1929-007 Chancery Causes. Annie Warren Williams, by & c vs Jessie Williams
Isle of Wight County Jessie Williams vs Annie Warren Williams, by & c

568

other surnames: WARREN

HOLLAND & LOVELACE
ATTORNEYS AT LAW
SUFFOLK, VIRGINIA

HUGH L. HOLLAND
J. MELVIN LOVELACE

October 10, 1929

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

In re: Annie Warren Williams, who sues by J.W. Warren, her next friend.
vs: Jessie Williams

Dear Gus:-

This letter will be handed to you by Mr. Jessie Williams. Please turn over to him summons for the following witnesses, for the defense in the above styled suit for Monday October 14, 1929 or Tuesday, October 15, 1929 (I will tell you the date over the telephone when he gets there, if you will be kind enough to call at my expense), as follows:

(1) S.E. Roberts
(2) Mrs. S.E. Roberts
(3) Sam Nelms
(4) Mrs. Sam Nelms
(5) Miss Nellie Mae Nelms
(6) Harry Redd
(7) Mrs. Harry Redd
(8) John M. Underwood
(9) Mrs. Odie Butler
(10) H.P. Roberts
(11) Mrs. H.P. Roberts
(12) W.S. Wilkinson

Please address the above subpoenas to the Sheriff of Isle of Wight County.

(13) John B. Archer
(14) Luther Davis
(15) Herbert Matthews

Please address subpoenas for the last three mentioned witnesses to the Sheriff of Nansemond County.

Yours very truly,
HOLLAND & LOVELACE
BY Hugh L. Holland

HLH/MJ

MARRIAGE LICENSE

Virginia Isle of Wight 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, Jesse Merritt Williams *and* Annie Virginia Warren

Given under my hand, as Clerk of Circuit *Court of* Isle of Wight *County* (or ~~City~~) *this* 20th *day of* July, , 19 29.

R. A. Edwards, *Clerk.*

MARRIAGE CERTIFICATE

To be annexed to the License, required by Section 5074 of the Code of Virginia, 1919, as amended by Act of February 16, 1910.

VIRGINIA: In the Clerk's Office of the Circuit *Court for the County* (or ~~City~~) *of* Isle of Wight

Date of Marriage July 21st, 1929. Place of Marriage Suffolk-Virginia

FULL NAMES OF PARTIES

Jesse Merritt Williams *and* Annie Virginia Warren

Age of Husband 27 years; Condition (single, widowed or divorced) Single

Age of Wife 16 years; Condition (single, widowed or divorced) Single

Race (White or Colored) White

(PRESENT)

Husband's Place of Birth Brunswick Co., Va. Mailing Address Windsor-Va. R-1

Wife's Place of Birth Norfolk County, Va. Mailing Address Windsor-Va. R-1

Names of Parents { Husband J. B. Williams and Martha Weaver Williams
Wife Joseph Wesley Warren and Jessie Lee Stephenson Warren

Occupation of Husband Farmer

Given under my hand this 20th day of July, , 1929.

R. A. Edwards, *Clerk.*

Certificate of Time and Place of Marriage

I, I. W. Johnson, a Minister of the Christian Church, or religious order of that name, do certify that on the 21st day of July, , 19 29, at Suffolk, Virginia, under authority of the above License, I joined together in the Holy State of Matrimony the persons named and described therein. I qualified and gave bond according to law authorizing me to celebrate the rites of marriage in the County (or ~~City~~) of Nansemond, State of Virginia.

Given under my hand this 21st day of July, , 19 29.

I. W. Johnson

(Person who performs ceremony sign here.)

☞ The Minister or other person celebrating a marriage is required, within thirty (30) days thereafter, to return the License and Certificate of the Clerk and his certificate of the time and place at which the marriage was celebrated to the Clerk who issued the License; failure to comply with these requirements of the law makes the Minister or other person celebrating the marriage liable to a fine of not less than ten nor more than twenty dollars for each offense (see Section 5074 of the Code of Virginia, as amended by Act approved February 16, 1910, Acts 1910, chapter 28, pages 36 and 37).

