

1897-004
Nansemond Co (Suffolk)

Chancery Causes: Louisiona Watkins et al vs Franklin Pierce et al

Daughtrey, Wyatt, Eley, Bellard, Holland, Joyner, Hines

The Norfolk Paper Box Co.

50 and 52 PLUME ST.

NORFOLK, VA.



M. E. E. Holland
Suffolk,
Va.



THE FARMERS BANK OF NANSEMOND,
SUFFOLK, V A.

In account with

Wyatt & Holland
Shil Commission
Wyatt vs Pierce

The Farmers Bank of Nansemond

Dr.

1896

In account with

Nov 7 Deficit	49500
Dec 19 " "	48450

June 16 } 97
B.

Warrant Holding Co. Cr.
Nansemond, Va. 1896

1896		
Dec 1	paid	
Nov 2	Warrant	28
"	" E. E. Hallard	7675
3	" J. O. Hasler	5
Dec 10	" S. E. Ellis Jr	2574
1897		
Mar 2	" W. Kelly Gann	25
May 5	" J. B. Primmett	2282
5	" R. B. Prentiss	2441
5	" A. P. Lanner	1085
5	" W. Kelly Gann	20
5	" Hallard & S	445
5	" R. B. Prentiss	2029
5	" E. E. Hallard	2566
5	" "	3305
5	" S. Pierce	135
		25700

Forward, 95950

95950

1894

May 5

Chas. H. Russell

15

" 23rd Daughters

459

5039

45013

45950

95950

**REMAINING
PAGES IN
VOLUME ARE
BLANK AND
HAVE NOT
BEEN
REFORMATTED**

WILLIAM MANN CO.
No. 529 Market Street,
PHILADELPHIA.



1896

Farmers Bank of Nansemond

SUFFOLK, VA.

In Account with

Holland & Hyatt & Co
Citizens

Always bring your Book with Deposits.
See that the Entries agree with your Tickets.
Please leave your Book once a month for bal-
ancing.



Pr 1896 Farmers Bank of Nansemond

In Account with

DEPOSITS

Chas Lupt

47.51

1897

Jan 19

484.50

959.50

16049

799.01

Holland & Wyatt & Co. Cr. Commrs

CHECKS

28

1675

2574

25

16049

**REMAINING
PAGES IN
VOLUME ARE
BLANK AND
HAVE NOT
BEEN
REFORMATTED**



No. _____

SUFFOLK, VA.

May 5th 1897

FARMERS BANK OF NANSEMOND

PAY TO THE ORDER OF R. R. Prentiss, Atty (Columbus Buggy Co)

Twenty

27/100

DOLLARS

to have paid to W. C. Wyatt

W. C. Wyatt

Shelbourne

\$20.²⁷

E. E. Haeckel

Watkins & Pierce

Credit
M. J. H. H. H. H. H.

No. _____

SUFFOLK, VA. May 5

1897

FARMERS BANK OF NANSEMOND

PAY TO THE ORDER OF Ballard & Smith

Four & 45/100

DOLLARS

M. K. P.'s c/o

\$4.45

W. L. Wyatt, } The Comm
E. Hall and } Watkins & Pierce

William Smith

—

No. _____ **SUFFOLK, VA.** *May 5th* 189*7*

FARMERS BANK OF NANSEMOND

PAY TO THE ORDER OF *W. J. Kilby Comm^r*

Twenty **DOLLARS**

\$20⁰⁰

*W. C. Wyatt, J. H. Corns
E. E. Hareland J. Watkins & Pierce*

W. J. Kilby, Coun.
for a Brown

No. _____

SUFFOLK, VA.

May 5th 1897

FARMERS BANK OF NANSEMOND

PAY TO THE ORDER OF

A. P. Ginner Clerk

Draws ⁸⁵ 100

DOLLARS

clerk's & Sheriff's fees

\$102⁸⁵

W. C. Wyatt } Shl Commrs
O. H. Haeand } Dathmors Pierce

A. P. Gomey Clerk

No. _____

SUFFOLK, VA. May 5th 1897

FARMERS BANK OF NANSEMOND

PAY TO THE ORDER OF R. R. Prentiss, Atty (Smith, Worthington & Co)

Twenty four & 41/100 DOLLARS

in part of \$1000.00

\$ 24.41

W. C. Wyatt } Spk Commr
E. E. Hoecand } Walker & S. Pierce

Genl
R. I. Atkins
Atty.

1860

No. _____

SUFFOLK, VA.

May 5th 1897

FARMERS BANK OF NANSEMOND

PAY TO THE ORDER OF

R. D. R. Carter, Atty.

Fifty two + ³⁷/₁₀₀

DOLLARS

\$52 ³⁷/₁₀₀

W. E. Wyatt, the Commr
E. E. Kocenda } Waltham Pierce

RA Rawls atty

~~RA Rawls~~

No. _____

SUFFOLK, VA. May 5th 1897

FARMERS BANK OF NANSEMOND

PAY TO THE ORDER OF J. N. Langhrey

Four hundred & fifty & ¹³/₁₀₀ DOLLARS

\$450.¹³/₁₀₀

W. C. Wyatt. } Shel Combs
E. E. Hoggan } Walthers & Pierce

T. S. Daughtrey

T. G. Daughtrey

J. V. Vincent

No. _____ **SUFFOLK, VA.** *May 5TH* 189*7*

FARMERS BANK OF NANSEMOND

PAY TO THE ORDER OF *E. E. Holland Atty*

Twenty five & ⁶⁶/₁₀₀ **DOLLARS**
Cost of Fee 18th Cent. *W. E. Wyatt.* *Spk Commr*
\$25⁶⁶/₁₀₀ *E. E. Holland* *Watkins & Pierce*

Eschmunda

No. _____

SUFFOLK, VA.

May 5th 1897

FARMERS BANK OF NANSEMOND

PAY TO THE ORDER OF

E. E. Holland, Atty for John King

Thirty-three ⁰⁵/₁₀₀ ——— DOLLARS

\$33⁰⁵/₁₀₀

Wm Wyatt, Cashier
E. E. Holland, Atty
Watkins Pierce

P. C. Kalandau

No. _____

SUFFOLK, VA. May 5th 1895

FARMERS BANK OF NANSEMOND

PAY TO THE ORDER OF

Franklin Pierce

One hundred & thirty five

DOLLARS

Watkins Pierce

W. G. Wyatt.

The Commr

\$135 00

E. E. Hall and Watkins Pierce

Franklin Pierce.

No. _____

SUFFOLK, VA.

May 5

1897

FARMERS BANK OF NANSEMOND

PAY TO THE ORDER OF

Geo. B. Primer, Atty. A. A. Oliver,

Twenty two + ⁸²/₁₀₀

DOLLARS

Subscribed in N. C. May 1897

W. C. Wyatt

J. H. Crum

\$22⁸²

E. E. Seeland

J. D. Thurman (Secy)

John B. Primmer
Attorney for
H. H. O'Neill

John B. Primmer
Attorney.

No.

Suffolk, Va., Nov 2nd 1896

Farmers Bank of Mansfield

Pay to W. C. Hyatt & E. E. Horeland or order,

Ninety eight Dollars.

\$28⁰⁰

W. C. Hyatt }
E. E. Horeland } 25¹⁰⁰ ¹⁰⁰ Corners
Watkins & Pierce

H. L. Hyatt
E. E. Halloway

No.

Suffolk, Va., Nov 3rd 1896

Farmers Bank of Hansemond

Pay to E. E. Holland, Atty or order,
Seventy six ⁷⁵/₁₀₀ Dollars.

\$76 ⁷⁵/₁₀₀

W. L. Wyatt. } Special Comm¹⁰⁰
E. E. Holland } Watkins & Pierce

E. E. Halland Atty

The Farmers Bank of Vanshemond

No. Pay to the order of

\$5⁰⁰/₇

J. W. Storer Cr.

Five

Dollars

Suffolk, Va. Nov 3

1896

H. L. Hyatt
E. E. Starnes

The Comrs
Waltham & Pierce

J. Walcott

1898.
1896
1897
1898
1899
1900

12.97
12.77
23.74

The Farmers Bank of Vanshemond

Pay to the order of

A. J. Ellis & Son

\$25⁷⁴

Twenty five & 74/100

Dollars

do: Taxes

W. L. Hyatt

The Farmers

Suffolk Va. Dec 10th 1896

E. E. Hadden

W. L. Hyatt & Son

S. J. Ellis Esq To

No.

Suffolk, Va., Mar 2 1897

Farmers Bank of Mansfield

Pay to W. J. Kilby Comm^r

or order,

Twenty five

Dollars.

\$25.00

W. L. Wyate
E. E. Holland

100
The Comm^r
Watkins Pierce

W. J. Kilby, Comr,

INSURE IN THE



Imperial

OF LONDON

W. C. Wyath, per

Columbus Buggy Co = 20.27

Smith, Waddington Co 24.41

A. A. O'Neil 22.82

\$67.50

INSURE IN THE



Imperial

OF LONDON

Geo. King =	33.05
Ball and Smith =	4.45
	<u>37.50</u>
W. J. Kill	20.00
	<u>57.50</u>
A. P. Jones	9.85
	<u>67.35</u>
Sheriff	1.00
	<u>68.35</u>
W. C. W.	67.50
	<u>135.85</u>
Frank Pierce =	135.00
	<u>270.85</u>
Rawles, Atty Ld.	52.37
	<u>323.22</u>
J. H. Doughty	450.13
	<u>773.35</u>
E. L. W. Atty Henderson	25.66
15 Barton 15 th sent	<u>\$799.01</u>

FARMERS BANK OF NANSEMOND.

SUFFOLK, VA., *June 16* 189*7*

She
Miss *Myrtle Holland* *Cousin's* *Statement* vs *Prize*,

We return herewith your Pass Book written up to and including *June 16* 189*7* Please examine, and if found correct, sign and return this acknowledgment. If any errors are found note the same on the reverse of this sheet and return at once.

Yours truly,

WILLIAM H. JONES, JR., Cashier.

By *Briny* Book keeper.

TO THE FARMERS BANK OF NANSEMOND, SUFFOLK, VA

Your statement of *June 16* 189*7* account up to and including *June 16* 189*7*, showing *account closed* ~~balance to~~

~~credit~~ on that date \$....., is received, examined and found correct, with the exceptions noted on the reverse of this sheet.

Signature.....

account closed

COUNTY OFFICERS.

HON. ROBERT R. PRENTIS.....Judge of Circuit Court
 HON. WILBUR J. KILBY.....Judge of County Court
 A. P. GOMER.....Clerk of Circuit Court
 R. R. SMITH.....Clerk of County Court
 E. E. HOLLAND.....Commonwealth's Attorney
 A. H. BAKER.....Sheriff
 SYDNEY T. ELLIS.....County Treasurer

Clerks' Office
 Nansemond County.

Suffolk, Va.,.....189.....

MacKris & others
 vs In Chancery
 Pierce & others

Costs

A P Gomer Clerk	\$ 9.85
Shff of Isle of Wright	50c
" " Nausd.	50c
Atty & Day	16.50
Commissioner	25.00
	\$ 52.35

A P Gomer Clerk

	52.35
Comm	22.50
	74.85

Mr. *M. L. Watkins*

Dr. *H. C. Watkins & Co.*

1895.

To S. T. ELLIS, Treasurer of Nansemond County, Va.

No.-----	State Tax, 30c. on \$100.	State School Tax, 10c. on \$100.	County Levy, 20c. on \$100.	Parish Levy, 5c. on \$100.	County School Tax, 5c. on \$100.	District School Tax, 5c. on \$100.	County Road Tax, 10c. on \$100.	TOTAL AMOUNT OF TAXES.
No. of Acres <i>3.30</i>								
To Real Estate, value <i>\$1452</i>	<i>436</i>	<i>145</i>	<i>290</i>	<i>73</i>	<i>73</i>	<i>73</i>	<i>145</i>	<i>1235</i>
" Personal Property, value \$-----								
" Income, &c., value \$-----								
" Poll Taxes-----								
Total-----								<i>62</i>
5 per cent. additional-----								<i>1297</i>
Total-----								

Received Payment.
Dec 10th 96

S. T. Ellis, Treasurer.
King

Mr. *W. L. Watkins* Dr.

