

1909-009 Chancery Causes, Richard Raynor Turner vs Helen Nelson Early Turner
Isle of Wight County

65

other surnames: Lane,
Stott, Early

Copy of Exhibit B.

Shoalbay Va.

Sept. 10, 1906.

Dear Helen;

My home is the proper place for you, and as your husband,
I command you, to return at once.

Your true husband,

R. R. Turner.

Sep. 10th

Sept. 10/06

W. E. Lunde

G. W. Morris,

Witness.

Witness

COPY

Copy of Exhibit C.

" Bedford City,

Sept. 7, 1906.

Dear Ray:

No doubt you have been expecting a reply from your letters, but I have delayed in order to satisfy my self as to whether I would return to you again.

I must say in the outset that your letters have been any thing but encouraging to a sick wife away from her husband's home.

You know what our life has been for the past 2-1/2 years and I see no prospects for a more pleasant one in future.

When I came up here I expected to return to Isle of Wight, and so stated the fact to my sisters, but after staying away from you and enjoying the quiet and love of a Fathers home I have decided to make my home here. It is hard for a wife to have to take such a stand, but my future happiness depends on this stand.

I have not made up my mind in a minute. It has been after weeks of thought.

I have made up my mind fully and determinidly on this subject, so Ray you need not worry after me any more or try to make any fair promises for I will not accept any.

As to my trunk and other things that I have in your house I will make arrangements later as to getting them to Bedford.

You will be responsible for them until I get them from your house. Your father has written things about me to my Father which I know you told him. One thing about my saying I would not take any medicine from him etc.

My Father never knew of any disturbance between us until your father wrote him.

My trip up here, Drs bills, medicine and good nursing have all been given me by my family & you have never given them any thanks, but have abused my sisters in your letters and ordered me home, without offering to pay any of my expenses to your home, but that is alright now for I would not have accepted the money or come either.

-2-

Now I hope your father & mother will be satisfied, for they have always abused me for extravagance & lack of interest & the cause of your not getting along better.

I hope you can prosper in this worlds goods,

Hastily,

Helen Nelson Early Turner."

Copy of Exhibit D

Shoalbay Va.

Sept. 18, 1906.

Dear Helen;

I am in receipt of your letter, of the 7th inst. and am utterly surprised and deeply grieved, and almost heartbroken at your determination never to live with me again as stated in your letter; after reading & rereading your letter, I do not know what to say or do, except your determination to leave me, is your fault. I have been to you a kind & faithful husband.

Your true husband

R. B. Turner.

We the undersigned do certify that this is the true copy of this letter that R. B. Turner sends to Helen Turner Sept. 18, 1906.

Maggie J Turner

Alice G. Stott

C. W. Morris

Exhibit A.

MARRIAGE LICENSE

Virginia, Bedford County, to-wit:

To any Person Licensed to Celebrate Marriages:

You are hereby authorized to join together in the Holy State of Matrimony, according to the rites and ceremonies of your Church, or religious denomination, and the laws of the Commonwealth of Virginia, Richard R. Turner and Helen M.K. Early.

Given under my hand, as Clerk of the Circuit Court of Bedford County, this 8th day of March, 1904.

John M. Speece, 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, March 9th., 1904	Place of Husbands Birth Isle of Wight County Va.
Place of Marriage, Bedford County Va.	Place of Wife's Birth Bedford County Va.
Full Names of Parties Married, Richard R. Turner and Helen M.K. Early	Place of Husbands Residence, Isle of Wight County Va.
Color White	Place of Wife's Residence Bedford County Va.
Age of Husband 21 years	Names of Husband's Parents D.W.D. and Sal lie A. Turner
Age of Wife 21 "	Names of Wife's Parents, J. Nathaniel and Helen N. Early
Condition of Husband (widowed or single or divorced) Single	Occupation of Husband Agriculturist
Condition of Wife (widowed or single or divorced) Single.	

Given under my hand this 8th day of March, 1904.

John M. Speece, Clerk.

Certificate of Time and Place of Marriage.

I, Edward E. Lane, a Minister of the Presbyterian Church church or religious order of that name, do certify that on the ninth day of March 1904, at Bedford City, Va., under authority of the above License, I united in Marriage the persons named and described therein.

Given under my hand this ninth day of March 1904.

Edward E. Lane.

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.

A Copy Teste;

W. M. Bolling Clerk.

Turner, Richard R.,

and  Copy Marriage
License.

Helen R. K. Early.

Fee .30
Postage .02

This card must be neatly and correctly made up and addressed at the post office where the article is registered.

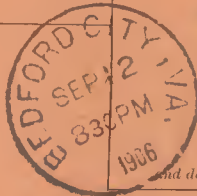
The postmaster who delivers the registered article must see that this card is properly signed, postmarked, and mailed to the sender.

Postmark of Delivering Office

Post Office Department.

OFFICIAL BUSINESS.

Penalty of \$300 for private use.



RETURN TO:

Name of Sender, _____

Street and Number, }
or Post Office Box. }

Post Office at _____

County _____, State _____

and date of Delivery.

Shoalbay

7/11

Exhibit B

REGISTRY RETURN RECEIPT.

Form No. 1548.

Received from the Postmaster at

Buffalo City - 7/4
(Delivering office.)

Registered {Letter} {Parcel} No.

9

from

Shoolbrey
(Office of origin.)

Addressed to

Mrs R. R. Turner
(Name of addressee.)

Date

Sept 12, 1906
(Date of delivery.)

When delivery is made to an agent of the addressee, both addressee's name and agent's signature must appear in this receipt.

Mrs R. R. Turner
(Signature or name of addressee.)