County (or ~~City~~) ~~Isle of Wight~~

Jesse Merritt Williams
Husband

and { **Marriage License**

Annie Virginia Warren
Wife

Date of Issue July 20th, 1929.

Marriage Register No. 4 *Page* 188

A Copy:

Teste: R. A. Edwards
Clk.

Per: E. M. Whitley D.C.

HOLLAND & LOVELACE
ATTORNEYS AT LAW
SUFFOLK, VIRGINIA

HUGH L. HOLLAND
J. MELVIN LOVELACE

October 10, 1929

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

In re: Annie Warren Williams, who sues by J.W. Warren, her next friend.
v: Jessie Williams

Dear Gus:-

I hand you herewith Cross Bill and Answer of Jessie Williams in this suit and also order entered by Judge White today allowing same to be filed. Please file same for me.

Yours very truly,

HOLLAND & LOVELACE

BY Hugh L. Holland.

HLH/MJ
Encs.

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

Annie Warren Williams, who sues by J. W.
Warren, her next friend,

v). Chancery. No. ____.

Jessie Williams.

To R. A. Edwards, Clerk of the Circuit Court of the County of Isle of Wight, State of Virginia:

Please issue process for the defendant to answer a bill of complaint to be filed against him by the complainant at the rules to be holden on the first Monday in October, 1929.

The defendant resides in Isle of Wight County.

Johnson & Stephens.

Johnson and Stephens, f.c.

Virginia: Circuit Court of the County of Isle of Wight.

Annie Warren Williams, who sues by J. T. Warren, her next friend,

v). Chancery. No. 568

Jessie Williams.

Memorandum.

Filed 10/4/29.

LAW OFFICES
JOHNSON AND STEPHENS
SMITHFIELD, VIRGINIA

The Linden Printing Company, Hartford, Connecticut

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

Annie Warren Williams, who sues by J.W. Warren,
her next friend.....Complainant

V. DECREE

Jessie Williams.....Defendant

This day came Annie Warren Williams, who sues by J.W. Warren, her next friend, Complainant, by counsel and Jessie William, Defendant, by counsel, and it appearing to the Court that since the institution of this suit, that the said Annie Warren William has returned to her husband, the said Jessie Williams, and that they are now living together as husband and wife, and on motion of the Complainant, this suit is dismissed.

It appearing that there is nothing further to be done in this suit, the same is hereby ordered to be stricken from the docket.

Annie Warren Williams, who sues
by J.W. Warren, her next friend,
Complainant

V. 562 DECREE

Jessie Williams....Defendant

We have sen this.
Johnson Stephens.

1929
Dec. 18.
Entered this
12 M.

8-537

HOLLAND & LOVELACE
ATTORNEYS AT LAW
SUFFOLK, VIRGINIA

IN THE CIRCUIT COURT OF ISLE OF WIGHT, VIRGINIA:

Annie Warren Williams, who sues by J.W. Warren, her next friend.....Complainant

V. DECREE

Jessie Williams.....Defendant

This day came Annie Warren Williams, who sues by J.W. Warren, her next friend, Complainant, by counsel and Jessie Williams, Defendant, by counsel, and by consent of both Complainant and Defendant the order entered in this suit by this Court on October 4, 1929 is hereby dissolved and vacated.

And this case is continued.

Annie Warren Williams, who sues
by J.W. Warren, her next friend,
Complainant

#569

V. DECREE

Jessie Williams....Defendant

1939 15
Oct. 15
Entered this
P.H.W.

8-531

HOLLAND & LOVELACE
ATTORNEYS AT LAW
SUFFOLK, VIRGINIA

In the Circuit Court of Isle of Wight County.

Annie Warren Williams who sues by J. W. Warren her next friend	)	Plaintiff.
vs.	)	Mr Chancery
Jessie Williams	)	Defendant.

This day came the defendant, and asks leave to file his answer and cross bill in this cause, and leave being granted, said answer and cross bill are accordingly filed.

Annie Warren Williams
by 1c 568
vs 3 Dr Cly
Jessie Williams

1929
Oct. 10.
Entered this
[illegible]

8-529

VIRGINIA: IN THE CIRCUIT COURT OF THE COUNTY OF ISLE OF WIGHT, ~~THE FIFTH DAY OF OCTOBER, 1929~~.