1896.

To S. T. ELLIS, Treasurer of Nansemond County, Va.

No. <i>829</i>	State Tax, 30c. on \$100.	State School Tax, 10c. on \$100.	County Levy, 20c. on \$100.	Parish Levy, 8c. on \$100.	County School Tax, 5c. on \$100.	District School Tax, 5c. on \$100.	County Road Tax, 10c. on \$100.	TOTAL TAX
No. of Acres <i>330</i>								
To Real Estate, value <i>\$ 11452</i>	<i>436</i>	<i>145</i>	<i>290</i>	<i>116</i>	<i>73</i>	<i>72</i>	<i>145</i>	<i>1277</i>
" Personal Property, value \$								
" Income, &c., value \$								
" Poll Taxes		<i>400</i>					<i>50</i>	
Total								
5 per cent. additional								
Total								

Received payment *30* day of *November* 189*6*

S. T. Ellis Treasurer,
King

Dec 10

Louisa Watkins vs the E E Holland Atty

1895

To A. P. GOMER, Clerk Circuit Court of Nansemond County, Dr.

Tax ~~and~~ ~~Clerk~~ ~~Fees~~ in suit vs Franklin Pierce & J

Sept 5th

P G Daugherty

\$ 1.50

Dec 7/95 Paid

A P Gomer, Clerk.

We hereby severally acknowledge the receipt from W.C. Wyatt and E.E. Holland, Special Commissioners in the chancery cause of Watkins vs Pierce and others the several amounts set opposite our respective names-

E.E. Hall and Atty lint-tax &c	16.50
Suffolk Herald	5.25
Deed	5.00
W.C. Wyatt } E.E. Hall and } Commissions	28.00
J. Walcott Davis Clerk	5.00
Wilbur J. Kilby, Comr. -	\$25. ⁰⁰

Holland
May 5th, 1897-Received of E.E. and W.C. Wyatt, Special Commissioners, in the
Chancery suit of Watkins vs Pierce and others the several sums set oppo-
site our names:

In full of Judgment in my favor as assignee vs

Watkins reported by Commr. Kilby

J H Daughtrey \$382⁶³

In full of my interest as one of the heirs-

J H Daughtrey \$67⁵⁰

In full of my interest as one of the heirs-

\$135⁰⁰

Franklin Pierce.

\$52³⁷

R H Daughtrey

for Louisiana Watkins

Clerk Fees \$9.⁸⁵, Sheriff's fees \$1.⁰⁰

A. P. Somers Clerk \$10.⁸⁵

Ball and P. Quirk,

4.⁴⁵

In part of judgment \$22.⁸² A. A. O'Neill by J. D. Prinen Atty

On account judgment Smith & Worthington Co. \$24.⁴¹

On account judgment Columbus Buggy Co. \$20.²⁷

Wilbur J. Kilby, Comr. in Chy. \$20.⁰⁰

150
5-62
712

Martha J Pierce & T H Daughtry &c E E Holland Atty

1895-

To A. P. GOMER, Clerk Circuit Court of Nansemond County, Dr.

Tax and Clerk Fees in suit vs T H Daughtry

Nov 20th

Franklin Pierce & others \$ 7,12⁵

Dec 7/95

Recd

A P Gomer

, Clerk.

Shert & Deaf Wright \$1,00

rec'd & com'd J. Kilby

1897, May 18th-Received of W.C.Wyatt and E.E.Holland, Special Commissioners in the Chancery suit of Watkins and others vs Pierce and others the sum of Thirty three dollars and five cents (\$33.05) in full payment of claim against the estate of M.Kittie Pierce reported by Wilbur J.Kilby Commissioner.

John Keeg Thaux

THE NORFOLK PAPER BOX COMPANY

(INCORPORATED.)

T. H. DAUGHTREY, Pres't &
Manager.

Norfolk, Va.

Nov. 21/1896

Mr. D. S. Holland,
Suffolk, Va.

Dear Sir:

Enclosed herewith papers which have
been signed.
Some time ago I signed a bond in
your office, which you will kindly
send to me.

Yours truly,
T. H. Daughtrey -

To the Clerk of the Circuit Court of Nansemond County:

Lousiana Watkins, and M.L. Watkins, her husband, W.C. Wyatt and T.H. Daughtrey-
VS)

Franklin Pierce and T.G. Daughtrey-

Issue summons in chancery to Rules on 3rd Monday in Sept. 1895. Send summons for Franklin Pierce to Sheriff Isle of Wight County.

Tax \$1.50

E. E. Hoeland,
p. qf.

50¢ to pay Sheriff of Isle of Wight County

CHANCERY SUMMONS.

The Commonwealth of Virginia,

TO THE SHERIFF OF ^{Isle of Wight-}~~NANSEMOND~~ COUNTY, GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

Franklin Pierce
and S. G. Daughtey

to appear at the Clerk's Office of the Circuit Court of Nansemonnd County, at the Rules to be held for the said Court, on the *Third* Monday in *September 1895*, to answer

a Bill in Chancery, exhibited against *them*
in the said Court by *Lousiana Watkins and*
M L Watkins her husband
W. Wyatt and S. G. Daughtey

and have then and there this summons.

Witness, A. P. GOMER, Clerk of our said Court, at his office, this *5th* day of *September*, 189*5*, in the 12*0*-th year of the Commonwealth.

A copy—Teste:

Teste:

CLERK.

CLERK.

not finding the within named
at his usual place of abode
& ~~therein~~ a copy of the
Summons to the Mary F Pierce
wife of Franklin Pierce & ex-
plaind the purpose of the same
Sept 11th 1895

Ro A. Edwards Shff

E. C. Holland p. 9.

Louisa Watkins
& M. L. Watkins vs. Thos

vs. } In Chancery.

Franklin Pierce &
J. G. Daugherty

1895

September Rules.

Third Monday.

Nansemond Circuit Court.

Process Book No. 2

Page 120

CHANCERY SUMMONS.

The Commonwealth of Virginia,

TO THE SHERIFF OF NANSEMOND COUNTY—GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

Franklin Pierce
and J G Daughtrey

to appear at the Clerk's Office of the Circuit Court of Nansmond County, at the Rules to be held
for the said Court, on the *Third* Monday in *September 1895*, to answer

a Bill in Chancery, exhibited against *them*
in the said Court by *Louissiana Watkins and*
M L Watkins, her husband, W C Wyatt
and J N Daughtrey

and have then and there this summons.

Witness, A. P. GOMER, Clerk of our said Court, at his office, this *5th* day of
September, 189*5*, in the 12*0*th year of the Commonwealth.

A copy—Teste:

CLERK.

Teste:

A P Gomer, CLERK.

Executed This 6th day of Sept 1895
by delivering a True Copy of the
Within Process to J G Daugherty
in person
J H Baker
Sheriff

E E Allard

p. q.

Louisa Mathis &
M L Mathis vs. the

vs.

In Chancery.

Franklin Pierce &
J G Daugherty

1895

September Rules.
Shind Monday.

Nansemond Circuit Court.

Process Book No. 2

Page 120

The Commonwealth of Virginia,

TO THE SHERIFF OF NANSEMOND COUNTY—GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON *Alexander H. Baker Sheriff*
of Nansemond County and Administrator of the
estates of William Pierce Sr. and M. Kilty Pierce
deceased.

to appear at the Clerk's Office of the Circuit Court of Nansemond County, at the Rules to be held
 for the said Court, on the *First* Monday in *March 1897*, to answer
The petition ~~Bill in Chancery~~, exhibited against *him and filed by M. L.*
Watkins, agent,
 in the ~~said Court~~ by *suit in Chancery pending in our*
said Court between Louisiana Watkins and
others, Complainants, and Franklin Pierce
and others, Defendants.

and have then and there this summons.

Witness, A. P. GOMER, Clerk of our said Court, at his office, this *17th* day of
February, 189*7*, in the 12*th* year of the Commonwealth.

A copy—Teste:

Teste:

CLERK.

CLERK.

I hereby accept sufficient and legal service
of this summons this the 18th day of February 1897

Attest
A. H. Baker Sheriff and
I am William Pierce Sr. and
M. Kitty Pierce

R. A. Rawles p. q

M. L. Watkins Agent

vs. } In Chancery.

Alexander H. Baker Sheriff

Admr & c

1897--

March Rules.

First Monday.

Nansemond Circuit Court.

Process Book No. 2

Page 146.

Know All Men by These Presents, That we *William C Wyatt*
and Lydia P Wyatt his Surety and Edward E
Holland and William H Jones Jr his surety

are held and firmly bound unto the COMMONWEALTH OF VIRGINIA in the just and full
sum of *Two Thousand* DOLLARS,
to the payment whereof, well and truly to be made to the said Commonwealth, we bind ourselves,
and each of us, our and each of our heirs, executors and administrators, jointly and severally,
firmly by these presents.

And we waive the benefit of our exemption as to this obligation, and also waive any claim
or right to discharge any liability to the said Commonwealth arising under this bond, or by virtue
of the office, post or trust herein mentioned, with coupons detached from bonds of said Common-
wealth.

Sealed with our seals, and dated this *27th* day of *May* in the year
of our Lord one thousand eight hundred and ninety *Six*, and in the *120th* year
of the Commonwealth.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That whereas *in*
the Chancery suit pending in the Circuit Court
of Nansemond County entitled Louisiana
Watkins and others vs Pierce and others
entered on the 14th day of April 1896 W C Wyatt
and E E Holland were appointed Special Com-
missioners to make sale of certain real estate
therein mentioned. Now if the said W C Wyatt
and E E Holland Special Commissioners shall
faithfully discharge their duties under said
decree or any other decree entered in said cause
then this obligation shall be void, but other-
wise shall remain in full force and effect;

W C Wyatt SEAL
Lydia P Wyatt SEAL
Edward E Holland SEAL
Wm H Jones Jr SEAL
SEAL

In the office of the Clerk of the *Circuit* Court of Nansemond County, on
the *27th* day of *May* 189*6*

The above bond was executed and acknowledged by the obligors (the sureties justifying
on oath as to *their* sufficiency) and recorded.

A copy Teste:

Teste:

A P Gomez Clerk

A P Gomez

CLERK.

W. C. Wyatt and
E. C. Holland
To } Spec. Comr. Bond
The Commonwealth,

1896
May 27th.

Recorded in Circuit-
Court Bond Book
Number One Page 114.

To the Hon. Robert R. Prentiss, Judge of the Circuit Court of Nansemond County-

The undersigned Commissioners appointed by decree heretofore entered in the chancery cause of Louisa Watkins and others vs Franklin Pierce and others beg to report that they have sold the lands in the bill and proceedings mentioned, have made to the purchaser therefor as directed by decree of October 20th, 1896, a deed for said property, and have distributed the proceeds of sale as directed by decrees of October 20th, 1896, and also of April 21st, 1897, as follows:

To amt of proceeds of sale, with interest-	\$959.50	
By commissions retained	\$ 28.00	
By fee allowed by decree Oct. 20, 96	50.00	
By writ tax-tax and taxed fee	16.50	
By amt to Suffolk Herald for adv.	5.25	✓
By fee for deed	5.00	
By amt paid J. Walter Hosier Crier	5.00	✓
By amt paid W. J. Kibby Commr	25.00	✓
By taxes paid years 1895/6	25.74	✓
By amt paid T. H. Daughtrey in full judgment	382.63	✓
By amt paid T. H. Daughtrey, his share-	67.50	✓
By amt paid Franklin Pierce	135.00	✓
By amt paid R. H. Rawles, Atty L. Watkins, in full	52.37	✓
By Clerk's and Sheriff's fees	10.85	✓
By amt paid John King in full of acct vs M. K. Pierce	33.05	✓
By amt paid W. J. Kilby, Commr	20.00	✓
By amt paid Ballard & Smith, acct vs M. K. Pierce	4.45	✓
By amt paid E. E. Holland, (by consent) in full costs (1 st suit)	25.66	✓
By amt pd A. A. O'Neil on judgt vs W. C. Wyatt	22.82	✓
By amt pd Smith, Worthington & Co on judgt vs W. C. W.	24.41	✓
By amt pd Columbus Buggy Co on judgt vs W. C. Wyatt	20.27	✓
	<u>\$959.50</u>	

Your Commissioners returns herewith vouchers for the several items above mentioned. There is nothing further to dispose of in this suit.