(Signature of addressee's agent.)

A registered article must not be delivered to anyone but the addressee, except upon the addressee's written order. When the above receipt has been properly signed, it must be postmarked with name of delivering office and actual date of delivery and mailed to its address, without envelope or postage.

Exhibit B.

Shoalbay Va.

Sept. 10, 1906,

Dear Helen;

My home
is the proper place
for you, and as your
husband. I command
you, to return at once
your true husband
R. R. Turner.

Sept 10

Sept 10/06

McKenna - Geomorph

Musup - Titus

Exhibit B.

Sept 10th

R R Turner to

Helena W Turner

Exhibit C.

Bedford City.

Sept. 7, 1916.

Dear Ray:

No doubt you have been expecting a reply from your letters, but I have delayed in order to satisfy my self as to whether I would return to you home again.

I must say in the outset that your letters have been any thing but encouraging to a sick wife away from her husband's home.

You know what our life has been for the past 2½ years and I see no prospects for a more pleasant one in future.

When I came up here I expected to return to Oak of night, and so stated the fact to my sisters, but after staying away from

you and enjoying the quiet
and love of a Father
home I have decided to
make my home here.

It is hard for a wife
to have to take such a
stand, but my future
happiness depends on this
stand.

I have not made up my
mind in a minute. It
has been after weeks of
thought.

I have made up my mind
fully and determinedly on
this subject, so Ray you
need not worry after me
any more or try to make
any fair promises for I
will not accept any.

As to my trunk and other
things that I have in your
house I will make arrange-
ments later as to getting

them to Bedford.
You will be responsible
for them until I get
them from your house.
Your father has written
things about me to my
Father which I know you
told him. One thing about
my saying I would not
take any medicine from
him etc.

My Father never knew of
any disturbance between us
until your father wrote
him.

My trip up here, Drs bills,
medicine and good nursing
have all been given me
by my family & you have
never given them any thanks,
but have abused my sisters
in your letters and ordered
me home, without offering

to pay any of my expenses
to your home. but that
is alright now for I would
not have accepted the money
or come either.
Now I hope your father
& mother will be satisfied.
for they have always abused
me for extravagance & lack
of interest & the cause
of your not getting along
better

I hope you can prosper
in this worlds goods.

Hastily.

Helen Nelson (Early) Turner.

From
Mr. R. R. Turner }
22 College St- }
Bedford City, Va }



⑦

298

Exhibit C

Mr. R. R. Turner,
Shoal Bay.

Isle of Night Is., Virginia

Exhibit C



U. S. P. O. Registry Receipt.

Letter
Parcel }

No. 12

P. O.,

Shoalbay 7th

Received for registration

9/14/06

, 190

, from

addressed to

Mrs R R R
Bedford City - 7th

class postage prepaid.

Postmaster, per

7th

This card must be neatly and correctly made up and addressed at the post office where the article is registered.

The postmaster who delivers the registered article must see that this card is properly signed, postmarked, and mailed to the sender.

Post Office Department.

OFFICIAL BUSINESS.

Penalty of \$300 for private use.

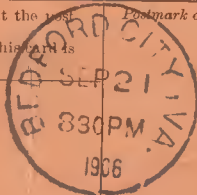
RETURN TO:

Name of Sender, _____

Street and Number, }
or Post Office Box. }

Post Office at _____

County _____, State _____



Postmark of Delivering Office



and date of Delivery

Chick R.

REGISTRY RETURN RECEIPT.

Form No. 1548.

Received from the Postmaster at

Bedford City -
(Delivering office.)

Registered ^{Letter}_{Parcel} No.

12

from

Shovel Bay
(Office of origin.)

Addressed to

Mrs. P. H. Turner
(Name of addressee.)

Date

Sept 27
(Date of delivery.)

, 1906

When delivery is made to an agent of the addressee, both addressee's name and agent's signature must appear in this receipt.

Mrs. P. H. Turner
(Signature or name of addressee.)

(Signature of addressee's agent.)

* A registered article must not be delivered to anyone but the addressee, except upon the addressee's written order. When the above receipt has been properly signed, it must be postmarked with name of delivering office and actual date of delivery and mailed to its address, without envelope or postage.

Shoalbay Va

Exhibit D

Sept. 18, 1906

Dear Helen;

I am in receipt
of your letter, of the 7th inst.
and am utterly surprised
and deeply grieved, and
almost heartbroken at your
determination never to live
with me again as stated
in your letter; after reading
& rereading your letter, I
do not know what to say
or do, except your determina-
tion to leave me, is your fault.
I have been to you a kind &
faithful husband.

your true husband

R. R. Turner.

We the undersigned do certify that this is the true
copy of this letter, that R. R. Turner sends to Helen Turner
Sept 18, 1906
Maggie J. Turner
Alice J. Stott
G. H. Morris

SHORT DAY

Exhibit D.

Exhibit D.

If not called for in 5 days return to

J. N. EARLY,

NOTARY PUBLIC,

Bedford City, Virginia.

Exhibit E.



13

*Dr. W. D. Turner
Ocean View
Virginia*



J. N. EARLY,
NOTARY PUBLIC
WITH SEAL

BOX 375.