Annie Warren Williams, who sues by J. W.
Warren, her next friend,

v) Chancery, No_____

Jessie Williams.

This day came Annie Warren Williams, who sues by J. W. Warren, her father and next friend, by counsel, and presented her bill of complaint, ~~in the cause~~ duly verfied by affidavit, praying for a divorce a mensa and for the injunction, and moved the Court to require the respondent, Jessie Williams, to pay to her, the said Annie Warren Williams, a reasonable sum of money for the maintenance and support of herself, during the pendency of this cause, and a sufficient sum of money to enable her to carry on and prosecute the same, and for other relief; and the Court having considered the bill ~~of complaint, and the affidavit, thereto~~: but ~~it is~~ adjudged, ordered and decreed that the said Jessie Williams pay unto the said Annie Warren Williams, or to Johnson & Stephens, her counsel, on the 5th. day of each month, after the date hereof, the sum of $20.00 for ~~the~~ support and maintenance ~~of said Annie Warren Williams~~; and, the further sum of $_____ for a partial payment on account of the costs of this suit:

And on the further motion of the said Annie Warren Williams, ~~who sues etc., by her counsel~~, an injunction is hereby awarded enjoining and restraining the said Jessie Williams and, or any other persons from in any manner molesting, or interfering with the said complainant, or restraining her ~~in his custody~~, or in any ways exercising any manner of control or authority over her.

And it appearing to the Court that the said Annie Warren Williams is the wife of the said Jessie Williams, and is without means; and it further appearing that this is a case in which bond should not be required the foregoing injunction is awarded to take effect without bond being required of the complainant.

And it is ordered that a copy of this decree be forthwith served upon the said respondent.

A copy, teste:

_____
Clerk

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

Annie Warren Williams, who sues, etc.

V) Chancery NO 568

Jessie Williams,

Notice of Decree
Entered this: 1 April 1929
October 5th. 1929.

Chy. Bk. 8
Page 528

LAW OFFICES
JOHNSON AND STEPHENS
SMITHFIELD, VIRGINIA

The Linden Printing Company, Hartford, Connecticut

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

THE 4th DAY OF OCTOBER, 1929.

Annie Warren Williams, who sues by J. W. Warren, her next friend.

v) Chancery. No_____

Jessie Williams.

This day came Annie Warren Williams, who sues by J. W. Warren, her father and next friend, by counsel, and presented her bill of complaint, duly verified by affidavit, praying for a divorce a mensa and for an injunction, and moved the Court to require the respondent, Jessie Williams, to pay to her, the said Annie Warren Williams, a reasonable sum of money for the maintenance and support of herself, during the pendency of this cause, and a sufficient sum of money to enable her to carry on and prosecute the same and for other relief; and the Court having considered the bill doth adjudge, order and decree that the said Jessie Williams pay unto the said Annie Warren Williams, or to Johnson & Stephens, her counsel, on the 5th. day of each month, after entry hereof, the sum of twenty dollars for her support and maintenance; and, the further sum of fifty dollars for a partial payment on account of the costs of this suit;

And on further motion of the said Annie Warren Williams, an injunction is hereby awarded enjoining and restraining the said Jessie Williams, and, or any other persons, from in any manner molesting, or interfering with the said complainant, or restraining her, or in any ways exercising any manner of control or authority over her.

And it appearing to the Court that the said Annie Warren Williams is the wife of the said Jessie Williams and is without means; and it further appearing that this is a case in which bond should not be required the foregoing injunction is awarded to

take effect without bond being required of the complainant.

And it is ordered that a copy of this decree be forthwith served upon the said respondent.

A copy, teste,

R. A. Edwards
Clerk

Not finding the within named Jessie Williams at his usual place of abode I executed the within order by tacking a true copy hereof on the front door of his usual place of abode for delivering home.

Done in Isle of Wight County this the 5th day of October, 1929.

W.C. Whitehurst,
Sheriff

By P. S. Wilkinson D.S.
Deputy Sheriff.