Respectfully submitted,

E. E. Holland
W. C. Wyatt

Virginia:

In the Circuit Court of the
County of chausemond,

Louisiana Watkins sal.

Against

} In Chancery

Franklin Pierce sal.

To Honorable Robert R. Prentiss,
Judge of the Circuit Court of the
County of chausemond:

In pursuance of the decree
of the Circuit Court of the County
of chausemond, Virginia, pro-
nounced on the 20th. day of
October 1896 in the Cause in
Chancery in said Court depend-
ing between Louisiana Watkins,
Mills L. Watkins and others, Com-
plainants, and Franklin Pierce
Talbot G. Daughtrey and others
Defendants, the undersigned,
one of the Commissioners in Chan-
cery of said Court, respectfully
reports to Court as follows:

That after the papers in said

cause had been placed in his hands Your Commissioner proceeded at the request of counsel for the parties to execute said decree and accordingly, on the 12th day of February 1897, issued notices to the parties to the effect that he would proceed on the second day of March 1897 at his office in Suffolk, Virginia, to take, state and settle the several accounts required by said decree to be taken, stated, settled and to the court reported.

That sufficient and legal service of said notice was duly accepted by all the said parties as will appear by the endorsements on the back of the notices herewith returned.

That on said second day of March 1897 Your Commissioner examined Mills L. Watkins, William S. Holland, Edward L. Joyner and James Thomas Hines with reference to the claims

of Louisiana Watkins asserted by her agent and husband, said Mills L. Watkins against the estates of William Pierce, Sr. and M. Kitty Pierce deceased. The depositions of said witnesses are herewith returned.

That the result of the proceedings before Your Commissioner is as follows:

Account No. 1

An Account of the debts due by the said William Pierce Sr., or his estate with their respective dignities and priorities.

Your Commissioner has not been able to ascertain any debts against the said William Pierce, Sr. or his estate due by any express contract made with said William Pierce, Sr. and is of the opinion that there are none; but Louisiana Watkins, daughter of said William Pierce Sr. has filed her Petition in said cause asserting a claim to compensation for the care, maintenance

and support of her father during the period from November 1890 to February 1894; - such claim being for the sum of \$600 subject to a credit of \$25. While it does not appear that there was any express or implied contract for the payment of this compensation, still your Commissioner is of the opinion that some compensation, though not as much as she claims, should be allowed Mrs. Watkins, to be paid out of her father's estate, in view of the more than ordinary circumstances surrounding the case, Mr. Pierce was old and decrepit, in fact, practically an invalid, especially during the last six months of his life, requiring ^{the} extra attention and care bestowed upon him by Mrs. Watkins. In view of all this and the facts developed by the testimony herewith returned, your Commissioner thinks Mrs. Watkins should be allowed about the gross sum of two hundred (200)

without interest,
dollars, for all that she did
for her father during the time
he was dwelling with her ~~with-~~
~~out interest~~, and, therefore, re-
ports accordingly, the same to
be paid out of funds under
the control of the Court in this
cause; said sum of \$200 to be
in lieu and in full of all
her claims and demands
asserted in her said Petition
against her father's estate.
There is no other claim a-
gainst the estate aforesaid,

Account Chs. 2

An Account of the debts due and
owing by M. Kitty Pieree or her es-
tate with their respective dignities
and priorities.

Your Commissioner reports ~~a~~
~~debt~~ under this ^{head} of the
first class due John King
for coffin furnished for the
burial of said M. Kitty Pieree,
amounting to the sum of - \$30.00
upon which interest is due
and payable from 26 Augt. 1895

and a debt of the fifth class due Ballard and Smith for articles charged in a retail store account amounting to the sum of - \$4.03 upon which interest is due and payable from the first day of July 1895.

In addition to these claims Your Commissioner reports that the claim of one hundred (100) dollars asserted by Louisiana Watkins in her said Petition for the care, maintenance and support of said M. Kitty Pierce for the period of about one year and half is reasonable and should be allowed. The same is, therefore, reported accordingly to be paid ^{without interest} out of her estate in its proper order. The grounds for the allowance of this claim are fully stated in the testimony herewith returned and are practically the same as those upon which the claim of said Louisiana Watkins, mentioned above, against

her father, are based.

There is no other claim against the estate of said M. Kitty Pierce.

Account No. 3

An Account of the transactions of Alexander H. Baker, Sheriff, and administrator of the estate of ~~the~~ ~~estate of~~ William Pierce Sr. deceased.

No personal estate of any kind belonging to said William Pierce Sr. has come into the hands of said Administrator and there is none in existence. The said administrator has, therefore, no account to render.

Account No. 4

An Account of the transactions of Alexander H. Baker, Sheriff, and administrator of the estate of M. Kitty Pierce, deceased.

No personal estate of any kind belonging to said M. Kitty Pierce has come into the hands of said Administrator and there is none in existence. The said adminis-

By agreement between the said Louisiana Watkins and her counsel, the latter is to have a fee of twenty-five dollars to be paid out such sum of money as may be decreed to her.

trator has, therefore, no account to render.

Account Ch. 5

An Account of any matter specially stated deemed pertinent by myself, or required by any party to be so stated.

Your Commissioner has no report to make under this head except to say that the note of M. L. Watkins for \$287.⁸⁶ payable to William Pierce, Sr. and filed as Exhibit Ch. 2 with the depositions herewith returned, and the bill for \$178.⁶¹ filed as Exhibit H. with the Petition of said Louisiana Watkins in said cause, being both barred by the statute of limitations. Your Commissioner has not considered them at all in the conclusions reached by him and stated in this report. #

Respectfully submitted this second day of March 1897.

Wilbur J. Kilby,
Commissioner in Chancery.

Court's fee \$20.00
Ed. Beale, Type-writer 2.50

All Goods Shipped at Risk of Consignee, Unless Otherwise Specially Stated in Writing. We Are Not Responsible for Loss or Damage in Transportation.

Windsor, Va., *Aug 25* 1897

Mrs. Kizzie Pierce's Estate

Bought of JOHN KING, Prop'r Windsor Mills,

1895

TERMS--CASH.

Sight Draft Payable on Arrival of Goods.

Wholesale Dealer in Virginia Peanuts.

Aug 26 To Coffee & Beans

3000

Inc 6% to be

275

3275

Suffolk, Va.,

189

Miss Kittie Green,

Bought of Ballard & Smith,

Dry Goods, Notions, Shoes, Hats, Carpets, Mattings, &c.

1893. All bills must be settled in sixty days. Interest charged on over-due accounts.

May 27	4 ² yds Silk	75	Self
" "	2 " " " "	12	"
" "	2 " " " "	"	"
" "	W B. Casing		
" "	Hoke Tyler		

338
25-
20
15-
15
<u>\$408</u>

MRS. B. T. CARR,
—DEALER IN—
FANCY AND FAMILY GROCERIES,
CONFECTIONERIES, FRUITS, ETC.

Proprietor of Carr's Boarding House.

Special Rates to Transient Boarders.

Windsor, Va. Apt 22nd 1895

Mr. C. Wyatt Esq.

Suffolk

Dear William

I am informed
by Mr. W. S. Holland that
Mr. Pierce offered \$600. for all
the interests in the Low Pierce
land, and that you and
Harry have decided to accept
the offer. As you represented
Kittie's interest in our meeting
I suppose you do so still, and
that she is willing also to accept
the offer.

If this is the ultimatum
in price we will also accept

Ex libris - "No. 1"

MRS. B. T. CARR,
—DEALER IN—
FANCY AND FAMILY GROCERIES,
CONFECTIONERIES, FRUITS, ETC.

Proprietor of Carr's Boarding House.

Special Rates to Transient Boarders.

Windsor, Va. 189

with the express understand-
ing that the note which
some one of the family holds
for \$287. against me shall
be cancelled by our agree-
ment. Your Grand Pa for board,
services &c.

If this suits all
your views please write at
once and let's fix the matter
up before it gets cold -
Trusting, I understand is oak
Hope all are well -

Yours very truly,
W. L. Watkins

Exhibit ch. 1

W. J. Kilby, Counr.

2 March 1897

Exhibit No "1"

\$287.⁸⁶

Windsor, Va., Jan. 27th 1882

On demand ~~Days~~ after date I promise to pay unto
Jm. Pince Sn. or Order, negotiable and

payable at **The Bank of Windsor,** in Windsor, Virginia, without

offset, Two Hundred Eighty-Seven ¹⁰⁰ 86 DOLLARS,

for value received; and we, maker and endorsers, hereby waive the benefit of our
Homestead Exemption as to this debt.

Credit the maker.

M L Watkins

Exhibit No. 2

M. J. Kilby, Comr.,
2 Mar, 1897

Exhibit "2"

In the Circuit Court of the County of Nansemond ~~of~~ Va.

Louisiana
~~Louisiana~~

Watkins and others

Complain~~x~~ants

Against¹

In Chancery

Pierce ~~Daughtrey~~ and others

Defendants

The Depositions of Mills L. Watkins and others taken before Wilber J. Kilby a Commissioner in Chancery of the Circuit Court for the County of Nansemond in the Town of Suffolk, on the 2nd day of March 1897

to be read as evidence in behalf of the ^{*Petitioner,*} ~~Petitioner~~ Mills L. Watkins, ^{*Agent*} ~~Agent~~ in the Suit in Chancery depending in the said Court between ^{*Louisiana*} ~~Louisiana~~ Watkins and others, Complainants, and ^{*Franklin Pierce*} ~~Talbot G. Daughtrey~~ and others, Defendants,

Present: R. H. Rawles, Counsel for ^{*to*} ~~Petitioner~~

E. E. Holland, Counsel for Defendants

Mills L. Watkins, being duly sworn, deposes and says as follows:

Q What is your age, where do you reside, and what is your occupation, and do you know the parties to this Suit?

~~A~~ Before the witness answers this question Counsel for the Defendants except ~~to~~ ^{*to*} his ~~competency~~ *competency*.

A. M. L. Watkins, 54 years, Windsor Va. Lumber business and I know all the parties to the Suit,

Q Will you state whether or not you are the agent of Mrs ^{*Louisiana*} ~~Louisiana~~ Watkins and if so how ^{*long*} ~~long~~ have you been acting as such ^{*agent*} ~~agent~~?

A I am her agent and have been acting as such since ~~1883~~ ^{*1883*},

Q I notice that in the Suit styled *Watkins vs. Pierce* and others Mrs ^{*Louisiana*} ~~Louisiana~~ Watkins has filed against the estate of William

~~Pierce~~ deceased a claim for \$575. State, if you can, the nature of this claim what it is for and all that you may know about it.

A, Mr Pierce was sent to my wife's house about Oct 1890 from which time and until his death Mrs ^{*Louisiana*} ~~Louisiana~~ Watkins, my wife, ^{*and roomed*} boarded ^{*room*} him, furnished ^{*him*} ~~him~~ for ~~him~~ and clothed him with exception of \$25. furnished Mrs ^{*Louisiana*} ~~Louisiana~~ Watkins by Dr Pierce. The first year Mr Pierce was not so much

troubled ^{*mind*} ~~although~~ we could perceive that his mind was impaired and after the first year his ^{*mind*} ~~mind~~ became so much impaired that it became necessary for Mrs Watkins to ^{*employ*} ~~employ~~ a boy to look after him both day and night

until his death

Q State his mental condition the last 6 months of his life ;

A His mental condition during the last 6 months of his ~~Life~~ was such as to ~~neccesitate~~^{ces} my consulting Mr W. S. Holland in reference to getting him, Mr Pierce, into an Asylum, his mind got worse all the ~~time~~^{time} until he died, so much so that he had to be watched almost day and night ;

Q Can you ~~stat~~ state whether or not his being in this mental condition caused him to be more troublesome and expensive as a ~~boarder~~ boarder and lodger ?

A It did.

