living near Boykins Va & has not lived ^{with} Jones but a very short time after they were married she is now living with one ~~another~~ Charles Briggs & has several children all born since she left Jones and none of them I am certain ~~none of them~~ are Jones. Jones bears as good a reputation as any colored man I know of & is a hard working industrious man well thought of by both white and colored. And further this deponent doeth not
signed

E. B. Beaton

The witness B. E. Felts being sworn deposes and says as follows
I am 29 years old. am former. reside ~~near~~ Boykins Va, and know the parties to this to this suit very well

2.

Do the parties to this suit now live together, if not where do

they live

a

They do not live together. R. S. Jones
lives on his own land near
Branchville Va. is a hard working
industrious man. has a good
reputation is a carpenter of some
his wife lives near Boykins Va
with another man Charles Briggs
she admitted to me that she
lived with him some as husband wife
she has several children. and
Briggs told me the children
were his; Jones has not lived
with her since he came back
from Va and found her living
with another man. she told me
this, and I know this to be true
Jones is well liked and well thought
of by all who know him.
and all who know him hope he
may be freed from such a wife. and
further this deponent doeth not
Signed B. E. Fetter

Boykins Southampton Co Va

September 12. 1900

J. N. T. Ridley a justice of the peace

for said County do hereby certify
that the above dispositions of N.W.
Tells. E.B. Beaton & B.E. Tells were
taken before me this day in
my said County pursuant to
the notice hereto attached and
for the purpose therein stated. I
further certify that the said
witness are prominent citizens of
said County and that I also
know of the facts which they
testify of, and that their state-
ments are correct. Given under
my hand this 14th day of Sept 1900

A.T. Ridley J.P.