Exhibit E

JUSTICE OF THE PEACE

Bedford City, Va.,

Sept 7th 1906

Dr. W. D. Turner
Ocean View Va
Dear Sir

I write to say that
I have decided not to make
my visit to Norfolk as expected
but will go to the Mountains instead
for a trip as soon as the weather
clears up. In regard to the inter-
~~viewer~~ you speak of! While you
have always been welcome in my
home I do not think you would
care to come from your allusion to
Susie. ~~It is more than painful~~
It is more than painful
to me to learn what my daughter
has undergone since she left
a happy and cheerful home

Why all this should have been kept
from me. I am at a loss to know
Helen says she was living in
the hope that Ray would feel
the thing and would turn over
a new leaf. I feel sure
that my daughter has fully
determined not to submit
any longer to the yoke and
what a shame that a young &
^{happy} vigorous life should be wrecked
in such a way. I do not feel
disposed to write any more
at this time as God only knows
what my trouble is

I rec^d your letter also saw Mr P
concerning the Camp outfit. Susie
says you are in error in regard to the
rats calling the tent. I have not seen
any sign of it! But opening and spreading
them will benefit owing to some dampness

Very truly yours
J. M. Early

D. S. PHLEGAR,
SHORTHAND REPORTER,
NORFOLK, VA.

EXHIBITS IN CASE OF
RICHARD RAYNOR TURNER v. HELEN NELSON EARLY TURNER.

VIRGINIA:

IN THE CIRCUIT COURT OF ISLE OF WIGHT COUNTY.

On the _____ day of October, 1909.

RICHARD RAYNOR TURNER,	Complainant,	))) DECREE.
vs.		
HELEN NELSON EARLY TURNER,	Defendant.	

This cause came on this day to be heard on the bill of complaint and the exhibits filed therewith, and on the deposition taken before Robert W. Shultice, a Commissioner in Chancery of the Circuit Court of the City of Norfolk, State of Virginia, and was argued by counsel for the plaintiff.

On consideration whereof, the court being of opinion that the charge of wilfull desertion on the part of the defendant, Helen Nelson Early Turner, for more than the statutory period of three years, to-wit: since the 24th day of July, 1906, made in the bill, is fully established by the evidence, doth adjudge, order and decree that the marriage heretofore solemnized between the said plaintiff, Richard Raynor Turner and the said defendant, Helen Nelson Early Turner on the 9th day of March, 1904, at Bedford City, Virginia, by Rev. Edward Lane, Pastor of the Presbyterian Church at said Bedford City, Virginia, be and the same is hereby annulled, and the said plaintiff, Richard Raynor Turner is granted an absolute divorce from said defendant, Helen Nelson Early Turner.

And said defendant having indicated a desire to retain the custody and control of the child which was born to her at Bedford City, Virginia, on the 23rd day of October, 1906, and her father, to-wit: J. N. Early, having given to the court satisfactory evidence of his ability and willingness to support said child, and give to it such educational advantages as may be suit-

able and proper, without expense to said plaintiff, Richard Raynor Turner, it is further adjudged, ordered and decreed that said child shall remain in the custody and control of said defendant, Helen Nelson Early Turner until it has reached lawful age.

Nothing remaining to be done in this cause, it is ordered that it be removed from the docket.

The Commonwealth of Virginia,

To the Sheriff of the County of ^{Bedford} ~~Isle of Wight~~, Greeting:

WE COMMAND YOU that you summon Helen Nelson Early
Turner

to appear at the Clerk's office of the Circuit Court of the County of Isle of Wight
at the rules to be held for the said Court, on the 3rd Monday in August 1909,
to answer a bill in chancery, exhibited against her in our said court for
by Richard D. Paymor Turner

And have then there this writ. Witness A. S. Johnson ~~NATHANIEL F. YOUNG~~, Clerk of our said court, at
the court-house, the 17th day of July 1909, and in the 21st ~~34th
year of the Commonwealth.~~

Teste A. S. Johnson
Aug 11

Richard R. Turner

vs.

}

SUBPOENA
IN
CHANCERY.

Helen N. E. Turner

J. T. Lawton

p. 9

To 2nd August Rules,

Circuit Court.

July 23rd 1909, B 3119 Executed on
Helen N. E. Turner by de-
livering to J. N. Early, her
father & a member of her
family, over the age of
16 years, at his residence
in Bedford County a true
copy of this within was
& explaining the purpose &
threat. To him she not being
found at her usual place
or abode J. N. Early, D. S.
by P. L. Ladd, D. S. 5 136

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

RICHARD RAYNOR TURNER,
Complainant,

vs.

HELEN NELSON EARLY TURNER,
Defendant.

C. C. B. No. 6, page 626.

DECREE.

*We have seen within
decree and have no
objection to same.
Sale & Witness Atty
for Helen Nelson Early Turner.*

*1909
Feb. 4
Entered this
J. D. W.*

VIRGINIA:

County of Bedford, to-wit:

I, J. N. Early, a resident of Bedford City, County of Bedford, State of Virginia, being first duly sworn, say that I am the father of Helen Nelson Early Turner, the defendant in a certain suit in chancery now depending in the Circuit Court of Isle of Wight County, Virginia, in which her husband, Richard Raynor Turner, is plaintiff, in which he prays for an absolute divorce; that there was born to said Helen Nelson Early Turner on the 23 day of October, 1906, at my home a certain man child; that my said daughter, Helen Nelson Early Turner, is desirous of retaining the sole and absolute control and custody of said child, and that I am able and willing to provide for it a home in my family and to give it such educational advantages as its station in life would make proper; and that I am willing and able, and do hereby agree so to do in consideration of said child being placed in the absolute custody and control of my said daughter, Helen Nelson Early Turner, without expense of any sort upon the part of said Richard Raynor Turner.

Given under my hand and seal this 1st day of September 1909.

J. N. Early (Seal)

STATE OF VIRGINIA,

County of Bedford, to-wit:

I, Nelson Sale, a Notary Public in and for the County and State aforesaid, certify that J. N. Early, whose name is signed to the foregoing affidavit, personally appeared before me, in my County aforesaid, and being first duly sworn, made oath to the same.