Q How much was it worth in your opinion to board and lodge him when he first went there and when his mind was not so bad. I mean ~~per~~^{per} month ?

A My wife had some boarders occasionally for which she charged \$10. per month for board and lodging. Mr Pierce had the same fare the boarders had except the additional expense of washing ?

Q If it was worth this amount to board and lodge him when his mind was ~~clearer~~ clearer how much was it worth to board, lodge wash for him and have him watched during the last 6 months of his life ?

A In the first place if he had not been connected in the family I would not have consented for my wife to have boarded Mr Pierce and had him among my children ; run the risk of having my house burnt up from night to, night for any consideration ~~for~~^{of} Dollars and cents, but under the consideration of the family ties it is worth certainly ~~thr~~ thrice the ordinary board.

Q ~~Then~~ ~~understand~~ ~~you~~ ~~understand~~

Q Do you know whether or not Mrs Louisaⁱ Watkins has been paid any part of this bill of \$600 for said services except the \$25. you have already mentioned

A Not to my knowledge

Q Do you desire ~~or~~ can you give us any more ~~information~~^{information} in regard to this claim of \$600 which she has filed with her petition ?

A I know nothing more than ~~what~~^{what} I have already stated

Q Mrs Watkins in addition to the claim of \$600 has also filed with her ~~petition~~ petition a claim of \$ 178,61 which she has marked exhibit ~~8~~^H against the said esstate. Which I now hand you and ask you to tell all you may know ~~about~~ about it

A In 1881 I think I gave Mr William Pierce my note for balance of money due on a certain lot of wood, after having given that note the amount appearing on the said paper was paid out. The first amount was paid for a mule which was furnished a man by the name of Craig, the \$15. was the money over paid to Mr Lufsy the \$9. was money paid to woodchoppers - all of which amounts ^{were} ~~was~~ over and above what their work amounted to; the \$44.85 was for money and clothing furnished to Miss Kitty Pierce prior ~~er~~ to Mr Pierce's Death.

Q The Petitioner ^{to} has also filed another claim against the ~~estate~~ ^{estate} of Miss Kitty Pierce for \$100 which is marked exhibit I. Look at this claim and tell us all you know about it ?

A Miss Kitty Pierce made my wife's house her home a greater ^r portion of her ~~x~~ time during which time she was ^{sick} ~~sick~~ and almost ^r an invalid, a ^r portion of her time, and was at my wife house during her last illness which lasted I think about 3 weeks, during which time she had to be nursed, set up with, and have nourishment and what was ^{necessary} ~~necessarily~~ for ill people both night and day.

Q Then can you say whether or not the services were rendered by Mrs Watkins for Miss Kitty Pierce as charged ⁱⁿ ~~in~~ this bill ?

A I Think so.

Q How long was she boarding at Mrs Watkins' house previous to her death ?

A One year, about that.

Q Have you as agent for Mrs Watkins ever received any pay for these services

A I have not, but I will state Miss Kitty had some little wearing apparel ~~and~~ which I understood she wanted one of ^{my} ~~the~~ Daughters to have the value of which was possible \$8. or \$10.

Q When did Mr William Pierce die ?

A I think he died in Jan 1894 ?

Q When did Miss Kitty Pierce die ?

A I think in August 1895.

Q Do you know whether either of them left any personal estate ?

A Nothing that I am aware of.

4

Corss examined by Counsel for Defendant.

Q With-out waiving objection to the competency of this witness who testifies as agent of Louisaⁱ Watkins the Counsel for Defendant proceeds to cross^{ex}amine him^{him}.

Q What relation was William Pierce Senior, to Louisaⁱ Watkins².

A He was her father.

Q Counsel for Defendant here hands witness a letter dated April 2nd 1895 addressed to W. C. Wyatt and requests him to say if he wrote the same.

A Yes Sir I wrote the letter.

Q The letter being identified by the witness is here offered in evidence and marked exhibit #1.

Q At the time this letter was written how many were entitled to share in the proceeds of the William Pierce land².

A 4 I think there were 4 heirs.

Q This letter^{Wattins have} states that Dr Pierce offered \$600 for all the interest² in the William Pierce land, what proportion of this \$600 would Mrs Louisaⁱ have^{Wattins have} received.

A \$150 unless there were some expenses. The \$600 was in addition to any interest Dr Pierce might have had in the land.

Q Then your wife's interest would have been \$200 instead \$150².

A Upon that settle-ment it would have been \$200. I want to state²

that while the letter does not so state² it that there were several considerations which prompted me to write the letter referred to. The first was that Dr Pierce was to transfer certain papers to me. The second was that it was to be a cash contract, but after examination and consultation with Mr W. C. Wyatt and Mr E. E. Holland it was ascertained² that a deed could not be executed on account of judgments against some other parties, and further that I^{had} over-looked the money which I had paid Mr Pierce previous to his death.

Q Did you not in that letter agree that you would accept the \$200^{for} your wife's interest and upon the surrender to you of a note for \$287ⁱ against you, you would cancel the account against Mr William Pierce for board, services and Etc².

A Certainly the letter so states².

5
But for reasons just given I afterwards declined to negotiate further upon the ~~subject~~ *subject*.

Q Was not Mr Pierce dead at the time this ~~letter~~ *letter was written* ~~written~~?

A He was

Q I now hand you your note for \$287, 86 to which you refer in the foregoing letter, and ask if that is the note to which you referred?

A Yes this is the note referred to.

The note being identified is now introduced in evidence and marked exhibit #2

Q Has any part of this note ever been paid

A Yes

Q What part and how

A A ~~\$187. 68~~ *\$178. 61* as shown in exhibit H, and filed with ~~her~~ *my* petition

Q Then the account of ~~fx#187\$178xx61xx~~ *\$178. 61* \$78, 61 has been paid and this note ought to be credited with that amount

A I do so state

Q ~~For what amount~~ *on* which account ought the balance due on this note to appear as a credit?

A On the account of William Pierce Deceased, and marked exhibit G and filed with my petition

Q The land belonging to William Pierce and referred to in your letter sold for \$950, and your wife's interest in the proceeds of the sale is larger than it would have been if you had accepted Dr Pierce's offer ~~then~~ *then* why are you not now willing upon the surrender to you of this note to carry out your ~~agreement~~ *agreement* contained in that letter to cancel all claims against William Pierce for board, services, and etc.

A My ~~answer~~ *answer* is I think I have already answered that question

Q What papers, if any, ~~was~~ *were* to be transferred to ~~you~~ *you* by Dr Pierce in case his offer was accepted

A ~~xxThexxnotexmyxwifexandxxexxx~~

A My wife and self executed two notes payable to Dr Pierce and J. L. Watkins and gave a deed of trust to secure the same , and it was these two notes that Dr Pierce was to indorse to me without recourse, in consideration of my accepting the offer of \$600 which was to have been paid cash . \$30. out of these two notes I owe Dr Pierce , the balance was owing to my Son J. L. Watkins

Q Does Dr Pierce now refuse to make such a transfer of all interest he has in those notes upon the cancellation ^{of} ~~upon~~ the claims ~~you~~ you have filed with your petition against William Pierce estate

A I don't know whether Dr Pierce does or not, but for reasons stated in a ~~former~~ ^{former} answer I refuse to have him do so

Q If he should now consent to make such transfer what claim would you assert, if any, against William Pierce estate

A I Don't consider that there was any such a proposition made and if so I would not entertain it

Q Was there not at the time this proposition was made, Judgements duly docketed in the Clerk's Office of Nansemond County against T. G. Daughtrey and Louisa Watkins for \$740, 64 with a credit thereon of \$403 ⁸⁷ ~~87~~ leaving a balance of \$ 337, 36 in favor of Walter B. Ferguson/ Co.

A I ~~knew~~ ^{such} there was a Judgemnt but I did not know the amount

Q ~~Then~~ ^{Then} you knew that if it was to be a ~~cash~~ ^{cash} contract that the money received by your wife would have to be paid on said Judgement in order to give Dr Pierce a good title

A My answer to this question is I came to Suffolk to see Mr Wyatt in reference to the matter and ascertained from him that there was ~~an~~ a Judgement or Judgements I then went to see Mr Ferguson to ascertain from him if he held the judgement referred to by Mr Holland , and if so how much balance was due on it He informed me that Mr T. H. Daughtrey had paid the balance on the Judgement amounting to ~~something~~ ^{something} over \$300 , I then went to Norfolk and saw Mr T. H. Daughtrey

and ascertained from him what the remaining half of ~~that~~ ^{the} execution was referred to by Mr Holland, and at the same time ~~told~~ ^{told} Mr T. H. Daughtrey that in the event the ~~agreements~~ ^{were complied} applied with that I would pay all my half of the balance on said execution

Q How long if you know ^{did Miss Kitty} reside with Mr T. G. Daughtery

A I have no idea

Q At the time Miss Kitty Pierce resided ^{at} your house did she occupy the position of a regular boarder or did she assist Mrs Watkins in the performance of her house-hold duties

A No Sir she did not occupy the position of a regular boarder , she was an invalid ~~at~~ a good part of the time she was at my house , and did assist in ~~the~~ the house-hold work , although it was ~~vermox~~ ^a voluntary

Q Did not Miss Kitty as his Daughter ^{materially} ~~maturely~~ assist ~~in~~ ⁱⁿ waiting on William ~~am~~ Pierce her farther

A Yes ~~she~~ she did for the last 3 months but she was an invalid and could not do much

Q For how many months did Miss Kitty Pierce stay at your house

A About a year

Q

Reexamined by Counsel for Petition ^{times}

Q In reference to the judgement ⁱⁿ ~~is~~ favor of W. B. Ferguson and Co. is it not a fact that one half of the balance now due there-on is due by Mrs Watkins , and the other half by her Partner T. G. Daughtrey

A I so understand ~~so~~

Q Can you state whether or not ^{the voluntary} ~~th voluntairally~~ services rendered by Miss Kittey Pierce were worth as much as her board and lodging taking into consideration that she was as you have stated an invalid herself during a part of the time

A I did ^{not} regard her ~~her~~ services as worth anything to me or my family though it was a convenience at times

Q Did she render any service during the 3 weeks of her illness

A She did not , but was apparently unconsciously ^s ~~in~~ a portion of the 3 weeks

And further this Deponent saith not.

M. L. Watkins

W. S. Holland being duly sworn deposes and says as follows ;

Q State you ~~name~~ ^{age} , residence occupation and do you know the parties to this Suit

A W. S. Holland 42 years Windsor Va. Attorney and know the parties to the Suit

Q Do you know when and where Mr William Pierce Senior died

A At the residence of Mr M. L. Watkins in Windsor Va. I do not know when

Q Will you please state any thing you may ~~know~~ ^{know} in reference to his mental ~~condition~~ ^{condition} for the 6 or 12 months previous to his death

A I saw very little of Mr Pierce , and could not know anything of ~~his~~ ^{his} mental condition except ~~by~~ by rare and occasional interviews with him On one occasion I saw him when he had lost the way from Mr Watkins' house ~~or~~ ^{to} that of his son Dr Pierce ~~to the other~~. These two residences are about 300 ft apart , and if at that time Mr Pierce had had even ordinary control of his mental ~~faculties~~ ^{faculties} he would ~~have~~ ^{had} not have any difficulty in finding the houses . If I ever saw him in a similar condition more than once I have forgotten it. The time ~~alluded~~ ^{alluded to} was in the day time and I think Mr Pierce Could see as well as other folks of his age ,

Further this deponent saith not.

W. S. Holland.

Edward L. Joyner being duly sworn deposes and says as follows

Q State ~~w~~ your name, age, residence occupation, and do you know the parties to this Suit

A E. L. Joyner, 28 years, Residence ^{formerly} ~~formally~~ Windsor now Isle wight Co, merchant. I Know the parties to this Suit

Q Were you acquainted with Mr William Pierce Senior

A Yes

Q When ~~did~~ and where did he ~~die~~ ^{die}

A He died at Mr M. L. Watkins' in 1894

Q Do you know how long he had been there previous to his death

A In 1891 I went to Mr Watkins to board he was there then. He received same ^{fare} ~~fair~~ as I did at the table. Mr Watkins had a boy ^{employed} ~~employed~~ to look after ^{him} ~~it~~ and during that year he purchased clothing from me several times for him ~~that year~~. That year ^{at night} ~~as~~ ^{he was right} ~~occasionally~~ bad in his room, In 1892 I roomed there ~~occasionally~~ ^{occasionally}. I found that his mind was getting worse, In 1893 I used to room there ~~occasionally~~ ^{occasionally} often we had to get up, put him in the bed by main force and cover him up. Often I ~~waxxxxx~~ I have seen him ^{try} ~~tried~~ to get out ^{the window} ~~the window~~ for the door

Q How much board did you pay when you were at Mrs Watkins

A I Paid \$10.

