

1924-016 Chancey Cause: Richard Hill vs Susie Hill

384 1/2

Isle of Wight County

other SURNAMES Barnes

4

COMPLAINT'S BILL

Richard Hill

vs) Chancery. No. 384 1/2

Susie Hill.

Filed 2nd May Rules. 1922.
Per R. A. Edmunds ill.

Filed 2nd May
Rules. 1922.

Dismissed &

Plaintiff.

A. S. JOHNSON
ATTORNEY AT LAW
ISLE OF WIGHT C. H., VA.

ant, ^ason, whose name is Henry Abram, and who is, at this time, about six years of age.

Complainant, therefore, prays that he may be divorced from the said Susie Hill, a mensa et thoro; and that the care and custody of the said child be awarded him; and that he may have such other, further and general relief as the court may see fit to grant.

And as in duty bound he will ever pray, etc.

John Johnson

Richard ^{his} Hill
mailed

State of Virginia,

County of Isle of Wight, to-wit:

I, A. S. Johnson, a Commissioner in Chancery for the Circuit Court of the County of Isle of Wight, in the State of Virginia, do hereby certify that Richard Hill, the above named and subscribed complainant, has this day personally appeared before me, in my said County, and made oath that the statements therein contained are true, to the best of his knowledge and belief.

Given under my hand this 29th. day of May, 1922.

A. S. Johnson
Commissioner in Chancery.

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

RICHARD HILL

VS) CHANCERY. No. _____

BILL OF COMPLAINT.

SUSIE HILL.

TO HONORABLE B. D. WHITE,

JUDGE OF THE CIRCUIT COURT OF THE COUNTY OF ISLE OF
WIGHT.

Your complainant, Richard Hill, respectfully represents
unto your honor;

1. That he has been a resident of the County of Isle of
Wight, State of Virginia, for more than one year preceeding the institu-
tion of this suit, to-wit: for fourteen years Christmas last past.

2. That on or about the 17th. day of June, 1914, he
was duly and legally married to one Susie Barnes, the license for such
marriage having issued from the Clerk's Office of the Circuit Court of
the County of Isle of Wight, Virginia, and the said marriage having been
solemnized ~~at Beacon's Castle, in the County of Surry,~~ State of Virginia,
at the house of the brother of your complainant. A copy of the marriage
license is hereto attached and is to be taken and read as a part of
this bill of complaint.

3. That after the marriage aforesaid, your complainant,
and his said wife, lived together as husband and wife, in the County of
Isle of Wight and State of Virginia, continuously, until the _____ day
of May, 1920, when the defendant, Susie Hill, wilfully, and without
just cause, deserted and abandoned your complainant, and wholly refused
to live with and cohabit with him any longer, as his wife, and from
thence, hitherto, up to the time of the institution of this suit, has
continually absented herself from him, and refused to return and live
with him, and still does so, without any guilt on the part of your com-
plainant.

4. That of said marriage there was born to your complain-

Richard L. Hill

Virginia Chancery No.

Susie Hill

ORIGINAL SUBPOENA.

VIRGINIA, Clerk's office of the Circuit
Court of the County of Isle of Wight:

192

Returned, entered and filed.

Teste:

Clerk

To 2nd April Rules.

Susie Hill not a resident of
the County of Isle of Wight.

H. H. Chapman
Sheriff.

COMMONWEALTH OF VIRGINIA:

TO THE SHERIFF OF ISLE OF WIGHT COUNTY—Greeting:

We command you that you summon Susie Hill,

to appear at the Clerk's Office of the Circuit Court of the County of
Isle of Wight at the rules to be holden for the said Court on the
Third Monday in April, 1922, to answer a bill
in chancery exhibited against her in our said Court by

..... RICHARD HILL.....

And have then and there this writ.

Witness, R. A. Edwards, Clerk of our said Court, at the Court-
house, this 3rd day of April, 1922, and in
the 146 year of the Commonwealth.

R. A. Edwards Clerk.

A. S. Johnson, p. q.

Richard Hill

~~V. Hill~~ Chancery No.

Lucie Hill

ORIGINAL SUBPOENA.

VIRGINIA, Clerk's office of the Circuit
Court of the County of Isle of Wight:

192

Returned, entered and filed.

Teste:

Clerk

< alias Simmons >

To Second May Rules.

A. S. Johnson p. q.

The within Sum^s. was executed by leaving
a true copy thereof, this 9th day of May
1922., with Lucie Hill

in person, within my County of Surry. Va

R D Edwards Shff.

Surry Co.

COMMONWEALTH OF VIRGINIA:

SURREY
TO THE SHERIFF OF ~~ISLE OF WIGHT~~ COUNTY—Greeting:

We command you that you summon "as we have heretofore commanded"

-----SUSIE HILL-----

to appear at the Clerk's Office of the Circuit Court of the County of
Isle of Wight at the rules to be holden for the said Court on the
Tjird Monday in May, 1922, to answer a bill
in chancery exhibited against her in our said Court by

-----Richard Hill-----

And have then and there this writ.

Witness, R. A. Edwards, Clerk of our said Court, at the Court-
house, this 3rd day of May, 1922, and in
the 146 year of the Commonwealth.

