

1927-028 Chancery Causes: W. H. Edwards vs Naomi Virginia Edwards
Dsh of Wight County Petition of Naomi Virginia Edwards

479

other surnames: Holcomb, Beale,
Joyner, Harcum, Weston, Beal

E. H. WILLIAMS

Attorney-at-Law

SMITHFIELD - VIRGINIA

Oct. 15, 1926.

Mr. R. A. Edwards,
Isle of Wight, Va.

Dear Gus:

Edwards vs. Edwards.

In the above case I will thank you to summons for
the Plaintiff Deputy Sheriff Harcumb, of Isle of Wight,
and the Rev. H. L. Western, of Courtland, Southampton
County, Virginia.

I am,

Very truly yours,

EHW:G

E. H. Williams

*ok
used to mail 10/18/26*

NCE

E. H. WILLIAMS

Attorney-at-Law

SMITHFIELD - VIRGINIA

March 25, 1926.

Mr. R. A. Edwards,

Isle of Wight, Va.

Dear Gus:

Re: Edwards vs. Edwards.

I beg to herewith enclose memorandum in the above case, also check for \$8.50, to cover deposit.

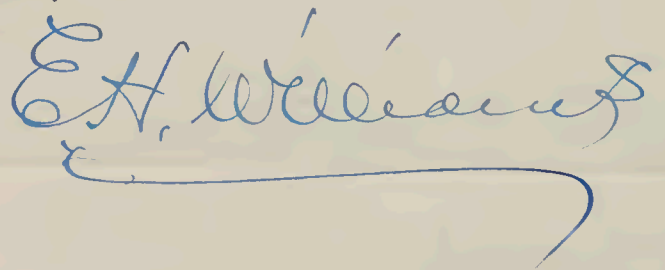
The defendant lives in Franklin, in Southampton County.

Please forward summons to me and I will send same to the Sheriff of Southampton.

I am,

Very truly yours,

EHW:G

A handwritten signature in blue ink, reading "E. H. Williams". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

VIRGINIA:

IN THE CIRCUIT COURT OF ISLE OF WIGHT COUNTY.

-----oOo-----

W. H. Edwards,.....Plaintiff.

VS. IN CHANCERY.

Naomi Virginia Edwards,.....Defendant.

-----oOo-----

TO THE CLERK OF SAID COURT:

Issue summons in chancery to first April rules,
1926, for said plaintiff against the said defendant
to answer the said plaintiff a bill in chancery.

E. H. Williams p.q.

No. 1 ~~Earned~~
vs. V. Earned
Naomi

#479

memo filed &
process raised
3/27/26.

Dep. 850

Pd 800

Son. Co

50

800

VIRGINIA:

IN THE CIRCUIT COURT OF ISLE OF WIGHT COUNTY.

W. H. Edwards,.....Plaintiff.

VS: IN CHANCERY.

Naomi Virginia Edwards,.....Defendant.

This cause came on this day to be heard upon the Complainant's bill, exhibits filed therewith, and upon the testimony of witnesses taken in open Court; the defendant still failing to plead, answer or demur, and was argued by Counsel *for both the Complainant and Defendant;*

And
~~On consideration whereof~~ the Court being of opinion from the evidence submitted ~~on behalf of the plaintiff,~~ that the marriage heretofore entered into between the parties ~~to~~ this cause on February 16th, 1926, was entered into under duress by the said plaintiff; the Court doth, adjudge, order and decree that the said marriage is hereby annulled and is hereby decreed to be null and void ~~from its beginning;~~ and the Court doth further adjudge, order and decree that the said plaintiff pay to E. L. Beale, Attorney for the said defendant, the sum of Two Hundred and Fifty (\$250.00) Dollars, ~~in weekly installments of~~ \$_____, (\$_____), in full for Attorney fee; suit money and ~~temporary~~ *permanent* alimony hereby decreed to the said plaintiff in accordance with an agreement entered into between Counsel representing both parties to this suit. The Court hereby states that no evidence was offered to substantiate the charges contained in the plaintiff's bill in reference to the causes of divorce therein stated. And this cause is continued.

W.H. Edwards, Plaintiff.

Vs: In Chancery.

Naomi Virginia Edwards,
Defendant.

DECREE.

1927
Ch. N.
Entered
1861

Book 8 Page 38

E. H. WILLIAMS,
ATTORNEY-AT-LAW,
SMITHFIELD, VIRGINIA

W. H. Edwards

vs.