Q Did this include your washing

A No.

Q In the mental condition in which you have described Mr Pierce to ~~be~~

Can you say whether ~~or~~ not it would be worth more to board and lodge him than it would a person in full ^{s s} ~~posesion~~ ^{his} of all ~~their~~ mental ~~faculties~~

A I Should think it was

Q Can you state how much per month it was worth to board him lodge him nurse him and look after him during the last 6 months of his life

A I think \$25. per month

Q

Further this Deponent saith not.

E. L. Joyner

Jas Thomas Hines being duly sworn deposes and says as follows

Q State your name age ^{residence} ~~residence~~ occupation, and do you know the parties to this Suit

A J. T. Hines Windsor 44 years I know the parties to the suit

Q Were you acquainted with Mr William Pierce Senior

A I was

Q Have you heard the ^{whole} ~~held~~ testimony given in this case by Mr Edward L Joyner and can you fully corroborate the same in all its details

I have heard it and I can fully corroborate ^{it} in all ^{its} ~~its~~ details
Further this Deponent saith not.

James T. Hines

Virginia;

County of Chaussemond, to wit:

I, Wilbur J. Kilby, a Commissioner in Chancery of the Circuit Court for the County of Chaussemond in said State, do hereby certify that the foregoing depositions of Mills L. Watkins, William S. Holland, Edward L. Joyner and James Thomas Hines were duly taken, sworn to, and subscribed before me at the time and place and for the purpose in the caption thereto mentioned.

Given under my hand this 2nd, day of March 1897

*Wilbur J. Kilby,
Commissioner in Chancery,*

James T. Hines being recalled by consent of counsel on both sides, and asked to testify in regard to the claim of Mrs. Louisiana Watkins for ~~\$100~~ \$100: filed against the estate of Miss Kittie Pierce makes the following statement:

I knew Miss Kittie Pierce very well. She lived with Mrs. LOUISIANA Watkins from the ~~death of~~ death of her father William Pierce in January 1894 till ~~to~~ her death in August 1895: about one year and eight months; during all this time she was furnished a home and board by Mrs. Watkins. She was in bad health and what I would call an invalid all this time; not actually confined to her bed but weak and feeble and not able to work.

During the last few weeks of her life she was confined to her bed.

I buried both her and her father.

I think \$100: a very reasonable ^{sum} for Mrs. Watkins to charge for her board lodging and attention/; during the time she remained there. She had the very best attention all the while she was ~~at~~ there.

She might not actually have been there all the time during these twenty months, but this was her home, and while she might have made occasional visits to Mr. Daughtrey and others she was very nearly all the time at Mrs. Watkins'.

But even if she did not remain there but one year I should say that the \$100: was a very moderate and reasonable bill for this time.

X X X X X X X X //

We agree that this statement may be read as a part of the evidence in this case.

R. H. Rawls Counsel for
Petitioner.

E. E. Holland,
Counsel for Plaintiff.

~~Questions for Men Who Voted.~~

~~James T. Hines being recalled by consent of counsel on both sides and~~
~~asked to testify in the case of Mrs. Louisa Watkins for \$100~~

~~age, introduced by contestant, being first duly sworn and cautioned, testifies, in answer~~

~~to questions propounded by~~, as follows:

~~1st Question. State your name, age, residence and occupation~~

~~Answer:~~

~~2d Question. State whether you voted for Congressman from the Second Congressional District of Virginia at the general election held November 2d, 1896, and if so, at what Precinct and in what city or county?~~

~~Answer:~~

~~3d Question. For whom did you vote for Congressman from said district?~~

~~Answer:~~

~~It appears that this statement may be read as a part of the evidence in~~

~~this case.~~

To
Louisiana Watkins, Mills L. Watkins
her husband, William C. Wyatt and
N. Harvey Daughtrey Complainants,

and
Franklin Pieree, Talbot G. Daughtrey and Alex-
ander H. Baker, Sheriff, and administrator
of the estates of William Pieree Sr., decess-
ed and M. Kittie Pieree deceased, Defendants.

You are hereby notified that on the 2nd, day of March 1897
at my office, in Suffolk, Va., (at which time and place you are required to attend), I shall take, state and
settle the following accounts which are to be taken, stated and settled and reported to Court in pursuance of the
decree of the Circuit Court of, Hansemond County, Va., rendered the 20th
day of October 1896 in the suit in chancery pending in said Court to which you
are parties plaintiff & and defendant &, to wit:

1. An Account of the debts due by the said Wil-
liam Pieree Sr., or his estate with their dig-
nities and priorities.
2. An Account of the debts due and owing
by the said M. Kittie Pieree, or her estate
with their respective dignities and priorities.
3. An Account of the transactions of Alexan-
der H. Baker, Sheriff, and administrator of
the estate of William Pieree Sr. deceased.
4. An Account of the transactions of Alexander
H. Baker, Sheriff, and administrator of the es-
tate of M. Kittie Pieree deceased.
5. An Account of any matter specially stated
deemed pertinent by myself, or required by
any party to be so stated.

Given under my hand, as Commissioner in Chancery of said Court, this 12th, day of
February 1897

WILBUR J. KILBY,
Commissioner in Chancery.

We hereby accept sufficient and
legal service of this notice.

My S^r Baker Sheriff and
Attorn of William Pierce and
me Kittie Pierce
Harvey Daughtry
Tolbert G. Daughtry
W. E. Wyatt

To
Lorissiana Watkins, Mills L. Watkins
her husband, William C. Wyatt and
N. Harvey Daughtrey, Complainants.

and

Franklin Pierce, Talbot G. Daughtrey,
and Alexander H. Baker, Sheriff, and
administrator of the estates of William
Pierce Sr. and M. Kittie Pierce,
Defendants.

You are hereby notified that on the 2nd, day of March 1897
at my office, in Suffolk, Va., (at which time and place you are required to attend), I shall take, state and
settle the following accounts which are to be taken, stated and settled and reported to Court in pursuance of the
decree of the Circuit Court of Hansemond County, Va., rendered the 20th,
day of October 1896 in the suit in chancery pending in said Court to which you
are parties, plaintiffs and defendant S, to wit:

1. An Account of the debts due by
the said William Pierce, Sr., or his es-
tate with their respective dignities ~~and~~
and priorities.

2. An Account of the debts due and
owing by the said M. Kittie Pierce or
her estate with their respective digni-
ties and priorities.

3. An Account of the transactions of
Alexander H. Baker, Sheriff, and adminis-
trator of the estate of William Pierce Sr., deceased.

4. An Account of the transactions of Alexan-
der H. Baker, Sheriff, and administrator of the
estate of M. Kittie Pierce deceased.

5. An Account of any matter specially stated deem-
ed pertinent by myself, or required by any party
to be so stated.

Given under my hand, as Commissioner in Chancery of said Court, this 12th, day of
February 1897

WILBUR J. KILBY,
Commissioner in Chancery.

We hereby accept sufficient and
legal service of this notice,

M. L. Watkins ~~for~~
~~Self and Louisiana Watkins~~
Franklin Pierce.
Louisiana Watkins

Watkins & als.

vs. } In Chy.

Pierce & als

Report of debts
under decree of
20 Octo. 1896

1897 Apr 24 Filed

A. J. Gorney Clerk

In the Circuit Court of Nansemond County-

To the Hon. R. R. Prentiss, Judge of the Circuit Court of the County of Nansemond:

The undersigned Special Commissioners appointed by decree entered in the chancery cause of Watkins and others vs Pierce and others on the 14th day of April 1896, beg to report that, after advertising the time, place and terms of sale in the Suffolk Herald, a newspaper published in the Town of Suffolk for two successive weeks and by posted hand-bills they proceeded to sell to the highest bidder, at the front-door of the courthouse of this county, On Monday, June 8th, 1896 (court-day) the real estate in the bill and proceedings mentioned, and that at said sale T. H. Daughtrey made the highest bid therefor and became the purchaser at the price of \$450.00. Nine hundred and fifty dollars. The purchaser has complied with the terms of sale by making the cash payment of \$475. and by giving his bond for the residue payable six months after date with interest from date. Your commissioners return herewith a certificate showing that the cash instalment has been deposited to their credit in the Farmers Bank of Nansemond, and also return herewith the bond given for the credit instalment.

Your commissioners have given the bond required by the decree directing sale and return herewith a copy of the advertisement of sale.

Respectfully submitted,

W. L. Hyatt
E. E. Waller
Spe Commr.

Watkins' and others-

vs-Report of Sale

Pierce and others-

Filed Dec 1, 87 7896

A. P. Gomer Clerk

In the Circuit Court of the County
of Chausemond
Louisiana Watkins & al. Complainants

Against } In Chancery.
Pierce & al. Defendants.

To the Circuit Court of the County
of Chausemond, Virginia;

In pursuance of the decree of
the Circuit Court of the County of Chau-
semond in the State of Virginia pro-
nounced on the 15th day of October
1895 in the Chancery Cause pending
in said Court between Louisiana
Watkins, M. L. Watkins, her hus-
band, and others, Complainants
and Franklin Pierce and others,
Defendants, the undersigned,
Wilbur J. Kilby, one of the Com-
missioners in Chancery of said
Court, respectfully reports to
Court as follows;

That on the 21st day of Octo-
ber 1895, after the papers in said
Cause had been placed in his
hands with the request that he
proceed to execute said decree,
Your Commissioner issued notice
to the parties to said Cause to the

1 effect that he would proceed on
2 the 8th. day of November 1895 at
3 his office in Suffolk, Virginia
4 to make the several inquiries re-
5 quired by said decree to be made
6 and reported to Court by one of the
7 Commissioners of said Court;

8 That sufficient and legal ser-
9 vice of said notice was duly ac-
10 cepted on the 25th. day of October 1895
11 by all of said parties except said
12 Franklin Pierce and T. G. Daughtrey
13 upon the former of whom the notice
14 was duly served by the sheriff of
15 Isle of Wight County and upon the
16 latter by the sheriff of Chatham
17 County, as will appear by the endor-
18 sations on the notices herewith returned;

19 That the proceedings before your
20 Commissioner were adjourned from
21 day to day from the 8th. day of
22 November 1895 until this 16th. day
23 of March 1896 when to enable
24 your Commissioner to reach a prop-
25 er conclusion as to the partition or
26 sale of the land in the bill in
27 said Cause mentioned, the dep-
28 ositions of William Walter Eley and
29 Elisha L. Ballard were taken with
30 reference to such partition or sale.

31 That from the evidence furnished
32 by said witnesses, whose examina-

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trous are herewith returned, Your Commissioner is unable to report.

1. That the real estate in the Bill in said suit mentioned cannot be conveniently divided in kind between the several parties entitled thereto.

2. That no one of the parties has expressed any desire or willingness to take the entire property and pay the other parties for their interests such sums of money as they may be entitled to receive for such interests.

3. That the interests of those who are entitled to said property, or its proceeds will be promoted by a sale of the entire property and the distribution of the proceeds of the sale according to the respective rights of those entitled thereto.

4. That the said property is worth, in the opinion of said witnesses, in fee-simple from \$700 to \$800. It is, however, assessed for taxation at \$1452.⁰⁰. A fair valuation is about \$1000.

Your Commissioner further reports that the fee-simple owners of said land are Louisiana Watkins wife of Mills L. Watkins, Franklin Pierce, Talbot H. Laughtrey and Wm.