Commonwealth of Virginia,

To the Sheriff of Isle of Wight County — Greeting:

WE COMMAND YOU, That you summon Jesse Williams

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 October, 1929, to answer a bill in chancery, exhibited against him in our said Court by Annie Warren Williams, who sues by J. W. Warren, her next friend,

And have then and there this writ.

Witness, R. A. EDWARDS, Clerk of our said Court, at the Courthouse, this 4th day of October, 1929, and in the 154th year of the Commonwealth.

R. A. Edwards Clerk.

Not finding the within named Jesse Williams at his usual place of abode I executed the within summons by taking a true copy thereof on the front door of his dwelling house, or usual place of abode.

Done in Isle of Wight County this the 5th., day of October, 1929.

W. G. Whitehurst, Sheriff

By H. S. Wilkinson
Deputy Sheriff

Annie Warren Williams, etc.

vs. } CHANCERY NO. 568

Jesse Williams

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 .....*Rules*

19.....

.....*p. q.*

VIRGINIA:

IN THE CIRCUIT COURT OF THE COUNTY OF ISLE OF WIGHT

Annie Warren Williams, who sues by J. W. Warren, her next friend.....Complainant

V. IN CHANCERY - CROSS BILL AND ANSWER OF JESSIE WILLIAMS

Jessie Williams.....Defendant

The Cross Bill and Answer of Jessie Williams to a Bill of Complaint filed against him in the Circuit Court of Isle of Wight County, by Annie Warren Williams, who sues by J. W. Warren, her next friend, Complainant.

This Respondent reserving to himself the benefit of all just exceptions to said Bill of Complaint, for answer thereto, or to so much thereof as he is advised that it is material he should answer, answers and says:

1st. That on the 21st day of July, 1929, the said Annie Warren Williams was married to your Respondent, Jessie Williams; your Respondent does not know her age himself but was told by her that she was sixteen years of age on June 18, 1929. Your Respondent visited his said wife before they were married, treated her with all proper respect and love and was friendly to the members of her family. He sought and received consent to his proposed marriage, before it took place, from the father of his said wife, J. W. Warren, and also from her mother, Jessie Lee Warren. J. W. Warren, her father, went to the Clerk's Office of the Circuit Court of Isle of Wight County, with your Respondent to obtain the marriage license and gave his consent to the marriage; and,

2nd. Your Respondent and his wife, Annie Warren Williams, lived together in peace, love and happiness until Friday, October 4, 1929, after five O'clock P. M., at which time her father, J. W. Warren, came in front of the premises on which your Respondent and his wife were

living, and called out to his daughter, the said Annie Warren Williams, in a very dictatorial manner, saying, "get in this car", and took the said Annie Warren Williams with him in his car away from her husband without any cause or justification whatsoever. At that time she was picking cotton in the field of her own volition, with the mother and father of your Respondent. Before her marriage to your Respondent she had worked from time to time in the field for her father, J. W. Warren. After the marriage she stated that she wanted to help with the work, knowing that her husband was in very moderate circumstances and that he had to work for a living also. She was not compelled or forced at any time to work in the fields of her husband and not even requested or told to do so by her husband. She only did light work from time to time when she wanted to do so and your Respondent does not think that she worked in the field for him on an average to exceed one day per week. She has never complained to your Respondent concerning this work but on the other hand wanted to help him in that way and insisted on doing so; and,

3rd. Your Respondent does not deny that his wife has resided and has been domiciled in the State of Virginia ever since the aforesaid marriage and that she is now domiciled in and is and has been an actual bona fide resident of the County of Isle of Wight, State of Virginia, for at least one year prior to the institution of this suit, as alleged in paragraph No. 3 of the Bill of Complaint; and,