Given under my hand this 1st day of September 1909.
My commission expires on the 9th day of August 1913.

Nelson Sale
Notary Public.

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

RICHARD RAYNOR TURNER,
Complainant,

vs.

HELEN NELSON EARLY TURNER,
Defendant.

Affidavit of
J. N. Early.

Filed Oct 4/1909
Dist. Attorney
Earl

RICHARD RAYNOR TURNER,

v.

HELEN NELSON EARLY TURNER.

Depositions.

INDEX.

[illegible]

1 IN THE CIRCUIT COURT OF ISLE OF WIGHT COUNTY.

2
3 -----
4 RICHARD RAYNOR TURNER, *

5 v. *

Depositions.

6 HELEN NELSON EARLY TURNER. *

7 -----
8
9 The depositions of Richard Raynor Turner, and others,
10 taken before me, R.W.Shultice, a Commissioner in Chancery
11 for the Circuit Court of the City of Norfolk, pursuant to
12 notice hereto attached, at the office of J.T.Lawless, No.
13 525 Seaboard Bank Building, Norfolk, Virginia, August 25th,
14 1909, to be read as evidence on behalf of the plaintiff in a
15 certain cause now pending in the Circuit Court of Isle of
16 Wight County, wherein Richard Raynor Turner is plaintiff, and
17 Helen Nelson Early Tuner is defendant.

18
19 PRESENT:

20 J.T.Lawless, Esq., for the plaintiff.

21 No appearance for the defendant.

22
23 -----oOo-----

24 D.S.Phlegar,
25 Shorthand Reporter,
26 Norfolk, Virginia.

1 RICHARD RAYNOR TURNER, the plaintiff, being duly
2 sworn, deposes and says as follows:
3

4 Examined by Mr. Lawless:

5 Q. Please state your name, age, and residence?

6 A. Richard Raynor Turner; twenty-six years old; Shoal
7 Bay, Virginia.

8 Q. Is that in the county of Isle of Wight?

9 A. Yes, sir.

10 Q. How long have you lived there?

11 A. Ever since I was born.

12 Q. Are you the plaintiff in this suit? A. Yes, sir.

13 Q. When were you married?

14 A. The 9th of March, 1904.

15 Q. To whom? A. Helen Nelson Early.

16 Q. Where were you married? A. In the Presbyterian
17 Church, Bedford City, Virginia.

18 Q. By whom? A. Mr. Lane.

19 A. Where have you resided since the time of your marriage?

20 A. Shoal Bay, in Isle of Wight County.

21 Q. In other words, as I understand, you were born in
22 Isle of Wight County, lived there all of your life?

23 A. Yes, sir.

24 Q. You were married in Bedford City, Virginia, on the
25 9th of March, 1904? A. Yes, sir.

26 Q. You removed to Isle of Wight County with your wife,

1 and continuously resided there until the present time?

2 A. Yes, sir.

3 Q. Is your wife now living with you?

4 A. No, sir.

5 Q. Where is she? A. I suppose in Bedford City.

6 Q. When did you last see her?

7 A. The 24th of July, 1906.

8 Q. Did she leave your home at that time?

9 A. Yes, sir.

10 Q. Has she ever returned to it since?

11 A. No, sir.

12 Q. Has she ever, in writing, refused to return to your
13 home?

A. Yes, sir.

14 Q. Have you ever made a demand upon your wife to return
15 to your home?

A. Yes, sir.

16 Q. As being the proper place for her?

17 A. Yes, sir.

18 Q. In paragraph five of the bill filed by you against
19 your wife, you state that on the 10th day of September,
20 1906, you wrote her a letter, which you had registered,
21 and mailed at the Post Office of Shoal Bay, Virginia, a
22 copy of which I now hand you, and the original of this
23 letter, you state in your bill, was filed as an exhibit
24 with the bill and marked exhibit B. Please read the copy
25 of the letter which I hand you, and state whether or not
26

1 that is a true copy of the letter referred to?

2 A. This is a true copy.

3 Q. Please read the letter to the stenographer?

4 A. Shoal Bay, Va.,
5 Sept. 10, 1906.

6 Dear Helen:

7 My home is the proper place for you, and as
8 your husband, I command you, to return at once.

9 Your true husband,

10 R.R.Turner.

11 Sep.10th

Sept.10/06

12 W.E. Howle

G.W.Morris,

13 Witness

Witness.

14 Q. Did you ever receive an answer to that letter?

15 A. No, sir, I did not receive an answer to that letter.

16 Q. In paragraph six of your bill of complaint you aver
17 that on the 10th day of September, 1906, you received a
18 letter dated September 7th, 1906, from your wife sent to
19 you from Bedford City, Virginia, and received by you at
20 Shoal Bay, Isle of Wight County, Virginia, in which she
21 notified you she had made up her mind fully and determinidly
22 never to live with you again, and that you file the original
23 of that letter with your bill of complaint, and mark it
24 exhibit C. I hand you a copy of that letter, and ask you
25 to identify it as being a true copy of the original filed
26

1 with the bill, and read it to the stenographer?

2 A. It is a true copy.

3 Bedford City,
4 Sept.7,1906.

5 Dear Ray:-

6 No doubt you have been expecting a reply from
7 your letters, but I have delayed in order to satisfy
8 myself as to whether I would return to you again.

9 I must say in the outset that your letters have
10 been anything but encouraging to a sick wife away
11 from her husband's home.

12 You know what our life has been for the past
13 2-1/2 years and I see no prospects for a more
14 pleasant one in further.