1 C. Wyatt, Louisiana Watkins and
2 Franklin Pierce each own a one-third
3 interest and Talbot H. Daughtrey and
4 Wm C. Wyatt each a one-sixth interest.
5 William Pierce the father of Loui-
6 siana Watkins and Franklin Pierce
7 and the grand-father of Wm C. Wyatt
8 and Talbot H. Daughtrey died in Jan-
9 uary 1894 and his daughter, the wife
10 of Talbot G. Daughtrey, and the mother
11 of said Wm C. Wyatt and Talbot H.
12 Daughtrey died 22 day of November
13 1892. The said land descended
14 in the proportions mentioned above
15 from said William Pierce to said
16 Louisiana Watkins, Franklin Pierce
17 Talbot H. Daughtrey and Wm C. Wyatt.
18 Talbot G. Daughtrey is not entitled
19 to curtesy in any interest or
20 share in said land as his wife,
21 who was the daughter of said
22 William Pierce, died before the
23 latter and was never seized of
24 any interest therein.

25 Your Commissioner further
26 reports that the following un-
27 satisfied judgments are liens up-
28 on the interests of the persons nam-
29 ed in said real estate, to wit:

30 I

31 Liens on the interest of Louisiana
32 Watkins in said land:

1				
2	1. A judgment obtained in the			
3	Circuit Court of said County in			
4	October 1894 by Walter B. Ferguson			
5	and Edward A. Chisleet, partners			
6	trading as W. B. Ferguson & Co. a-			
7	gainst The Watkins Lumber Com-			
8	pany (a corporation) and Talbot G.			
9	Daughtrey and Louisiana Watkins			
10	partners trading as Daughtrey and			
11	Watkins, docketed in the office			
12	of the clerk of the County Court			
13	of said County 31 Octo. 1894 for-			701.25
14	Int. from 29 May 1894 to 20			
15	Feby. 1895. - 8m. 21 ds.			30.39
16	Costs of suit			9.00
17				740.64
18	Paid 20 Feby. 1895 by The Watkins			
19	Lumber Company.	437.50		
20	less the costs retained by Sheriff	34.22	403.28	
21			337.36	
22	Int. from 20 Feby. 1895 to 13			
23	March 1895. - 21 days			1.79
24	Balance due			339.15
25	with interest from 13 March			
26	1895 till paid.			
27				
28	The balance of said judgment			
29	namely, the sum of \$339.15 with			
30	interest is payable to Talbot			
31	H. Daughtrey assignee of said			
32	W. B. Ferguson & Co.			

II

Liens on the interest of William C. Wyatt in said land:

First Liens.

All of the same date.

1. A judgment recovered in said Circuit Court 19 April 1892 and docketed in said office 10 May 1892 in favor of George M. Peters, Clinton G. Firestone and Oscar G. Peters, merchants and partners trading as the Columbus Buggy Company, against Wm C. Wyatt for -

Int. from 2 Jan. 1892 to 16 March 1896. - 4 y. 2 m. 14 ds.

Costs of suit

103 27

26 08

7 20

136 55

2. A judgment recovered in said Circuit Court 19 April 1892 and docketed in said office 10 May 1892 in favor of Chas. B. Smith and George Worthington, merchants and partners trading as Smith, Worthington & Co., against Wm C. Wyatt for the sum of -

\$126.36

Int. on \$63.¹⁸ from 5 Feby. 1892

to 16 March 1896. - 4 y. 1 m. 11 ds. 15.58

Int. on \$63.¹⁸ from 20 Feby. 1892 to 16 Mar. 1896. 15.32

Costs of suit

7.20 =

164 46

301 01

1				
2	brought on			301 01
3	3. A judgment recovered in			
4	said Circuit Court 19 April 1892			
5	and docketed in said office 10			
6	May 1892 in favor of A. A. O'Neil			
7	against Wm C. Wyatt for -	116 83		
8	Int. from 14 Dec. 1891 to 16			
9	March 1896; - 4 y. 3 m. 2 d.	29 83		
10	Costs of suit	7 20	153 86	
11	Total of first liens all of same date		454 87	

12	Second Liens.			
13	All of same date.			
14	1. A judgment recovered before			
15	Hon. Richard L. Brewer, Jr. Mayor of Suffolk,			
16	25 May 1892 and docketed in said of-			
17	fice 25 May 1892 in favor of W. W. Stodard			
18	and E. B. Emmons trading as Milan Cart			
19	Works against Wm C. Wyatt for -	32 00		
20	Int. from 16 May 1892 to 16 Mar. 1896.	7 36		
21	Costs of suit	1 25	40 61	

22	Third Liens.			
23	All of the same date.			
24	1. A judgment recovered before said			
25	Mayor 3 Octo. 1892 and docketed in said			
26	office the same day in favor of A. A. O'Neil	98 27		
27	Int. from 26 Sept. 1892 to 16 Mar. 1896.	20 47		
28	Costs of suit	1 25	119 99	
29			615 47	

brought on

61547

Fourth Liens

All of the same date.

1. A judgment recovered in said Circuit Court 19 Octo. 1892 and docketed in said office 5 Nov. 1892 in favor of the Bulett Carriage Company (a corporation) against Wm. C. Wyatt for - \$461.09

Int. on \$150. from 18 Nov.

1891 to 16 March 1896. \$39.00

Int. on \$258.²⁷ from 3

Dec. 1891 to 16 March 1896 \$66.00

Int. on \$52.⁸² from 14 Dec.

1891 to 16 March 1896 \$13.49 = 118.49

Costs of suit 7.20 586.78

2. A judgment recovered in said Circuit Court 19 Octo. 1892 and docketed in said office 5 Nov. 1892 in favor of M. Farlan Carriage Company against Wm. C. Wyatt for - \$102.50

Int. from 30 Jan. 1892 to

16 March 1896. 25.37

Costs of suit 7.20 135.07 721.85

Total liens against Wm. C. Wyatt \$1337.32

Your Commissioner has not been able to discover any other liens on said land or any other person's interest therein, nor has any matter been specially stated deemed pertinent by himself or required by any party to be stated or reported.

Respectfully submitted
this 16th day of March 1896,

Wilbur J. Kilby,
Commissioner in Chancery.

Fee of Court.	\$25.00
Shff. of Nausd. Co.	.50
" of Isle of Wight Co.	.50

In the Circuit Court of the
County of Chaussemond.

Watkins & als.

vs.

Piree & als. } In Chancery.

The depositions of William
Walter Eley and Elisha L. Bal-
lard taken before me, Wilbur J.
Kilby, a Commissioner in Chan-
cery of the Circuit Court of the
County of Chaussemond, Virginia,
on the 16th day of March 1896 to
be read in evidence in behalf
of the Complainants in a cer-
tain suit pending in the said
court between Louisiana Wat-
kins and others, Complainants
and Franklin Piree and
others, defendants:

Present no counsel for
either the Complainants or
defendants

William Walter Eley being
duly sworn, deposes and says
as follows:

1st. Q. What is your age, where
do you reside and what is your
occupation, and do you know

the parties to said suit:

Ans. I am 41 years of age reside in Suffolk, Va. am a merchant and know all the parties to said suit.

2. Q. Please state whether or not you are familiar with the real estate of which Wm. Pierce Sr. died seized and possessed consisting of three hundred and fifty acres of land, more or less, situated in Craven County and bounded by lands which formerly belonged to Wiley Knight, Thos. J. Kelly and others?

Ans. I was raised on a farm within ~~one~~ two miles of said land, and have known it all my lifetime.

3. Q. Please state whether said land can be conveniently divided in kind between the several parties entitled thereto, namely, Louisiana Watkins, Wm. C. Wyath, J. H. Daughtrey, and Franklin Pierce; and if the same cannot

be conveniently divided in kind whether any party will take the entire property and pay therefor to the other parties such sums of money as their interests therein may entitle them to; and if the same cannot be conveniently divided in kind and if no party will take the entire property and pay the others for their shares, whether the interests of those who are entitled to said property, or its proceeds will be promoted by a sale of the entire property or the allotment of part and sale of the residue and distribution of the proceeds of sale according to the respective rights of those entitled;

Ans: I do not think the land can be conveniently divided in kind between the parties. There are not more than 75 or 100 acres of the land cleared. The remainder is nearly all low, swampy, poor land of but little value for cultivation. It would, therefore, be dif-

difficult and inconvenient to divide the land in kind so as to give each party a parcel of such size and character, as to be fit for farming purposes. Each party's parcel of arable land would be too small ~~for~~ to justify cultivation of it with a view to making it produce an income or profit. The value of the land would be materially impaired by a partition in kind. Its condition is bad and the houses ^{are} dilapidated. It has been in the possession of tenants for a number of years.

I do not know whether any of the parties is willing to take the property and pay the others for their interests, but I am of opinion that no one of them is willing to do so. Some of them live there and have no use for it. They have not lived there for 20 years or more.

The parties are all in business in different parts of the country, Dr. Franklin Pierce lives in Isle of Wight County. So does Louisiana Wattins. Wm C. Wyatt is in business in Suffolk and J. H. Daugherty in Norfolk. The money ^{for} the interests or ~~these~~ the shares of these parties in the land would undoubtedly be of greater benefit to them, than their shares in kind. I therefore, am sure it would promote the interests of all of them to sell the land and distribute the proceeds among them according to their interests. The fee-simple value of the land is about \$700, or \$800.

And further this defendant says not.

Wm. Walter Esq.

Elisha L. Ballard being duly sworn, deposes and says as follows:

1. Q. What is your age, where do you reside and what is your occupation and do you know the parties to said suit?

Ans. I am 59 years of age, reside in Chaussemond County and am a farmer. I know all the parties to said suit - have known them all their lifetime.

2. Q. Please state whether or not you are familiar with the real estate of which Wm. Pierce Jr. died seized and possessed consisting of 350 acres of land more or less in Chaussemond Co., bounded by the lands which formerly belonged to Wiley Knight, Thos. J. Kilby and others?

Ans. I have known the said land all my lifetime and am perfectly familiar with it. I live within two miles of it.

3. Q. Please state whether said

land can be conveniently divided in kind between the several parties entitled thereto, namely, Louisiana Watkins, Wm. C. Wyatt, T. H. Daughtry and Franklin Pierce; and if the same cannot be conveniently divided in kind whether any party will take the entire property and pay therefor to the other parties such sums of money as their interests therein may entitle them to; and if the same cannot be conveniently divided in kind and if no party will take the entire property and pay the others for their shares, whether the interests of those who are entitled to said property, or its proceeds will be promoted by a sale of the entire property, or the allotment of part and sale of the residue and distribution of the proceeds of sale according to the respective rights of those entitled.

Ans. I think the land cannot be conveniently divided in kind. If divided in kind

one-third would go to Louisiana
Watkins, one-third to Franklin
Pierce, one-sixth to Wm C. Myatt
and one-sixth to J. H. Daughtrey.
To divide the land in this man-
ner would be to destroy its val-
ue for farming purposes and
give each party a share too
small to be of any profit to
such party. The land is fit
only for farming purposes, - that
is to say, that part of it which
is cleared consisting of 75 or 100 acres
is fit for such purposes. The
remainder consists of poor
or low-land not fit for cul-
tivation. If it were divided
in kind it would be in-
convenient to give each party
an equal quantity of the
same kind ^{of land} of equal value
and so located as to ~~be~~ ^{be}
accessible from the County road
road except through the lands
of others or ^{some of the parties} ~~each party~~. Each
party in such case would have
a small parcel of arable land

and a small parcel of low-land, - the whole being productive of but little profit or income. It could only be divided in kind to great disadvantage and loss to the parties. It has been very indifferently cultivated for many years and is in bad condition, - the houses being badly in need of repairs. It would cost a good deal to put it such ordinary condition as a farm should be. The owners have not lived there for many years. They are all of mature years and settled elsewhere.

I do not know of any of the parties willing to take the land or any part of it and pay the others such sums of money for their interests as such interests may be worth. I think, however, none of them is willing to do this.

* Franklin Pierce one of the parties is a doctor settled

in Isle of Wight county and
practising his profession there,
Wm C. Wyatt, another party is
in business in Suffolk, J. W.
Daughtry, another party, is in
business in Norfolk, Va. and
Louisa Watkins is the
wife of Mills L. Watkins &
lives in Isle of Wight county.