R. A. Edwards Clerk.

A. S. Johnson, p.q.

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Heil
vs
Hill

~~~~~  
Memo for  
Alicia Sub.

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

Richard Hill,.....Complainant

vs) Chancery. No. \_\_\_\_\_

Susie Hill,.....Defendant.

Be please to issue summons for defendant to answer  
bill filed by complainant, at the Second May Rules, 1922, and  
direct same to the Sheriff of the County of Surry.

W. Johnson p.q.

To the Clerk of the Circuit Court of the County of Isle of Wight.

*Alias Summons  
directed to Sheriff Surry.  
5/3/22*

Richard Hill being duly sworn, deposes and says:

Q. State your name, age, residence and occupation? A. Richard Hill, I am twenty nine years of age, reside in Isle of Wight County, Virginia, and am farming some, for myself, and working for a neighbor, Mr. J. R. Barlow.

Q. How long have you resided in Virginia? Ans. All my life.

Q. Have you, at any time, resided out of the State? Ans. No sir, I have not.

Q. How long have you lived in Isle of Wight County? Ans. About fourteen years, continuously.

Q. Where did you reside before coming to Isle of Wight County?

A. In Surry County.

Q. Have you ever resided in any other county in this State? A. No. You are the complainant in this suit, are you not? A? Yes sir.

Q. What is the name of your wife? A. Susie Hill, she was Susie Barnes before I married her.

Q. Where doe she now reside? A. She lives in Surry County, with her sister, Betty Bowser.

Q. Are you living with her now, as her husband? A. No.

Q. When did you separate and where were you living at that time?

A. She left me and went to Newport News in May, 1920, and we were then living in Isle of Wight County, in this State, on the land of Mr. L. Q. Jones, in the neighborhood of Rushmere.

Q. When and where and by whom were you married? A. I got my license in the Clerk's Office of this County on the 16th. of June, 1914, and was married in Isle of Wight County on the Beverly Turner place, at my brother's house (Tedlie Hill) on the 17th. day of June 1914, by William Hayward, of Bacon's Castle in Surry County.

Q. What caused your wife to leave you? A. I do not know, except that she caught a disease from some source and when she found it

out she went away. I know of no other reason for her to leave.

Q. Did she communicate that disease to you? A. Yes sir, but it did not come on me till after she had gone.

Q. Have you lived with her, at all, for any period of time since the time you state she left you, in May, 1920? A. No sir, not at all.

Q. While she lived with you how did you provide for her? A. I spent all I made at home for the support of her, her child and my child.

Q. You state that you supported her child-did she have a child when she married you? A. Yes sir, the child, a girl, was about five years old when we were married.

Q. From the time you were married to Susie Barnes have you been pretty constantly employed? A. When we were married I was working on Miss Agnes Turner's farm for Mr. Walter Thacker. I was with him five years. I then went to Mr. Lonnie Jones' and I lived with him four years and four months. While Camp Eustis was under construction, it was just across the river from where I lived, the wages over there being high, I went over there to work, and worked there about two months. Susie left me while I was at Camp Eustis, and when I left there I then came back on this side of the river and went to live with my sister, the wife of William Jones, and have been there ever since.

Q. How often did you visit your home, and how long did you stay there while you were working at Camp Eustis? I came home every Wednesday and every Saturday night. She left home just a day or so after I went to Camp Eustis to work.

Q. Did you provide for your wife as well as your earnings would allow you? A. I spent every bit of it at home.

Q. In the bill filed you state your wife has refused to return to you since she left you in May 1920. Have you ever asked her to come back? A. Yes sir, I went to Newport News after her. We have a boy, who will be seven years of age his next birth day, and while I was not in a good humor about what I caught from her on

account of the child I wanted her back, so I could take care of him and her also. She stated to me when I asked her to come back that she did not intend to come back to live with me on the farm of any white man. Had I gone over there to live she might have lived with me. She did not say so and I did not ask her. I have lived in the country all my life and do not want to live in any city. She flatly refused to come with me back and go on any white man's land.

Q. Were you ever cruel to her while she lived with her? A. No sir, I never struck her a lick in my life?

Q. Do you want your child back, and if he is given to you can you take care of him as well as she can? A. I would like to have him and could take as good care of him as she can, and better, I believe, though I do not care to deprive her of him entirely. He can live with me at my sister's house and be treated all right. I want to be able to see him and to keep him reminded that I am his father though if she keeps him.

Q. Did you make any provision for her after she left you? A. I paid four dollars a month house rent in Newport News for ten months, to Maggie Branch. I gave her a little money along to help her get the children something to eat. I have not given her anything since March before last. I have given the husband of Betty Bowser, since that time some twenty or twenty five dollars to pay him for something to eat for my child.

Q. How many children, if any, has your sister, the wife of William Jones. She has five living, ranging from about two years to eighteen years.

And further this deponent saith not.

*Attnrs.*

*R. A. Eames.*

*Richard L. Hill*  
*17th St*

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Hill

B. 9 384 1/2  
Hill

1924

Apr. 1.

Enter this

B.D.W.

Book 8

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

Richard Hill

v) Chancery. No. 384

Susie Hill.

This day came the complainant, by counsel, and moved the court to dismiss this suit from the docket.

Upon consideration whereof, it is adjudged, ordered and decreed that the same be dismissed from the docket, and that the costs thereof shall be paid by the said complainant.

Richard Hill

vs) Chancery. No. 384 1/2,

Susie Hill.

Memorandum.

Filed April 3rd. 1922:

*For, R. A. Edmunds.*  
*eld*

*4/13/22*

*Proceedings to  
determine to settle*

*Dep. 750*

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

Richard Hill

vs) Chancery, No. \_\_\_\_\_

Susie Hill.

Issue summons for defendant to answer complainant  
a bill in chancery, to be filed at secind April Rules, 1922.  
Direct process to Sheriff of Isle of Wight County.

Defendant resides near Rushmere, with her sister, Betty  
Bowser.

*A. Johnson* p.q.

TO THE CLERK OF THE CIRCUIT COURT OF ISLE OF WIGHT COUNTY.

Check for \$7.50 herewith to cover deposit.

Check for .50 herewith to cover Sheriff fee for serving process.