4th. Your Respondent most emphatically and under his solemn oath to this Answer and Cross Bill denies each and every allegation set forth in paragraph No. 4 of the Bill of Complaint filed in this suit. All of these allegations in paragraph No. 4 of the Bill of Complaint are made, as shown by the Bill of Complaint, by J. W. Warren, father of Annie Warren Williams, and not by Annie Warren Williams herself. Your Respondent alleges that these allegations are made up and fabricated without any cause whatsoever by J. W. Warren on account of his personal

animosity towards your Respondent and as a part of the continued efforts of the said J. W. Warren to alienate the affections of your Respondent's wife from him. The said J. W. Warren has tried in every possible way to turn the wife of your Respondent against him, to poison her mind against her husband and to persuade and induce her to leave her husband without any cause whatsoever. Your Respondent specifically denies that he has ever been cruel, unjust or harsh to his wife, but on the other hand alleges that he has been kind, considerate and loving to her in every way. Your Respondent has never struck his wife or threatened her in any way and there has never been a cross word or quarrel between him and his wife on any occasion or at any time. Your Respondent has never forbid his wife to visit her parents nor even asked her not to do so. On the other hand she has had entire freedom of conduct in every way and has been free to visit her family, either with or without her husband, at any time. Your Respondent has been with her on several visits to her family at her request as a escort for her. Your Respondent visited his wife's home as late as Wednesday, October 2, 1929, and she voluntarily returned with him to his home after that visit. On that occasion, the said J. W. Warren, as has been his custom with many other people, became very abusive and insulting to your Respondent in his (J. W. Warren's) home, without any cause whatsoever and humiliated and embarrassed his own daughter, the said Annie Warren Williams, without any reason whatsoever. On their return home his wife told him that she loved him more than ever and thought more of him than she ever had and continued to live with him as his wife and to cohabit with him. Your Respondent at many times since the marriage has worked for some distance away from his home and on those occasions, as well as the times at which he was working at home, his wife has been free to visit her relatives and neighbors at any and all times. Your Respondent again and further specifically denies that he has ever objected to this or has ever caused his wife to do manual

labor in the fields as set out in the Bill of Complaint in this suit. She was accustomed to helping in the fields before her marriage and did on several occasions voluntarily and freely and at her own request and suggestion help the mother of your Respondent with light work in the fields but not to exceed one day on an average for a week. Your Respondent denies that he has ever kept watch over his wife or that he has ever refused to permit her to leave their premises at any time without his escort, and he further denies that he has ever directed or prescribed or even attempted to direct or prescribe what places she should visit. Your Respondent further alleges that he and his wife have enjoyed each others company and companionship at all times, as would be natural for any newly married couple, and your Respondent has taken her on visits to Norfolk, Ocean View, Morgart's Beach, Suffolk, Western Branch Church and to Church at Windsor. In fact your Respondent took her on some visit practically every Sunday with the exception of one Sunday when her mother was visiting at your Respondent's home.

5th. Your Respondent states that he secured a divorce against Lucy Ellen Williams as shown by an Order of the Circuit Court of Brunswick County, Virginia, entered on September 26, 1927; that he was the Complainant in said divorce suit which was and has always been a matter of public record and public knowledge. Your Respondent further alleges that he moved from Brunswick County, Virginia, to Isle of Wight County, Virginia, in the year 1924, and that he has been residing in Isle of Wight County, Virginia, ever since 1924; that he secured the divorce referred to while he was living at the same place that he now resides on and near J. W. Warren and his family; that he made trips from Isle of Wight County to Brunswick County to testify in that divorce case; that his divorce, which was caused through no fault of his own, was a matter of public knowledge in Isle of Wight County, Virginia,

and was well known to his neighbors and friends, and your Respondent firmly believes that the said J. W. Warren also knew of his divorce before his marriage to Annie Warren Williams, such information and knowledge being generally known throughout his neighborhood, which was the same neighborhood in which J. W. Warren lived. Your Respondent did not specifically bring up the question of his divorce either to J. W. Warren or to his wife, thinking and conscientiously believing that both the said J. W. Warren and Annie Warren Williams well knew of that fact. Your Respondent has not now nor has he ever had any reason to feel in any way ashamed of his divorce, though he regarded it as a sad and unfortunate incident of his life. The records in that divorce suit in the Circuit Court of Brunswick County show that he was the Complainant, that he was faithful and dutiful to the said Lucy Ellen Williams who left him without any cause whatsoever. Your Respondent states and believes that the said J. W. Warren has merely mentioned the matter of his divorce in order to try to prejudice your Respondent in this suit and to humiliate him if possible to do so. The application for the marriage license was made and signed by J. W. Warren as well as by your Respondent. In securing his marriage license your Respondent stated to the Deputy Clerk that he was not married or that he was single, which statement is true, but your Respondent has never understood any question from the Deputy Clerk or Clerk asking whether he had ever been previously married nor was any distinction made to him or to his understanding by the Clerk or Deputy Clerk between a man that was single and had never been married and a man that was single but had been previously married. The application for the marriage license does not show what question or questions were propounded to your Respondent in this connection and the Deputy Clerk who issued this marriage license to him and who questioned him has told him since the institution of this suit that she did not recall this