In view of all this, I am
sure the interests of all parties
will be promoted by a sale
of the entire land and dis-
tribution of the proceeds of the
sale among them according
to their respective rights.

The fee-simple value of
the land is about \$700, or \$800,
and further this defendant
says not.

Elisha L. Ballard

Virginia:

County of Chancery, to wit:

J. Wilbur J. Kilby, a Com-
missioner in Chancery of the Circuit
Court for the county aforesaid, do hereby

certify that the foregoing depositions of Wm Walter Eley and Elisha L. Ballard were duly taken, sworn to, and subscribed before me at the time mentioned therein and in the caption thereto for the purpose stated.

Given under my hand this 16th day of March 1896.

Wilbur J. Kilby,
Cour. in Chancery.

To Louisiana Watkins and M. L.
Watkins, her husband, W. C. Wyatt
and J. H. Daughtrey, Complainants

and

Franklin Pierce and J. G.
Daughtrey, Defendants.

You are hereby notified that on the 8th day of November, 1895
at my office, in Suffolk, Va., (at which time and place you are required to attend), I shall ~~proceed~~
~~to make the several inquiries required to be made by the~~ ^{take, state and}
~~settle the following accounts which are to be taken, stated and settled and reported to Court in pursuance of the~~
decree of the Circuit Court of Hansemond County, Va., rendered the 15th
day of October 1895 in the suit in chancery pending in said Court to which you
are parties plaintiff and defendant, to wit:

1. Whether the real estate in the Bill in said suit men-
tioned can be conveniently divided in kind between
the several parties entitled thereto.
2. If the same cannot be conveniently divided in kind,
whether any party will take the entire property and pay
therefor to the other parties such sums of money as their in-
terests therein may entitle them to.
3. And, if the same cannot be conveniently divided in kind
and if no party will take the entire property and pay the
others for their shares, whether the interests of those who are
entitled to said property or its proceeds will be promoted
by a sale of the entire property, or by allotment of part
and sale of the residue.
4. The fee-simple value of said real estate and the
several interests of the respective owners thereof.
5. The amount of any liens, if any, upon said real
estate, or upon the interest of any of the parties en-
titled thereto and their several priorities.
6. Any matter specially stated deemed per-
tinent by myself, or required by any party
to be so stated.

Given under my hand, as Commissioner in Chancery of said Court, this 21st day of
October 1895

WILBUR J. KILBY,
Commissioner in Chancery.

sufficient and legal service of this
notice is hereby accepted by me this 25th,
day of October 1895.

J. H. Daughtrey

Copy for
J. H. Daughtrey,
Dumfries, Scotland.
Jan. 8th 1895
J. H. Daughtrey

To Louisiana Watkins and M. L.
Watkins, her husband, W. C. Wyatt and
J. H. Daughtrey, Complainants

and

Franklin Pierce and J. G. Daugh-
trey, Defendants

You are hereby notified that on the 8th, day of November, 1895, at my office, in Suffolk, Va., (at which time and place you are required to attend), I shall ~~take, state and settle the following accounts which are to be taken, stated and settled and reported to Court in pursuance of the~~ proceed to make the several inquiries required to be made by the decree of the Circuit Court of Hansemond County, Va., rendered the 15th, day of October, 1895 in the suit in chancery pending in said Court to which you are parties plaintiffS and defendantS, to wit:

1. Whether the real estate in the Bill in said suit mentioned can be conveniently divided in kind between the several parties entitled thereto.
2. If the same cannot be conveniently divided in kind, whether any party will take the entire property and pay therefor to the other parties such sums of money as their interests therein may entitle them to.
3. And, if the same cannot be conveniently divided in kind and if no party will take the entire property and pay the others for their shares, whether the interests of those who are entitled to said property or its proceeds will be promoted by a sale of the entire property or by the allotment of part and sale of the residue.
4. The fee-simple value of said real estate and the several interests of the respective owners thereof.
5. The amount of any liens, if any, upon said real estate, or upon the interest of any, of the parties entitled thereto and their several priorities.
6. Any matter specially stated deemed pertinent by myself or required by any party to be so stated.

Given under my hand, as Commissioner in Chancery of said Court, this 21st, day of October, 1895

WILBUR J. KILBY,
Commissioner in Chancery.

Sufficient and legal service of
this notice is hereby accepted by us this
25th. day of October 1895.

W. L. Wyatt
M. L. Watkins.
Louisiana Watkins.

I have served this notice upon the within-named
Franklin Pierce by delivering a copy hereof in writ-
ing to him in person in my county this 4th. day of
November 1895

Ro A Edwards Esq.
of DeLoof Co. vs

I have served this notice upon the within-named
P. G. Daughtrey by delivering a copy hereof in writ-
ing to him in person in my county this 4th. day
of November 1895

A. H. B. Jones
Sheriff

Watkins & al.

vs. } In Chy.

Pierce & al.

Report under
decree of 15 Octo.
1895.

1896 April 2nd filed
H. G. Gomer Clerk

AUCTION SALE

OF A

VALUABLE FARM

In Nansemond County.

By authority of a decree of the Circuit Court of Nansemond county entered on the 14th day of April, 1896, in the chancery cause of Louisiana Watkins and others vs. Franklin Pierce and others, pending in said court, we shall proceed to sell by public auction, before the Court-house door in said county, at Suffolk,

On Monday, June 8, 1896,

(court day), at 12 o'clock M., the following real estate, to wit: All that certain tract of land in Nansemond county, Virginia, containing three hundred and fifty acres, more or less, adjoining the lands of Junius Winborne (formerly Wiley Knight), the lands formerly belonging to Ben. Bains' estate, B. Walden and others, and being same land of which William Pierce, Sr., died siezed and possessed.

TERMS—One-half in cash, and the balance on a credit of six months, the deferred payment to bear interest from the day of sale, and to be evidenced by bond, and the title to be retained until the further order of the Court.

There is said to be considerable pine timber on this farm.

**W. C. WYATT,
E. E. HOLLAND,
Special Commissioners.**

I, Azra P. Gomer, Clerk of the Circuit Court of Nansemond county, Virginia, do certify that the bond required of W. C. Wyatt and E. E. Holland as special commissioners under the decree of said Court made on the 14th day of April, 1896, in the chancery cause pending in said court between Louisiana Watkins and others, complainants, and Franklin Pierce and others, defendants, has been executed with security deemed sufficient by me.
Given under my hand this 27th day of May, 1896. **A. P. GOMER, CLERK.**

AUCTION SALE

OF A

VALUABLE FARM

In Nansemond County.

By authority of a decree of the Circuit Court of Nansemond county entered on the 14th day of April, 1896, in the chancery cause of Louisiana Watkins and others vs. Franklin Pierce and others, pending in said court, we shall proceed to sell by public auction, before the Court-house door in said county, at Suffolk,

On Monday, June 8, 1896,

(court day), at 12 o'clock M., the following real estate, to wit: All that certain tract of land in Nansemond county, Virginia, containing three hundred and fifty acres, more or less, adjoining the lands of Junius Winborne (formerly Wiley Knight), the lands formerly belonging to Ben. Bains' estate, B. Walden and others, and being same land of which William Pierce, Sr., died siezed and possessed.

TERMS—One-half in cash, and the balance on a credit of six months, the deferred payment to bear interest from the day of sale, and to be evidenced by bond, and the title to be retained until the further order of the Court.

There is said to be considerable pine timber on this farm.

W. C. WYATT,
E. E. HOLLAND,
Special Commissioners.

I, Azra P. Gomer, Clerk of the Circuit Court of Nansemond county, Virginia, do certify that the bond required of W. C. Wyatt and E. E. Holland as special commissioners under the decree of said Court made on the 14th day of April, 1896, in the chancery cause pending in said court between Louisiana Watkins and others, complainants, and Franklin Pierce and others, defendants, has been executed with security deemed sufficient by me.

Given under my hand this 27th day of May, 1896.

A. P. GOMER, CLERK.

Louisana Watkins et als

VS

Franklin Pierce et als

This cause came on this day to be again heard on the papers formerly read as well as on the second report of Wilbur J. Kilby one of the commissioners of this court to whom it had been referred, which said report was filed on the 2nd day of April 1897, and to which said report no exception has been filed and was argued by counsel.

On consideration whereof the court doth confirm the said report and doth order adjudge and decree that the special commissioners W. C. Wyatt and E. E. Holland shall out of the proceeds in their hands arising from the sale of the real estate in the bill mentioned, first pay all the cost and expenses of this ~~of this~~ suit and sale, and that they shall then pay out and distribute the remainder of the said money as follows;

First they shall pay all the debts found to be due by the estate of the late William Pierce and reported by W. J. Kilby the said commissioner including the debt of \$200 due to Louisiana Watkins. The remainder they shall divide and pay out to the heirs at law of the said William Pierce deceased according to their respective interest^s in the said estate; but before paying anything ~~to~~ ^{the} to administrator of the late M. Kittie Pierce deceased or to her heirs at law, out of the amount due to her estate they shall first pay out the following debts with priority as herein stated to-wit;

First to John King the sum of ~~the~~ \$30 with interest due on the same.

Secondly to Ballard & Smith the sum of \$4;03 and to Louisiana Watkins the sum of \$100.

And out of the amount due and payable to W. C. Wyatt as his share of said estate the said commissioners shall pay first to the creditors of the said W. C. Wyatt the amounts due them as shown by the report of ~~of~~ the said commissioner W. J. Kilby

with priority as stated in his said report, if there be funds
~~funds~~ sufficient for that purpose.

And it ~~appears~~ appearing that there is a lien on all the money
coming to the said Louisiana Watkins from said estate ^{on under this decree or in this proceeding} it

is ordered that ~~out~~ of the money payable to the said Louisiana Watkins the said commissioners shall first pay to R. H. Rawles an attorney's fee of \$ 25, for his services in prosecuting her petition filed in this cause . ; and out of the remainder they shall pay to T. H. Daughtrey the amount of the judgment assigned to him by W. B. Ferguson & Co., or such part thereof as may now be due as shown by the report of the said commissioner W. J. Kilby ; and the balance if any they shall pay to the said Louisans Watkins or her attorney. The said commissioners shall make report to court of all their disbursements under this decree accompanied with proper vouchers : and this cause is continued.

Questions for Men Who Were Prevented from Voting.

..... a witness of lawful age,
introduced by contestant, being first duly sworn and cautioned, testified as follows:

1st Question. State your name, age, residence and occupation.

Answer

2d Question. State whether you were a registered voter at
Precinct, in County or City, November 3d, 1896.

Answer

3d Question. Did you vote for Congressman from the Second Congressional District
of Virginia at the election held in said District November 3d, 1896?

Answer

4th Question. If you did not vote, state fully and particularly what effort you made
to do so, and how you were prevented from doing so?

Answer

5th Question. If you had voted, for whom would you have voted for Congressman
from Second Congressional District of Virginia at said election?

Answer

Decree for
Distribution.

To be entered.
April 1897.

Enter April 21, 1897
Robert R. Dennis

We consent to this
deed.

R. H. Hawks atty
for Louisiana Wat-
kins
Entered in
chancery
on 3 Page 86

In the Circuit Court of Nansemond County:

Watkins and others

vs-In Chancery

Pierce and others-

This cause came on this day to be again heard upon the papers formerly read, and upon the report of W.C. Wyatt and E.E. Holland, Special Commissioners, filed on the 1st day of October, 1896, to which report there is no exception, and upon the petition of M.L. Watkins, Agent for Louisiana Watkins, this day filed, and was argued by counsel: On consideration whereof the court doth ratify, approve and confirm said report and said sale, and doth order, adjudge and decree that upon the payment of the balance of the purchase price with interest, the said Special Commissioners E.E. Holland and W.C. Wyatt, who are hereby appointed for that purpose, shall convey by good and sufficient deed, with special warranty, unto said T.H. Daughtrey, the purchaser thereof, the lands in the bill and proceedings mentioned.