Naomi Virginia Edwards

This cause came on this day to be heard on the bill and exhibits and upon the amended bill this day filed by leave of Court, and upon petition of Counsel asking leave to file an answer on behalf of the respondent. Upon consideration whereof the said request is granted and leave is granted for the filing of the said answer which is accordingly filed.

W H Edwards

vs.

Naomi Virginia Edwards

Steele

1926 Oct 22nd Enter

1926

Oct 22

Enter

1926

Book 8
Page 349

Courtland, Virginia,

June 14 1924

Mr.

E. L. Beale atty

Franklin,

To H. B. McLEMORE, Dr.

Clerk of the Circuit Court of Southampton County

To copy of Marriage
License William H. Edwards
vs. Jayner Naomi Va.

75

I, H. L. Weston, a Minister of the
M. E. Church, South, do certify that on
15th, of Feb. 1926, I was sick in
bed and ~~about~~ some time after eight
o'clock at night several parties came
to my house to get me to perform a
marriage ceremony. And that
I did marry William H. Edwards
and Naomi Virginia Joyner and
did give the marriage certificate
as is customary. And did fill in
and return to the Clerks Office of
Southampton County the ~~house~~
marriage license.

I recognized Mr. Bealy as thought
it was a forced marriage, as it was
a little unusual at that time of night
and for a lawyer to be present.

The groom paid the fee as usual.
There was no excitement, as they
departed.

H. L. Weston

The Commonwealth of Virginia,

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

WE COMMAND YOU to summon.....Rev. H. L. Western,.....

to appear before the Judge of our Circuit Court of the County of Isle of Wight, at the court-house thereof, on the 22nd.....day of October 1926 @ 10;30 A.M., to testify and the truth to say in behalf of the Plaintiff

.....in a certain controversy in our said court, before the said Judge depending and undetermined, between.....

W. H. Edwards....., Plaintiff ,

and.....

Naomi V. Edwards,....., Defendant ,

And have then there this writ. Witness R. A. Edwards
~~W. S. JOHNSON~~, Clerk of our said court, at the court-house, the 22th day of October 1926....., and in the 151 year of the Commonwealth.

NOTE.—Appear before the Clerk and claim your attendance.

R. A. Edwards
Clerk

CONTROVERSY.

W. H. Edwards.

SUBPOENA
FOR
WITNESS

Vs.

Naomi V. Edwards.

Circuit Court
of

Isle of Wight County

the 22 day of October 1926

E. H. Williams, p.q.

Executed in Southampton County, Va., this 21st day of October, 1926, by delivering a true copy hereof to the within named Rev. H. I. Western in person.

T. B. Bell, Sheriff,

By T. B. Bell, D. S.

The Commonwealth of Virginia,

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

WE COMMAND YOU to summon Rev. H. L. Western,

to appear before the Judge of our Circuit Court of the County of Isle of Wight, at the court-house thereof, on the 22nd day of October 1926 10:30 A.M., to testify and the truth to say in behalf of the Plaintiff

in a certain controversy in our said court, before the said Judge depending and undetermined, between

W. H. Edwards, Plaintiff, and

Naomi V. Edwards, Defendant,

And have then there this writ. Witness R. A. Edwards ~~W. S. JOHNSON~~, Clerk of our said court, at the court-house, the 28th day of October 1926, and in the 151 year of the Commonwealth.

NOTE.—Appear before the Clerk and claim your attendance.

R. A. Edwards
Clerk

CONTROVERSY.

35 mls -

Court land

SUBPOENA
FOR
WITNESS

Dillwyn,

Buckingham Co.
yn

Circuit Court
of
Isle of Wight County

the day of

The Commonwealth of Virginia,

To the Sheriff of the County of Isle of Wight, Greeting:

WE COMMAND YOU to summon J. L. Harcum,

to appear before the Judge of our Circuit Court of the County of Isle of Wight, at the court-house thereof, on the 22nd day of October 1926, to testify and the truth to say in behalf of the Plaintiff,

in a certain controversy in our said court, before the said Judge depending and undetermined, between

W. H. Edwards, Plaintiff,

and

Naomi V. Edwards, Defendant,

And have then there this writ. Witness R. A. Edwards Clerk of our said court, at the court-house, the 18th day of October 1926, and in the 151 year of the Commonwealth.