15 When I came up here I expected to return to
16 Isle of Wight, and so stated the fact to my sisters,
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18 quiet and love of a father's home I have decided to
19 make my home here. It is hard for a wife to have
20 to take such a stand, but my future happiness de-
21 pends on this stand. I have not made up my mind
22 in a minute. It has been after weeks of thought.

23 I have made up my mind fully and determinidly
24 on this subject, so Ray you need not worry after me
25 any more or try to make any promises for I will not
26 accept any.

27 As to my trunk and other things that I have in
28 your house I will make arrangements later as to
29 getting them to Bedford. You will be responsible
30 for them until I get them from your house. Your
31 father has written things about me to my father
32 which I know you told him. One thing about my say-
33 ing I would not take any medicine from him, etc.

34 My father never knew of any disturbance between
35 us until your father wrote him.

36 My trip up here, Drs. bills, medicine and good
nursing have all been given me by my family & you
have never given them any thanks, but have abused my
sisters in your letters and ordered me home without
offering to pay any of my expenses to your home,
but that is alright now for I would not have accepted

1 the money or come either.

2 Now, I hope your father & Mother will be
3 satisfied, for they have always abused me for
4 extravagance & lack of interest & the cause of your
5 not getting along better.

6 I hope you can prosper in this worlds goods,

7 Hastily,

8 Helen Nelson Early Turner.

9 Q. Were the letters you sent to her registered in the
10 Post Office at Shoal Bay, or not?

11 A. Yes, sir, they were registered.

12 Q. Did you receive the usual receipts, which accompany a
13 registered letter, signed by her?

14 A. Yes, sir.

15 Q. You have filed, as you aver in your bill of complaint,
16 the original of those receipts with the bill of complaint?

17 A. Yes, sir.

18 Q. Mr. Turner, have you ever given your wife any cause to
19 desert you in the manner which you have stated?

20 A. No, sir, none whatever.

21 Q. Has she ever given you any reason for her desertion
22 from you except as contained in the letters you have filed?

23 A. No, sir.

24 Q. As I understand it you have never seen her from that
25 day to the present?

26 A. No, sir, I have
never seen her.

1 Q. Do you know whether or not her father has also, in
2 writing, stated that she would never live with you again?
3

4 A. Yes, sir, he wrote that.

5 Q. Have you ever seen that letter?

6 A. Yes, sir.

7 Q. Do you know where it is now?

8 A. No, sir, I don't know where it is now.

9 Q. To whom was the letter addressed?

10 A. I think addressed to my father.

11 Q. Was any child born as the result of your marriage?

12 A. I have heard there was a child born.

13 Q. You have heard there was a child born?

14 A. Yes, sir.

15 Q. Do you know where the child was born?

16 A. I do not know. I heard in Bedford.

17 Q. You have never seen that child? A. No, sir.

18 Q. Do you, or not, make any claim for that child?

19 A. No, sir.

20 Q. Have you ever heard from your wife, since the letter
21 marked exhibit C, which was dated September 7th, 1906?

22 A. No, sir, I have never heard from her since.

23 Q. When you received the letter dated September 7th, 1906,
24 and marked exhibit C, did you answer that letter?

25 A. Yes, sir.

26 Q. I hand you a copy of the original, which you say was

1 filed with the bill of complaint, marked exhibit D,
2 and ask you to identify it and read it to the stenographer?

3 A. Yes, sir, this is it.

4 Shoal Bay, Va.,

5 Sept. 18, 1906.

6 Dear Helen:

7 I am in receipt of your letter of the 7th inst.
8 and am utterly surprised and deeply greaved and
9 almost heartbroken at your determination never to
10 live with me again as stated in your letter; after
11 reading and rereading your letter, I do not know
12 what to say or do, except your determination to
13 leave me is your fault. I have been to you a kind
14 & faithful husband.

15 Your true husband,

16 R.R.Turner.

17 We the undersigned do certify that this is the true
18 copy of this letter that R.R.Turner sends to Helen
19 Turner, Sept.18, 1906.

20 Maggie J.Turner
21 Alice G.Stott
22 G.W.Morris.

23 Richard R. Turner

24 -----c0o-----
25
26

1 DR. W. D. TURNER, being duly sworn, deposes and says as
2 follows:

3 Examined by Mr. Lawless:

4 Q. Please state your name, age and profession?

5 A. William Danridge Turner; fifty years old; physician.

6 Q. Where do you reside?

7 A. Isle of Wight County, sir, Shoal Bay.

8 Q. How long have you resided there?

9 A. In Isle of Wight about forty years, I guess.

10 Q. Are you the father of the plaintiff in this suit?

11 A. Yes, sir.

12 Q. How long has he resided there?

13 A. Ever since he was born.

14 Q. Does he still reside there? A. Yes, sir.

15 Q. Do you remember his marriage to Miss Early of Bedford
16 County? A. I do.

17 Q. Do you remember the date? A. Yes, sir.

18 Q. When was it? A. The 9th of March, 1904.

19 Q. Where did it take place?

20 A. Bedford City, Virginia.

21 Q. Were you present? A. Yes, sir.

22 Q. State whether or not the plaintiff and the defendant
23 in this suit resided in Isle of Wight County continuously
24 since the date of that marriage, up to the time of the
25 alleged desertion on the 24th day of July, 1906?

26 A. Within a week after their marriage they came to Isle of

1 Wight, and resided there continuously. They were on a trip
2 for a week after their marriage.

3 Q. Did they reside near your home?

4 A. Yes, sir.

5 Q. Was your son able to provide for his wife?

6 A. Yes, sir.

7 Q. Did he provide for her? A. Yes, sir.

8 Q. In what business was he engaged during the time of his
9 marriage?

A. Farming.

10 Q. Do you know of any reason why his wife should have desert-
11 ed him, in the manner alleged in the bill of complaint?