occasion particularly and did not remember just what was the form of her questions to your Respondent on this subject. Your Respondent has had no intention or desire to mislead the Deputy Clerk or any other person concerning his divorce, but on the other hand has had in his possession a certified copy of his divorce Decree ever since a short time after it was granted so that he could present the same to anyone in case any question should arise about it. On Wednesday, October 2, 1929, on the occasion above referred to and while your Respondent and his wife were visiting at her father's home, and during the insulting and abusive conversation of the said J. W. Warren towards your Respondent, the said J. W. Warren brought up and discussed your Respondent's divorce in a most insulting and offensive manner in the presence of his wife. And after that discussion and information had been given to his wife by the said J. W. Warren, his wife returned to their home with your Respondent and told him that she did not blame him in any way and did not hold the fact of his divorce against him, but on the other hand loved him more than she ever had, and on that same night cohabited with him of her own free will and accord.

6th. Your Respondent most emphatically denies each and every allegation set forth in parpgraph No. 6 of the Bill of Complaint in this suit. At the time this Bill of Complaint was prepared and at all times since the marriage between your Respondent and the said Annie Warren Williams, she has never at any time lived for one moment in fear and dread of any bodily harm in the hands of your Respondent; she has never had any cause or reason to have any such fear or dread. She has never stated to anyone that she had any such fear or dread though she has talked with neighbors alone and with one or more officers out of the presence of her husband. If at this or any later time she may attempt to express any such fear or dread of her husband, such feeling on her part has been or will be brought about entirely

by her father's influence over her, by her father teaching her against her husband without any cause and poisoning her mind against her husband. Your Respondent denies that he has ever been guilty of any cruel or inhuman treatment to his wife or that she has suffered any mental or physical agony on his account. Your Respondent further denies that she is in any debilitated or weak condition due to any treatment on his part or due to any cause whatsoever. Naturally on account of her age she still feels under the influence and control of her father and mother, both of whom have used their full power over her to turn her against her husband.

7th. Your Respondent further alleges that his wife's father. J. W. Warren, is quarrelsome, meddlesome, over-bearing, abusive and constantly in litigation, and that J. W. Warren lives in a series of quarrels and disputes with his neighbors and the public generally with no cause whatsoever other than his own disposition to antagonize practically everybody that he comes in contact with. Your Respondent alleges that while he was living peacefully with his wife that her father, J. W. Warren, made the statements set out in the Bill of Complaint without any cause or justification and without any basis of the fact in order to prevent your Respondent from seeing or having any conversations with his wife and in order to carry out his pre-conceived plan to take your Respondent's wife away from him and leave him no opportunity to make any effort to persuade her to come back to him. Your Respondent is practically without any redress for this grievous wrong done to him by J. W. Warren for the reason that J. W. Warren, so your Respondent is advised and believes, does not own any property whatever and is absolutely insolvent, that what small interest he has in real estate, if any, is owned by his wife, ~~or family~~, and is held in the name of Jessie Lee Warren, wife of J. W. Warren, and that even the real estate that the said Jessie Lee Warren owns is heavily

encumbered and there is serious doubt that she has any equity in it whatever. These facts are stated so that the Court may see and know that the said J. W. Warren is thoroughly irresponsible and no amount of damages for the alienation of your Respondent's wife's affections could be collected out of him. By making the statements contained in the Bill of Complaint and at the same time taking your Respondent's wife away from him without any cause, your Respondent is prevented from seeing or having any conversation with his wife, and the said J. W. Warren is enabled to continue talking to her against her husband and influencing her against her husband at all times. Your Respondent alleges and charges that a further motive on the part of J. W. Warren is not only to get his daughter back to live with him but to try to make money for himself out of this suit. The said J. W. Warren knows that your Respondent is a poor man and has nothing except what he works for but at the same time knows that the father of your Respondent owns a small farm, and the said J. W. Warren is trying and planning to collect money out of your Respondent either by some lump sum settlement or monthly payments of alimony, which he, the said J. W. Warren, would use himself for his own personal purposes, in addition to having his daughter at home with him and securing her work in his fields and about his house for him.