NOTE.—Appear before the Clerk and claim your attendance.

CONTROVERSY.

.....
..... } **SUBPOENA
FOR
WITNESS**

.....
.....
**Circuit Court
of
Isle of Wight County**

the.....day of.....
.....
.....

The Commonwealth of Virginia,

To the Sheriff of the County of Isle of Wight, Greeting:

WE COMMAND YOU to summon J. L. Harcum,

to appear before the Judge of our Circuit Court of the County of Isle of Wight, at the court-house thereof, on the 22nd day of October 1926, to testify and the truth to say in behalf of the Plaintiff,

in a certain controversy in our said court, before the said Judge depending and undetermined, between

W. H. Edwards, Plaintiff ,
and

Neomi V. Edwards, Defendant ,

And have then there this writ. Witness R. G. Edwards Clerk of our said court, at the court-house, the 18th day of October 1926, and in the 151 year of the Commonwealth.

NOTE.—Appear before the Clerk and claim your attendance.

R. G. Edwards
Clerk

CONTROVERSY.

W. H. Edwards,

Vs

SUBPOENA
FOR
WITNESS

Naomi V. Edwards.

Circuit Court

of

Isle of Wight County

the day of

Executed in the County of
Isle of Wight on this 21 day of
Oct 1926 by delivering a true copy
of the within to the within named
in person

W. H. Chapman, Sheriff
By J. L. Harcum D.S.

The Commonwealth of Virginia,

To the Sheriff of the County of Isle of Wight, Greeting:

WE COMMAND YOU to summon.....

A. H. Roberts

to appear before the Judge of our Circuit Court of the County of Isle of Wight, at the court-house thereof, on the *14* day of *April* *1927*, to testify and the truth to say in behalf of the *defendant*.

.....in a certain controversy in our said court, before the said Judge depending and undetermined, between.....

Edwards

....., Plaintiff ,

and.....

Edwards

R A Edwards....., Defendant ,

And have then there this writ. Witness ~~A. S. JOHNSON~~, Clerk of our said court, at the court-house, the *13* day of *April* *1927*, and in the *151* year of the Commonwealth.

R A Edwards. clk

NOTE.—Appear before the Clerk and claim your attendance.

By E. Kay will D.C.

CONTROVERSY.

Edwards

SUBPOENA
FOR
WITNESS

Edwards

Circuit Court

of

Isle of Wight County

the 13 day of April

Executed in Isle of Wight County as
herein directed by the 13th day of April 1927
The same on A. K. Roberts in person.
W. H. Chapman Sheriff.

The Commonwealth of Virginia,

To the Sheriff of the County of Isle of Wight, Greeting:

WE COMMAND YOU to summon

E. L. Beale

to appear before the Judge of our Circuit Court of the County of Isle of Wight, at the court-house thereof, on the *14th* day of *April* *1927*, to testify and the truth to say in behalf of the *Plaintiff*

in a certain controversy in our said court, before the said Judge depending and undetermined, between

E. Edwards, Plaintiff ,
and

E. Edwards, Defendant ,

And have then there this writ. Witness *R. S. Edwards* A. S. JOHNSON, Clerk of our said court, at the court-house, the *9* day of *April* *1927*, and in the *15th* year of the Commonwealth.

R. S. Edwards *clerk*

NOTE.—Appear before the Clerk and claim your attendance.

127 E. K. Wells D.C.

CONTROVERSY.

Edwards

SUBPOENA
FOR
WITNESS

Edwards

Circuit Court
of
Isle of Wight County

the 14 day of April 1927

The Commonwealth of Virginia,

To the Sheriff of the County of Isle of Wight, Greeting:

WE COMMAND YOU to summon J. L. Harcum & E. L. Beale

to appear before the Judge of our Circuit Court of the County of Isle of Wight, at the court-house thereof, on the 14th day of April, 1927, to testify and the truth to say in behalf of the Plaintiff

in a certain controversy in our said court, before the said Judge depending and undetermined, between

Edwards, Plaintiff, and

Edwards, Defendant,

And have then there this writ. Witness R. A. Edwards A. S. JOHNSON, Clerk of our said court, at the court-house, the 9 day of April, 1927, and in the 15th year of the Commonwealth.

R. A. Edwards clerk

NOTE.—Appear before the Clerk and claim your attendance.