12 A. No, I do not know why she deserted him.

13 Q. Was there any reason, so far as you were advised, why
14 she should have gone off and left him, in the manner that
15 she did?

A. Absolutely none, at the time.

16 Q. So far as you know had he been a good, true and faithful
17 husband to her?

A. Two years I think he
18 had been an extraordinarily good, faithful and true husband.

19 Q. Do you know whether or not she took her belongings with
20 her at the time of her departure in July, 1906?

21 A. Yes, sir, she took them with her.

22 Q. She did take her personal belongings with her?

23 A. Yes, sir.

24 Q. After her desertion of him, in the manner you have re-
25 lated, did you make any effort to reconcile the parties and
26 bring them together again?

A. Yes, sir.

1 Q. What was the result of your effort?

2 A. It was a failure.

3 Q. Did you have any correspondence with her parents?

4 A. Yes, sir, several letters passed between her father
5 and myself.

6 Q. Were you ever informed by her father she had made up
7 her mind fully and determinidly not to live with him any
8 longer?

A. Yes, sir.

9 Q. Have you that written communication with you?

10 A. Yes, sir.

11 NOTE: The letter is produced, and is as follows:

12 Bedford City, Va., Sept. 7th, 1906.

13 Dr.W.D.Turner,
14 Ocean View, Va.,
15 Dear Sir

16 I write to say that I have decided not to make
17 my visit to Norfolk as expected but will go to the
18 mountains instead for a trip as soon as the weather
19 clears up! In regard to the interview you speak
20 of, while you have always been welcome in my home
21 I do not think you would care to come from your
22 allusions to Susie. It is more than painful to
23 me to learn what my daughter has undergone since
24 she left a happy and cheerful home. Why all this
25 should have been kept from me I am at a loss to
26 know. Helen says she was living in the hope that
Ray would feel the sting and would turn over a new
leaf. I feel sure that my daughter has fully de-
termined not to submit any longer to the yoke and
what a shame that a young and happy and vigorous life
should be wrecked in such a way. I do not feel
disposed to write any more at this time as God only
knows what my trouble is.

I received your letter also saw Mr.P. concern-
ing the camp outfit. Susie says you are in error
in regard to the rats cutting the tent. I have not
seen any sign of it! But opening and spreading them
will benefit owing to so much dampness.

Very truly yours,
J.N.Early.

NOTE: The original of said letter is filed Exhibit E

Q. Have these parties lived together since the 24th day of

July, 1906?

A. No, sir.

Q. To your knowledge has young Mrs. Turner returned to Isle
of Wight during that time?

A. No, sir.

Q. Have you ever seen her since that time?

A. No, sir.

Q. How do you fix in your mind the date of her desertion?

A. Because my son came to visit me at Ocean View the day
after she left, which was the 25th of July, 1906.,

Q. Do you know whether or not there was a child born of
this union?

A. I have heard so.

Q. You do not know that of your own knowledge?

A. No, sir.

W.D. Turner

-----oOo-----

MRS. SALLIE A. TURNER, being duly sworn, testified as
follows:

Examined by Mr. Lawless:

Q. Please state your name and place of residence?

A. Sallie A. Turner; Shoal Bay, Isle of Wight County, Virginia.

Q. Are you the mother of R.R. Turner, the plaintiff in this
suit?

A. Yes, sir.

Q. Have you resided in Isle of Wight County all your life?

A. Ever since I was married.

1 Q. Has your son resided there during his entire life?

2 A. Yes, sir.

3 Q. Do you remember the date of the marriage with Miss Early
4 of Bedford City?

5 A. Yes, sir, the 9th of March,
6 1904.

7 Q. Were you present at the marriage?

8 A. Yes, sir.

9 Q. When did they come to Isle of Wight to live?

10 A. The week after they were married.

11 Q. Can you state whether they have lived there continuously
12 until the 24th day of July, 1906?

13 A. Yes, sir, they lived there until then.

14 Q. Did they reside in your neighborhood?

15 A. Yes, sir.

16 Q. Do you know of any reason why his wife should have
17 deserted him, in the manner alleged in the bill of complaint?

18 A. I did not know of any.

19 Q. To all outward appearances what were the relation
20 between the parties?

21 A. They seemed very
22 pleasant and happy.

23 Q. Can you state, Mrs. Turner, of your own knowledge,
24 whether any attempt has been made on the part of the family
25 of your son to reconcile the parties and bring them together
26 again?

A. Yes, sir.

Q. What efforts were made? A. Well, I wrote a
letter myself insisting on her coming home, and having an

1 understanding.

2 Q. To whom did you write that letter?

3 A. To her.

4 Q. Was it written in an affectionate, kind and motherly
5 tone?

6 A. It was as affectionate as I could write
7 to my own child.

8 Q. Did you receive any answer to that letter?

9 A. Never.

10 Q. Do you know whether or not young Mrs. Turner took her
11 personal belongings when she went?

12 A. Everything she could possibly take away she took.

13 Q. Do you know whether or not your son has written to her
14 and commanded her to return to him?

15 A. Yes, sir, he did.

16 Q. Did you see that letter before it was mailed?

17 A. I don't remember seeing it.

18 Q. You only know that from what was stated to you by someone
19 else?

20 A. Yes, sir; I heard about it.

21 Q. Have you ever seen the letter, which he refers to in
22 his bill of complaints, marked exhibit B, in which she states
23 she had fully and determinidly made up her mind not to return
24 to him?