8th. In tender consideration whereof, and forasmuch as your Respondent is without remedy in the premises save in a Court of Equity where matters of this kind are alone and properly cognizable, he prays that the said Annie Warren Williams be made a party Defendant to this Cross Bill and Answer; that a next friend be substituted for J. W. Warren in this suit, who will be some true and real friend of said Annie Warren Williams and who will advise her properly and honestly in the premises; that a guardian ad litem be appointed for her in this suit; that the Complainant, Annie Warren Williams, be required to

answer this Cross Bill in proper person, though not under oath, answer under oath being hereby expressly waived; that proper process issue; that J. W. Warren be enjoined, and restrained from molesting, interfering with or having anything to do with the said Annie Warren Williams, and be enjoined and restrained and forbidden to teach and influence her against her husband or to continue alienating her affections from her husband; that she be permitted to leave the household of the said J. W. Warren and Jessie Lee Warren and return to the home of her husband; that reasonable and fair opportunities be given to your Respondent to see and talk with his wife apart from her parents, either in the presence of an officer or other person or preferably alone between themselves, in order that your Respondent may endeavor to persuade her to return to his home and do what he may to counteract the influence that her father has exerted over her against him; that in the event your Respondent's wife should remain under the influence of her father and continue to live away from her husband, then that a divorce a mensa et thoro be granted to your Respondent against the said Annie Warren Williams on account of her desertion as above set out, but this is asked only in case she refuses to return to him; that the temporary Order granted on the Bill of Complaint be vacated and that your Respondent be not required to pay any temporary or permanent sums for alimony or support, Counsel fees or Court cost; in the event his wife should return to him as he wishes and will try to persuade her to do, with permission of the Court, then your Respondent would respectfully pray in that event that this suit be dismissed at the cost of J. W. Warren personally, who instigated it without the knowledge and consent of the said Annie Warren Williams; that this Answer and Cross Bill be ~~granted~~ treated as such by the Court; that all proper Orders and Decrees may be made; and that your Respondent may have all such further and other and general relief in the premises as the nature of his case may require or to

equity shall seem meet.

Jessie Williams
Respondent.

Holland & Lovelace
Counsel

STATE OF VIRGINIA,
City of Suffolk, to-wit:

Jessie Warren, the Respondent named in the foregoing Cross Bill and Answer, being duly sworn, says that the allegations therein contained are true, except so far as they are therein stated to be on information, and that so far as they are therein stated to be on information, he believes them to be true.

Jessie Williams
Respondent.

Taken, sworn to and subscribed before me, Mabel Jakeman a Notary Public, of and for the city and state aforesaid, in my city aforesaid, this 8th day of October, 1929.

Mabel Jakeman
Notary Public

My commission expires:
April 26, 1930

#569

Annie Warren Williams, who sues by
J. W. Warren, her next friend.....
.....Complainant

V. IN CHANCERY - CROSS BILL
AND ANSWER OF JESSIE WILLIAMS

Jessie Williams.....Defendant

HOLLAND & LOVELACE
ATTORNEYS AT LAW
SUFFOLK, VIRGINIA

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

Annie Warren Williams, who sues by J. W.
Warren, her next friend,

V) Chancery, No. 569

Jessie Williams.

To the Honorable Benjamin Day White,

Judge of the Circuit Court of the County of Isle of Wight, State of Virginia.