By E. Kay wills

CONTROVERSY.

original

Edwards

SUBPOENA
FOR
WITNESS

Edwards

Circuit Court
of
Isle of Wight County

the *14* day of *April* 19*27*

Roberts

Executed this *11th* day of *April* 19*27* by serving a
copy of the within on *E. L. Beale and J. L. Varner*
W. H. Chapman, Sheriff
by *J. L. Hanner, D.S.*

Commonwealth of Virginia,

To the Sheriff of Isle of Wight County—Greeting:

WE COMMAND YOU, That you summon Naomi Virginia Edwards,

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 First Monday in April, 1926,
to answer a bill in chancery, exhibited against her
in our said Court by W. H. Edwards.

And have then and there this writ.

Witness, R. A. EDWARDS, Clerk of our said Court, at the Courthouse, this 27th
day of March, 1926, and in the 150th year of the
Commonwealth.

R. A. Edwards Clerk.

Executed in Southampton County Virginia, this 30th. day of March 1926,
by delivering a true copy hereof to the within named, Naomi Virginia
Edwards, in person.

J. B. Bell

Sheriff of Southampton County Virginia.

Naomi Virginia Edwards

vs. }

CHANCERY NO.-----

Naomi Virginia Edwards,

ORIGINAL SUBPOENA

Virginia, Clerk's office of the Circuit
Court of the County of Isle of Wight.

-----, 19-----
Returned, entered and filed.

Teste:

Clerk

To ----- First April ----- Rules

19 26

J. H. Williams, ----- p. q.

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

W. H. Edwards

vs.

Naomi Virginia Edwards

The separate answer of Naomi Virginia Edwards to a bill in chancery filed against her in the Circuit Court of Isle of Wight County, Virginia by W. H. Edwards.

So far as your respondent is advised that it is necessary for her to answer, answers and says:

(1) That she is of tender years, an infant under the age of twenty one years, that is to say she is 18 years of age, and she prays that ~~her~~ interests may be protected by this Court; and,

(2) She admits that she and the said W. H. Edwards were married in Courtland, Virginia, in Southampton County, on the 16th day of February 1926; and,

(3) She admits that her father, J. H. Joyner, E. L. Beale and J. L. Harcum were present at the said marriage and that the ceremony was performed at about nine o'clock at night by the Rev. A. R. Weston.

She denies that any threats were made until after the ceremony was performed, and then when the said W. H. Edwards, her said husband, was about to desert her at the home of her father, the said J. H. Joyner, her said father did ask the said W. H. Edwards why he had treated his daughter as he had and said that "if I were to do the right thing I would kill you, and I ought to do it now".

You respondent denies that she left her said husband and went to Richmond, but on the other hand he sent her there for purposes best known to himself, and also emphatically denies the charge of adultery.

All other allegations not specifically admitted are denied, and strict proof thereof is called for.

And now having fully answered your complainant's bill, your respondent prays for the protection of this Court and that she be allowed reasonable attorney's fees for defending this suit and that she be

be allowed her reasonable costs in her behalf thus expended.

And your respondent will ever pray, etc.

Naomi Virginia Edwards.

E. L. Beale
Counsel.

Subscribed and sworn to before me, R. A. Edwards - a Comm. in
Chancery, for the District Court of the County of Loudoun, Virginia
by Naomi Virginia Edwards this 22 day of October, 1926.

R. A. Edwards
Comm. in Chancery,

W.H. Edwards

vs

Naomi Virginia Edwards

Answer

Filed Oct 22-1926.

In the Circuit Court of Isle of Wight County, Virginia.

W. H. Edwards

vs.

Naomi Virginia Edwards.

To the Honorable B. D. White, Judge of the said Court:

Your respondent, Naomi Virginia Edwards prays that leave be granted her to file her answer to a certain bill in chancery now pending against her in the Circuit Court of said County filed by the said W. H. Edwards. No answer has been filed prior to this time on account of the promise of an amended bill would be filed which has only this day been done.

Given under my hand this 22nd day of October, 1926.

E. L. Beale

p.d.

Naomi Virginia Edwards

W. H. Edwards

vs

Nāoni Virginia Edwards

Petition

Filed Oct 22 - 1926

VIRGINIA:

IN THE CIRCUIT COURT OF ISLE OF WIGHT COUNTY.

W. H. Edwards,.....Plaintiff.

Vs. In Chancery.