25 A. Yes, sir, I saw that.

26 Sallie A. Turner

-----oOo-----

1 MISS ALICE G. STOTT, being duly sworn, deposes and
2 says as follows:

3 Examined by Mr. Lawless:

4 Q. Please state your name and place of residence?

5 A. Alice G. Stott; Bay Shoal, Virginia.

6 Q. Do you know Richard R. Turner and his wife?

7 A. Yes, sir.

8 Q. How long have you known Richard R. Turner?

9 A. All his life.

10 Q. Can you state whether or not he has been a resident
11 of the Isle of Wight during that time?

12 A. Yes, sir.

13 Q. Is he at present a resident of Isle of Wight?

14 A. Yes, sir.

15 Q. Do you remember the time of the departure from home
16 of his wife, Mrs. Helen Nelson Early Turner?

17 A. Yes, sir.

18 Q. Do you remember the date? A. July 24th. I
19 was not at home at the time, but I know of it.

20 Q. You were not at home at the time?

21 A. No, sir.

22 Q. You don't know of your own knowledge?

23 A. No, sir, not just at the immediate time.

24 Q. Were you a neighbor of the Turner family?

25 A. Yes, sir, that was my home, I lived there.
26

1 Q. Do you remember a letter, a copy of which is marked
2 Exhibit D, which I now hand you, dated September 18th, 1906,
3 which Mr. Richard R. Turner wrote to his wife?

4 A. Yes, sir.

5 Q. Did you read that letter before it was mailed and
6 registered to his wife?

A. Yes, sir.

7 Q. Do you know any reason, Miss Stott, for the desertion,
8 in the manner alleged in the bill, by Mrs. Turner of her
9 husband?

A. No, sir.

10 Q. What was, to all outward appearance, the relationship
11 between the parties during the time you observed it?

12 A. Very kind.

13 Q. Did I understand you lived with them?

14 A. I lived with Dr. Turner.

15 Q. Did you have opportunity to frequently observe the re-
16 lationship between the parties?

A. Yes, sir.

17 Q. Did his wife ever tell you the reason of her desertion?

18 A. No, sir.

19 Q. Have you ever seen her, from the time she left until
20 the present time?

A. No.

21 Q. Can you state whether or not she has ever returned to
22 Isle of Wight County?

A. Not that I know of.

23 Q. Can you state whether or not they have ever lived to-
24 gether as man and wife since that time?

25 A. No, they have not,

26

Alice G. Stott

1 STATE OF VIRGINIA,
2 City of Norfolk, to-wit:

3 I, Robert W. Shultice, a Commissioner in Chancery for
4 the Circuit Court of the City of Norfolk, Virginia, do
5 certify that the foregoing depositions of Richard Raynor
6 Turner, Dr. W. D. Turner, Mrs. Sallie A. Turner and Miss Alice G.
7 Stott were duly taken and sworn to at the time and place,
8 and for the purpose in the caption mentioned, and were sub-
9 scribed before me in my city aforesaid.

10 Given under my hand this ^{26th} day of August, 1909.

11 *Robert W. Shultice*
12 Commissioner in Chancery for the
13 Circuit Court of Norfolk City.

14 Fee \$12.65 -

15 -----oOo-----
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Reported by C. L. N.
Transcribed by J. M. B.
Compared by C. L. N.

STENOGRAPHER'S TRANSCRIPT.

190

In the CLERK'S OFFICE of the
CIRCUIT COURT,
OF THE
COUNTY OF ISLE OF WIGHT

this 28. day of August 1909

These depositions and
exhibits were received -
under seal - opened
and filed

Out of the Court
J. J.

To Helen N. E. Turner:

TAKE NOTICE that on Wednesday the 25th day of August 1909 at the office of J. T. Lawless, attorney at law, No. 525 Seaboard Bank Building, Norfolk, Virginia, between the hours of nine A. M. and six P.M. on that day, I shall proceed to take the depositions of William D. Turner and others, to be read in evidence in my behalf, in a certain cause depending in the Circuit Court of the County of Isle of Wight, Virginia, wherein you are defendant and I am plaintiff; and if for any cause the taking of said depositions be not commenced on that day, or, if commenced, be not concluded on that day, the taking of the same will be adjourned and continued from day to day, or from time to time, at the same place and between the same hours until the same shall be completed.

Given under my hand this 16th day of August 1909.

Richard Raynor Turner

By J. T. Lawless
Her Counsel

*We acknowledge
legal service of
within notice
Sale & Winters Atty.
for Helen N. E. Turner.*

VIRGINIA:

IN THE CIRCUIT COURT OF ISLE OF WIGHT COUNTY.

RICHARD RAYNOR TURNER,	Complainant,)	
	)	
versus	)	BILL
	)	IN CHANCERY.
HELEN NELSON EARLY TURNER,	Defendant.)	

To the Honorable Circuit Court of Isle of Wight County:

Humbly complaining, your complainant, Richard Raynor Turner, respectfully shows unto this honorable court the following case:

1. That he is a citizen domiciled and resident in the County of Isle of Wight, State of Virginia, and ever hath been since his birth, to-wit: for a period of twenty-six years.

2. That on the 9th day of March, 1904, your complainant was lawfully married to Helen Nelson Early Turner, the defendant in this cause, at Bedford City, in the County of Bedford, State of Virginia, by Rev. *Edward S* Lane, pastor of the Presbyterian Church located at said place, as will appear from the certified copy of the certificate of said marriage which is filed herewith, marked Exhibit A, and asked to be read as a part of this Bill.