Your complainant, Annie Warren Williams, who sues by her father and next friend, represents to the Court the following case, and prays for such relief therein as is equitable and proper:

1. That on the 21st., day of July, 1929, the said Annie Warren Williams, who was Annie Virginia Williams, and who is, at the present time sixteen years of age, became the wife of Jessie Williams, the respondent herein, as will appear from a certified copy of the marriage liscense, issued for the said marriage, attached hereto, and to be read as a part of this, her will of complaint; and,

2. That continuously, from the time of the marriage, aforesaid, up until the present time, the said Annie Warren Williams has continued to live and reside with the said respondent, in the said County of Isle of Wight, State of Virginia; and,

3. That your complainant, the said infant who sues by her next friend, has resided in and has been domiciled in, the State of Virginia, ever since the marriage aforesaid and is now domiciled in, and is, and has been, an actual bona fide resident of the County of Isle of Wight, State of Virginia, for at least one year proir to the institution of this suit; and,

4. That immediately upon the consummation of the marriage aforesaid the said respondent became cruel, unjust, and harsh, to your complainant; that within a few days after the said marriage the said respondent forbade your complainant to visit ~~either~~ her parents, who live only approximately five hundred yards away, except twice weekly, upon the condition that at each visit she be accompanied by the respondent, or some member of his family; that within a very short period of time after this the respondent refused and does so continue up until now, to permit or allow your complainant to visit her parents or relatives or have any manner of social intercourse with any members of her family; that the said respondent has subjected and caused your complainant to do manual labor, in that she has been forced to work in the fields about the crops; that the said respondent keeps a constant and continual watch over your complainant, not permitting her to leave the premises upon which they reside without his escort, and then only to go to such places as he might direct; and,

5. That your complainant did not know nor understand until after the marriage aforesaid, that the said respondent had been married before and was then divorced; that upon making application for license to wed in response to a question propounded to him by the Clerk of the Court the respondent stated that he was a single man; that your complainant had no knowlege of this until sometime after the marriage; and,

6. That your complainant lives in daily fear and dread of great bodily harm at the hands of the respondent; that because of the cruel and inhuman treatment visited upon her by the said respondent she has, and at the present time is, suffered great mental and physical agony; that becuase of her tender years and general debilitated physical condition your complainant is no longer able to endure the harsh, cruel and inhuman treatment on the part of the respondent, fearing not only for ~~the~~ her physical but for the mental welfare as well; and,

7. In tender consideration whereof, and forasmuch as your

complainant is without remedy in the premises save in the court of equity where matters of this kind are alone and properly cognizable, she prays that the said Jesse Williams be made a party defendant to this her bill of complaint, and required to answer the same, though not under oath, answer under oath being hereby expressly waived; that proper process issue; that the respondent, Jessie Williams, be enjoined, inhibited, and restrained from in any manner molesting or interfering, or having anything to do with your complainant; that she be permitted to leave the household of the said respondent and return to the home of her mother and father; that a divorce a mensa et thoro be granted unto your complainant; that the said respondent Jessie Williams, be, at once, and pending this suit, compelled to pay such sums of money, as temporary alimony, as may be sufficient for the support of your complainant; and, such other sums of money as may be required to pay the costs of this suit and the fees of counsel as may be just and proper, and to secure the regular, safe and prompt payment of the same in such way as to the court may appear effectual; and, that your complainant may have all such further, other and general relief in the premises as the nature of the case may require, or which to equity and good conscience may seem meet.

And your complainant, as in duty bound, will every pray, etc.

Annie Warren Williams who sues by

J. W. Warren

Her next friend.

State of Virginia,

County of Isle of Wight, to-wit:

I, A. E. S. Stephens, a Commissioner in Chancery for the Circuit Court of the County of Isle of Wight, in the State of Virginia, do hereby certify that J. W. Warren, whose name is signed to the foregoing bill of complaint, has, on this day, personally appeared before me in my said county, and made oath that the statements therein contained, which are made from his own knowlege, are true; and that those made which she has obtained knowlege of from others she believes to be true.

Given under my hand this the 4th., day of October, 1929.

R E S Higgins.

Commissioner in Chancery

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

Annie Warren Williams, who sues, etc.,

V) Chancery. No 568

Jessie Williams,

Bill of Complaint

LAW OFFICES
JOHNSON AND STEPHENS
SMITHFIELD, VIRGINIA

The Linden Printing Company, Hartford, Connecticut