Naomi Virginia Edwards,.....Defendant.

- - - - -

Your Complainant, W. H. Edwards, showeth unto the Court the following case:

That your Complainant and the said defendant are domiciled in, and are and have been actual bona fide residents of this State for at least one year, preceding the commencement of this suit; that both of the said parties are now domiciled in and are now at the time of bringing of this suit actual bona fide residents of this State; that said plaintiff now resides in the said County of Isle of Wight, and last technically co-habited with the said defendant in the said County;

That on the 16th, day of February, 1926, your Complainant was forced and compelled to marry said defendant in the town of Courtland, in the County of Southampton, Virginia, as will appear by a certified copy of the marriage license herewith filed, marked "Exhibit A" and made a part of this bill;

That the said marriage was entered into under the following circumstances to-wit: On the night of February 16th, 1926, two men came to the store, (known as the D. P. Store) in the town of Windsor, Virginia, your Complainant being the manager of the said store, and stated to your Complainant that they had a warrant for your Complainant's arrest, and upon your Complainant's inquiry as to what he was being arrested for, the warrant was then read, in which

said warrant your Complainant was falsely charged with having seduced the said defendant under a promise of marriage; they then explained and stated to your Complainant that Joyner, the father of the said defendant, had started over to Windsor on Monday, February 15th, to kill your Complainant, and that they had had great difficulty in keeping him from coming to Windsor to kill your said Complainant; then one of the said men, whom your Complainant afterwards found out to be Mr. Holcumb, a Deputy Sheriff, of the County of Isle of Wight, asked your Complainant if he had a gun, and if so, not to carry it with him as Joyner, father of the said defendant, had brought them over from Franklin to Windsor, and had his gun with him and trouble was expected; your Complainant was then forced against his will to go with the said Holcumb, Deputy Sheriff as aforesaid, Joyner, father of the said defendant, and E. L. Beale, a Lawyer, representing the said defendant, and being one of the men who entered the store, as aforesaid, to Franklin, a town some sixteen or seventeen miles distance from the town of Windsor, Virginia; that under such circumstances, your Complainant being in great fear of his life, or great bodily harm, was carried from Franklin on to Courtland, where in great haste and against your Complainant's wishes, he was forced and compelled to enter into the aforesaid marriage; that the said Joyner, father of the said defendant, stated to the said plaintiff immediately after the said marriage that he, the said Joyner, had started over to Windsor that evening to kill your said Complainant, and that he, the said Joyner, had a good mind to kill your said Complainant then and there;

That the defendant knowingly and fraudulently had your Complainant arrested on a false charge; that the said defendant well knew that the said plaintiff had never at any time or place courted or made love to the said defendant, nor made her a

promise of marriage or suggested marriage or said or did anything which would lead the defendant to believe that the said plaintiff intended to marry her; that on the contrary your said plaintiff endeavored to discourage the attentions and advancements of the said defendant towards your said plaintiff;

Your Complainant alleges and charges that the said defendant obtained the said criminal warrant falsely charging your Complainant with a crime for the sole purpose of forcing your Complainant to marry her, or to give her a large sum of money; that the said defendant obtained the services of the said Deputy Sheriff, and the said Lawyer to assist her and her father in bringing about the said marriage, that the threats to put in jail and the threats to kill your Complainant, made by the said Joyner, father of the said defendant, and the display of arms made by the said Joyner and Holcumb, and the general demean and actions of the said Joyner and Holcumb, which continued until the said marriage was consummated was such as to overcome the mind and will of your Complainant, and that your Complainant submitted to said marriage solely because of the fear of great bodily harm or death or imprisonment at the hands of the above named parties who had by their actions and threats and demeanors completely overcome the mind and will of your said Complainant;

That immediately after the consummation of the said marriage was completed your Complainant was forced to take the said defendant back with him to the town of Windsor; where the said plaintiff and the said defendant lived together for a period of three days, at which time the said defendant left your said plaintiff and went to the City of Richmond, Virginia,