3. That continuously from the date of said marriage until, to-wit: the 24th day of July 1906, your complainant and the said Helen Nelson Early Turner lived together as man and wife at Shoal Bay in the County of Isle of Wight, State of Virginia.

4. That on or about the day last mentioned, to-wit: the 24th day of July 1906, said Helen Nelson Early Turner left the home of your complainant and proceeded to the home of her father

in said County of Bedford, State of Virginia, your complainant avers and charges for the purpose of wilfully and deliberately and without cause deserting and abandoning your complainant as will hereafter be made more fully to appear.

5. That said Helen Nelson Early Turner continued to reside at the home of her father in said county, as aforesaid, without the consent and against the wishes of your complainant, until the 10th day of September, 1906; whereupon your complainant wrote a letter to said Helen Nelson Early Turner, which he duly stamped with the required United States postage and deposited the same then and there in the United States mail at the post office of Shoal Bay, Isle of Wight, Virginia, plainly and properly addressed to said Helen Nelson Early Turner by her married name, to-wit: "Mrs. R. R. Turner", at Bedford City, Virginia; your complainant before depositing said letter in the United States mail, as aforesaid, having first duly registered the same in the manner and as required by the rules and regulations of the United States Post Office Department.

Your complainant avers that said letter was duly received by said Helen Nelson Early Turner on the 13th day of September, 1906, and was duly receipted for by her, as required by the rules and regulations of the United States Post Office Department concerning registered letters, which original receipt together with a copy of said letter so sent and registered as aforesaid, are filed herewith, marked Exhibit B, and asked to be read as a part of this Bill. Your complainant avers to this Honorable Court that said letter reminded said Helen Nelson Early Turner that her proper place was at the home of her husband and commanded her, as she was in duty bound, to return thereto at once.

6. Your complainant avers and charges that on the 10th day of September 1906, he received from said Helen Nelson Early Turner a letter dated Sept. 7, 1906, in which she notified your

complainant that she had made up her mind "fully and determinedly" not to live with him again, but to make her home thereafter with her father; which letter is filed herewith, marked Exhibit C., and asked to be read as a part of this Bill.

7. Your complainant avers that on the 18th day of September, 1906, he wrote to said Helen Nelson Early Turner in reply to the letter referred to in paragraph six of this Bill, which letter so written by your complainant as aforesaid he duly stamped with the required United States postage, addressed the same plainly and properly to said Helen Nelson Early Turner at Bedford City, Virginia, where she then resided, and duly registered it in accordance with the rules and regulations of the United States Post Office Department. Whereupon your complainant then and there deposited the same in the United States mails in the post office at Shoal Bay, Isle of Wight County, Virginia. Your complainant avers that said letter was duly received by said Helen Nelson Early Turner, a copy of which letter, together with the receipt of said Helen Nelson Early Turner for the original of said copy are filed herewith, marked Exhibit D, and asked to be read as a part of this Bill.

8. Your complainant avers that since the date of his marriage with said Helen Nelson Early Turner he hath ever been a true, tender and affectionate husband; that nevertheless said Helen Nelson Early Turner, though often solicited, has not returned to the house and domicile of your complainant in said County of Isle of Wight, State of Virginia, where she last cohabited with him, since her departure therefrom on the, to-wit: 24th day of July 1906, as hereinbefore set forth, but hath refused and doth continue to refuse to return thereto; and your complainant avers and charges that said Helen Nelson Early Turner has wilfully and deliberately deserted and abandoned your complainant since the, to-wit: 24th day of July, 1906, as hereinbefore set forth, without just cause or reason; that she hath removed and caused to be removed from your complainant's house and domicile all and singular the goods, wares, merchandise and chattels of every description belonging to

said Helen Nelson Early Turner and transported and returned them elsewhere; that your complainant hath not seen said Helen Nelson Early Turner since the date of her departure from his home on the 24th day of July, 1906, nor has he heard from her since the receipt of the letter referred to and marked as Exhibit C., to-wit: the 10th day of September 1906; and your complainant alleges and charges that said Helen Nelson Early Turner will never return to and live with your complainant, and hath wilfully and deliberately deserted and abandoned your complainant sine die.

In consideration whereof, your complainant being without remedy save in a court of equity, wherein such matters are alone properly cognizable and relievable, humbly prays this Honorable Court to make said Helen Nelson Early Turner party defendant to this Bill; that she be required to answer the same, answer under oath being hereby expressly waived; that he be awarded all proper processes; that he be granted leave to file such other amended and supplemental Bills during the progress of this suit as may be deemed necessary to the administration of justice and especially to the relief herein prayed; that he be granted a decree of divorce a vinculo matrimonii from said marriage with said Helen Nelson Early Turner; and that he be granted such other, further, general and special relief as to equity may seem meet and the nature of your complainant's case may seem to require.

And your complainant will ever pray, etc.

Richard Maynor Turner

J. J. Lawless
per

STATE OF VIRGINIA,

CITY OF NORFOLK, to-wit:

I, Ella M. Whitehurst, a Notary Public in and for the City and State aforesaid certify that Richard Raynor Turner, whose name is signed to the foregoing Bill in Chancery, personally appeared before me in my City aforesaid, and being first duly sworn made oath that the allegations, averments, and charges therein made are true.

My commission expires on the 10th day of January, 1912.

Given under my hand this 15th day of July, 1909.

Ella M. Whitehurst,

Notary Public.

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

RICHARD RAYNOR TURNER,
Complainant,

vs.

HELEN NELSON EARLY TURNER,
Defendant.

IN CHANCERY.

2nd August rules 1909
Process returned executed -
Bills filed - Ad nisi

1st September Rules 1909