That your Complainant was located in Franklin, the home of the defendant, for a period of seven weeks, prior to Thanksgiving Day, in November 1925, and during the said seven weeks period your Complainant first met and was in

the company of the said defendant on a few occasions; that on Thanksgiving Day, 1925, the defendant without the consent and against the wishes of the said Complainant, came to see him at Suffolk, Virginia, where he was then located as Manager of a D. P. Store, at which time your Complainant told the said defendant not to attempt to see him again; that your Complainant did not again see the defendant until the said day of February 16th, 1926; at which time it was claimed that the said defendant was with child by your Complainant; your Complainant believes and charges that the plaintiff well knew that she was not with child by your Complainant, (and your Complainant now doubts that she was with child by any one), but made such a charge for the purpose of aiding in the scheme of terrorizing your Complainant into a marriage with her against your Complainant's will; Your Complainant charges that if at the time of the said marriage the said defendant was in fact with child then it was by some person other than your Complainant and without his knowledge; and, that if the said defendant has become with child since the consumation of the aforesaid purported marriage then the said defendant has been guilty of adultery with some person unknown to your Complainant and at an unknown time and place;

That the said defendant prior to the aforesaid marriage had been a prostitute without the knowledge of your Complainant.

In tender consideration whereof, and for as much as your Complainant is remediless, save in a Court of Equity, where matters of this kind are properly cognizable, your Complainant prays that the said Naomi Virginia Edwards, be made a party defendant to this bill, and required to answer same, answer under oath, being hereby waived, as by the statute in such cases made and provided; that proper process issue; that the marriage which was entered into by your Complainant, W. H. Edwards, on the 16th,

day of February, 1926, be annulled and declared void; that if it is decreed that the said marriage is not invalid, that a divorce, a vinculo, may be granted to your said Complainant; and that all such other orders and decrees may be entered and such further and general relief may be granted as the nature of your Complainant's case may require or to equity and good conscious shall seem meet.

And your Complainant will ever pray, etc.

E. N. Williams -

W. H. Edwards

By Counsel

W. H. Edwards, Plaintiff.

VS. In Chancery.

Naomi Virginia Edwards,
Defendant.

- Amended -
BILL.

Filed Oct-22-1906.

E. H. WILLIAMS,
ATTORNEY-AT-LAW,
SMITHFIELD, VIRGINIA

VIRGINIA:

IN THE CIRCUIT COURT OF ISLE OF WIGHT COUNTY.

W. H. Edwards,.....Plaintiff.

VS. In Chancery.

Naomi Virginia Edwards,.....Defendant.

Your Complainant, W. H. Edwards, sheweth unto the Court the following case:

That your Complainant and the said defendant are domiciled in, and are and have been actual bona fide residents of this State for at least one year, preceding the commencement of this suit; that both of the said parties are now domiciled in and are now at the time of bringing of this suit actual bona fide residents of this State; that said plaintiff now resides in the said County of Isle of Wight, and last technically co-habited with the said defendant in the said County;

That on the 16th, day of February, 1926, your Complainant was forced and compelled to marry said defendant in the town of Courtland, in the County of Southampton, Virginia, as will appear by a certified copy of the marriage license herewith filed, marked "Exhibit A" and made a part of this bill;

That the said marriage was entered into under the following circumstances to-wit: On the night of February 16th, 1926, two men came to the store, (known as the D. P. Store) in the town of Windsor, Virginia, your Complainant being the manager of the said store, and stated to your Complainant that they had a warrant for your Complainant's arrest, and upon your Complainant's inquiry as to what he was being arrested for, the warrant was then read, in which said warrant your Complainant was falsely charged with hav-

ing seduced the said defendant under a promise of marriage; they then explained and stated to your Complainant that Joyner, the father of the said defendant, had started over to Windsor on Monday, February 15th, to kill your Complainant, and that they had had great difficulty in keeping him from coming to Windsor to kill your said Complainant; then one of the said men, whom your Complainant afterwards found out to be Mr. Holcomb, a Deputy Sheriff, of the County of Isle of Wight, asked your Complainant if he had a gun, and if so, not to carry it with him as Joyner, father of the said defendant, had brought them over from Franklin to Windsor, and had his gun with him and trouble was expected; your Complainant was then forced against his will to go with the said Holcomb, Deputy Sheriff as aforesaid, Joyner, father of the said defendant, and E. L. Beale, a Lawyer, representing the said defendant, and being one of the men who entered the store, as aforesaid, to Franklin, a town some sixteen or seventeen miles distance from the town of Windsor, Virginia; that on the way to Franklin, the said E. L. Beale, continued to remark of the great hurry he was in and when your Complainant being in great fear, meekly suggested that he be allowed to see a Lawyer, the said E. L. Beale discouraged and discountenanced such an idea, saying he did not have time to wait for that; that under such circumstances, your Complainant being in great fear of his life, or great bodily harm, was carried from Franklin on to Courtland, where in great haste and against your Complainant's wishes, he was forced and compelled to enter into the aforesaid marriage; that the said Joyner, father of the said defendant, stated to the said plaintiff immediately after the said marriage that he, the said Joyner, had started over to Windsor that evening to kill your said Complainant, and that he, the said Joyner, had a good mind to kill your said Complainant then and there;

That the defendant knowingly and fraudulently had your Complainant arrested on a void, false and fraudulent warrant; that the said defendant well knew that the said plaintiff had never at any time or place courted or made love to the said defendant, nor made her a promise of marriage or suggested marriage or said or did anything which would lead the defendant to believe that the said plaintiff intended to marry her; that on the contrary your said plaintiff endeavored to discourage the attentions and advancements of the said defendant towards your said plaintiff;

Your Complainant alleges and charges that the said defendant obtained the said criminal warrant falsely charging your Complainant with a crime for the sole purpose of forcing your Complainant to marry her, or to give her a large sum of money; that the said defendant obtained the services of the said Deputy Sheriff, and the said Lawyer to assist her and her father in bringing about the said marriage, that the threats to put in jail and the threats to kill your Complainant, made by the said Joyner, father of the said defendant, and the display of arms made by the said Joyner and Holcomb, and the general demean and actions of the said Joyner, Holcomb and Beale, which continued until the said marriage was consummated was such as to overcome the mind and will of your Complainant, and that your Complainant submitted to said marriage solely because of the fear of great bodily harm or death or imprisonment at the hands of the above named parties who had by their actions and threats and demeanor completely overcome the mind and will of your said Complainant;

That immediately after the consummation of the said marriage your Complainant was was completed and/forced to take the said defendant back with him

to the town of Windsor; where the said plaintiff and the said defendant lived together for a period of three days, at which time the said defendant left your said plaintiff and went to the City of Richmond, Virginia.

That your Complainant was located in Franklin, the home of the defendant, for a period of seven weeks, prior to Thanksgiving Day, in November 1925, and during the said seven weeks period your Complainant first met and was in the company of the said defendant on a few occasions; that on Thanksgiving Day, 1925, the defendant without the consent and against the wishes of the said Complainant, came to see him at Suffolk, Virginia, where he was then located as Manager of a D. P. Store, at which time your Complainant told the said defendant not to attempt to see him again; that your complainant did not again see the defendant until the said day of February 16th., 1926,;at which time it was claimed that the said defendant was with child by your complainant; your complainant believes and charges that the plaintiff well knew that she was not with child by your complainant, (and your complainant now doubts that she was with child by any one), but made such a charge for the purpose of aiding in the scheme of terrorizing your complainant into a marriage with her against your complainant,s will; Your Complainant charges that if at the time of the said marriage the said defendant was in fact with child then it was by some person other than your complainant and without his knowledge; and, that if the said defendant has become with child since the consumation of the aforesaid purported marriage then the said defendant has been guilty of adultery with some person unknown to your complainant and at an unknown time and place;

That the said defendant prior to the aforesaid marriage had been a prostitute without the knowledge of your complainant.

In tender consideration whereof, and for as much as your Complainant is remediless, save in a Court of Equity, where matters of this kind are properly cognizable, your Complainant prays that the said Naomi Virginia Edwards, be made a party defendant to this bill, and required to answer same, answer under oath, being hereby waived, as by the statute in such cases made and provided; that proper process issue; that the marriage which was entered into by your Complainant, W. H. Edwards, on the 16th, day of February, 1926, be annulled and declared void; that if it is decreed that the said marriage is not invalid, that a divorce, a vinculo, may be granted to your said Complainant; and that all such other orders and decrees may be entered and such further and general relief may be granted as the nature of your Complainant's case may require or to equity and good conscious shall seem meet.

And your Complainant will ever pray, etc.

W. H. Edwards JS
By Benjamin
E. H. Wilson & Co.

W. H. Edwards, Plaintiff.

Vs: In Chancery.

Naomi Virginia Edwards,
Defendant.

BILL.

E. H. WILLIAMS,
ATTORNEY-AT-LAW.
SMITHFIELD, VIRGINIA