And it appearing from the report of said Special Commissioners that there is now deposited in the Farmers Bank of Nansemond to the credit of the said commissioners in this suit, the sum of \$475.00, the cash instalment of the purchase price, the court doth further adjudge, order and decree that the said Special Commissioners shall ^{withdraw from the funds and} collect the said certificate of deposit returned with their report, and after paying the costs of this suit and the expenses of sale, and a fee of \$50. — to the counsel prosecuting this suit, shall take a new certificate of deposit for the amount then in their hands and file the same in these papers subject to the future order of this court.

And the court doth further order, adjudge and decree that A.H. Baker, Sheriff of Nansemond County and as such Administrator of William Pierce, Sr and M. Kittie Pierce, deceased, be summoned to answer said petition of said M.L. Watkins, Agent, this day filed, and that these ^{in this suit} papers be referred to one of the commissioners of this court who is directed to enquire ^{into} and report to the court:

1st. An account of the debts due by the said William Pierce, Sr, or his estate, with their respective dignities and priorities.

- 2nd. An account of the debts due and owing by the said M. Kittie Pierce, or
3rd her estate, with their respective dignities and priorities.
An account of the transactions of A. H. Baker Sheriff and administrator as aforesaid
Which said several inquiries the said commissioner shall make and to the
court report together with any matter specially stated deemed pertinent
by himself or required by any party to be so stated.

And this case is continued.

Watkins & others
W-Dereel
Percel & others)

Dec 20, 1896

To be entered

Robert A. Dentis

Entered in

Chancery

DR 3 Page 58

In the Circuit Court of Nansemond County:

Lerisona Watkins, *et al*
vs
Franklin Pierce, *et al*

This cause came on again this day to be again heard upon the papers formerly read, and upon the report of Wilbur J. Kilby, Commissioner in Chancery, filed herein on the 2nd day of *April* 1896, to which report no exceptions have been filed and was argued by Counsel: on consideration whereof the Court doth approve and confirm said report, and doth order *and E. E. Holland* judge and decree that W. C. Wyatt, who *is* hereby appointed ~~x~~ Special Commissioners for that purpose, do proceed, after having advertised the time, place and terms of sale in some newspaper published in the Town of Suffolk, Virginia, for two successive weeks and by posted hand-bills, to sell the real estate in the bill and proceedings mentioned, at public auction, in front of the court-house of the county of Nansemond, on some court-day, upon the following terms, to wit: One half cash and the balance on a credit of six months, the credit instalment to bear interest from date of sale; taking from the purchaser a bond for the deferred payment, and the title to be retained until the further order of the Court. And the said Commissioners *are* ~~is~~ directed to report *their* proceedings hereunder and under any other decree entered herein to Court. But the said Commissioners shall receive no money hereunder, nor advertise said land for sale, until *they* shall enter into bond with sufficient security in the clerk's office of this court, payable to the Commonwealth of Virginia, in the penalty of \$ *2000* ~~x~~ and conditioned for the faithful discharge of *their* duties under this or any any other decree entered in this cause. And this cause is continued.

IN THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT OF COLUMBIA

Walter
Deere & Co
Perce

Apr 14/1896

To be entered

Robert H. Davis

Chancery
Page 10

In the Circuit Court of Nansemond County:

Watkins and others vs Pierce and others-

This cause came on this day to be heard upon the bill taken for confessed as to the adult defendants, on whom process has been duly served, they still failing to appear and plead, answer or to demur to said bill, and was argued by counsel: On consideration whereof the court doth order adjudge and decree that the papers in this cause be referred to one of the commissioners of this court, who is directed to enquire into and report to Court-

1st. Whether the real estate in the bill mentioned can be conveniently divided in kind between the several parties entitled thereto.

2nd. If the same cannot be conveniently divided in kind whether any party will take the entire property and pay therefor to the other parties such sums of money as their interests therein may entitle them to.

3rd. And, if the same cannot be conveniently divided in kind and if no party will take the entire property and pay the others for their shares whether the interests of those who are entitled to said property or its proceeds will be promoted by a sale of the entire property or by the allotment of part and sale of the residue.

4th. The fee-simple value of the real estate in the bill and proceedings mentioned of which William Pierce, Sr, died seized and possessed, *and the several interests of the respective owners thereof.*

5th. The amount of any liens, if any, upon said real estate, or upon the interest of any of the parties entitled thereto, and their several priorities.

Which several inquiries the said commissioner shall make and to the court report together with any matter specially stated deemed pertinent by himself or required by any party to be so stated.

Watkins & others
vs De Cree
Pierce and

Oct. 15, 1895

To be entered
Robert R. Reutis.

Entered in Chancery
Order Book No. 2
Page 660.

WINDSOR MILLS==JOHN KING, Prop'r,

CLEANER, GRADER, SHELLER
AND WHOLESALE DEALER IN

BRANDS

JUMBO,
NO. 1,
WHITE HORSE,



PICNIC.

>Virginia*Peanuts<

ALL QUOTATIONS
SUBJECT TO CHANGES
OF THE MARKET.

WINDSOR, VA., July 26 1897

Judge W. J. Kirby

Jefferson W.

Dear Sir

In reply to your letter, I
see you are opposed to the
Kirkland & Co. - I have seen this claim
to Messrs C. C. Howard & W. C. Wyant & have
and thought it had been turned over
to you - I have not had this claim
before, but Dr. Freeman Pease, brother of
the deceased will be present during this term
of Court and he will assist its construction

Yours very truly
John King

John King
1897

The Commonwealth of Virginia,

To the Sheriff of the County of Harrison Greeting:

WHEREAS, on the 28th day of October 1896, a writ of fieri facias was sued out of the Clerk's Office of the Circuit Court of the County of Isle of Wight - by John King

to the Sheriff of the County of Isle of Wight directed returnable to the first Monday in December, 1896, in favor of the said John King against Lorisana Watkins

for \$1700.00, with legal interest thereon from the 29th day of January 1896, till paid, and \$10.91 costs; and a suggestion in writing having been filed in the Clerk's Office afore-said, by the said John King, that by reason of the lien of his said writ of fieri facias there is a liability on C. E. Holland Commissioner

Therefore, we command you that you summon the said Lorisana Watkins and C. E. Holland Commissioner to appear before the Judge of our Circuit Court of the County of Isle of Wight - at the court-house thereof, on the first day of the next regular term of our said Court (being the 20th day of April 1897 - next), to answer the said suggestion. And have then there this writ.

WITNESS, N. F. Young Clerk of our said Court, at the court-house, the 30th day of October 1896, and in the 12th year of the Commonwealth.

Copy to N. F. Young Clerk.
N. F. Young

v.s

}

GARNISHEE
SUMMONS.

p. q.

To

Term,

Court.

Estate of William Pierce Sr. Decd.
1895- In acc. with M. L. Watkins ayt. 
acc. 29 To board, clothing, washing
and services taking care of
Wm Pierce Decd. from November
1890 to Feby. 1894 . \$600.00
By cash from Dr Pierce 25.00
\$575.00

Exhibit G.

11 Exch 29

Commonwealth of Virginia
County of Isle of Wight

I J B Wilson a Justice of the Peace
for the County aforesaid in the State
of Virginia do certify that M L Watkins
agt whose name is signed to the within writing
bearing date on the 29th day of Dec 1845 has
acknowledged the same to be correct before
me in my County aforesaid given under
my hand this 5th day of Oct in the year 1846
J B Wilson J P.

Estate of Mr. Purce Sr. Dec 5th 1891

1882 In acc. with M L Watkins agt.

Jan To paid Geo. W. Sturmy
on mule for Mr. Craig
with which to haul wood 32.00

" " " furnished Mr. Lufsey
mule while hauling wood 15.00

" " " furnished Henry Purce
mule while cutting wood 9.00

1884 " cash & mule furnished
Miss Kittie Purce

1895 up to Mr. Purce's death 44.85 \$100.85

Dec 29 To Int. on above

77.76
\$178.61

Exhibit H.

H
11

Commonwealth of Virginia
County of Isle of Wight
I J. B. Wilson a Justice of the peace for
the county aforesaid in the state of
Virginia do certify that M. L. Watkins
agent whose name is signed to the within
writing bearing date Dec 29-1895
has acknowledged the same to be correct
before me in my county aforesaid
Given under my hand this fifth day
of October in the year 1896
J. B. Wilson J.P.

Miss Kittie Pierce Dr.
1895- In acc. with M. L. Watkins a/c.
Sept. To board, nursing &c
from death of W. Pierce Sr.
to her death

\$ 100.00

Exhibit J.

93 Wood Street
N.Y.

811

Commonwealth of Virginia
County of Isle of Wight

I J B Wilson a Justice of the peace
for the county aforesaid in the state
of Virginia do certify that M. L.
Watkins agent whose name is signed
to the within writing bearing date
of September 1846 has acknowledged
the same to be correct before me in
my county aforesaid Given under
my hand this fifth day of Oct 1846
J B Wilson J.P.

Louisa Watkins et al.

vs
Franklin Pierce et al.

To the Honorable R. R. Prentiss
Judge of the Circuit Court of
Haukebund County:—

Your Petitioner M.
L. Watkins agent respectfully
represents to the Court that
certain proceedings have been
had in the Chancery Cause of
Louisa Watkins and others
vs Franklin Pierce and others
now pending in the said Court
whereby the real estate of the
late William Pierce & now sold
for partition among three
entitled heirs, and your
petitioner is informed that
the purchase money for the
same is now in the hands
of the special Commissioners
appointed in said Cause and
is ready for distribution.
Now your petitioner says that
the said estate, or the late
William Pierce & now sold is
inclosed to him in the same

X that A. H. Baker, Sheriff of Lawrence County and ex-
and ~~Commissioner~~ Administrator of the estates of William Pierce and
Mr. Kittie Pierce may be ordered pay dependent heirs and
sums to them the same, and

of \$575- for board, clothing, washing
& services for set forth in
an account herewith filed &
marked Exhibit "G" and is
further indebted to him in
the sum of \$178⁶⁴/₁₀₀ or set forth
in another account herewith filed
marked Exhibit "H" both of
which exhibits are proposed to be
taken on a part of this petition
and your petitioner further says
that the late Kittie Pierce who
had an interest in said estate
of the said William Pierce Sr.
is also indebted to him in
the sum of \$100. or appears
from an account herewith
filed marked Exhibit "I" and
proposed to be taken on a part
of this petition. Now your
petitioner prays that before the
purchase money for the land
of the said William Pierce is
disbursed and paid out to those
who claim to be entitled to
receive the same, that these sums
due your petitioner may be paid
to him; and that before the

show of the said Little Piece
on her said father's estate
as paid to her heirs at law
that the said amount of \$100
due by her to this petitioner may
be paid to him; that if the
said claims or any of them
are controverted or denied he
may have an opportunity to
prove them by competent wit-
nesses; that all necessary and
proper accounts of the said
claims may be taken before
one of the Commissioners of this
court to whom he prays that
this case may be referred
and that the said special
Commissioners in said Case
may be ordered to hold the
said purchase money in said
land until there claims of
your petitioner can be es-
tablished into and admitted by
this court, and for all such
other justice and general
relief as this case may re-
quire as to Equity may
seem meet a your pe-
titioner wishes ever to be.

M. L. Watkins Agent
By Deed.

Virginia: - Wasserman Deed Trial: - I
R. H. Maule, a Notary Public for the County &
State of Virginia certify that M. L. Watkins sent
the petition in the above petition for this day
afforded before me in my said County & made out
the facts set forth in said petition for
true and correct. Given under my hand this
5th day of October, 1896. R. H. Maule N. P.

Petition of

M. L. Watkins age

In the Circuit Court of Nansemond County-

Louisana Watkins and others vs Franklin Pierce and others.

This cause came on this day to be again heard upon the papers formerly read, and upon the report of distribution made by ~~the~~ Special Commissioners W.C. Wyatt and E.E. Holland, filed on October 1st, 1897, to which report there is no exception, and was argued by counsel:-On consideration whereof the court doth ratify, approve and confirm said report of distribution of the proceeds of land sold in these proceedings in all respects, and it appearing that there is nothing further to dispose of in this suit doth adjudge, order and decree that the same be removed from the docket.

Watkinsals
W. J. F. Deane
Pierceroals

Oct 14, 1897

To be entered

Robert D. Huntis.

Entered in

Chy O. B. 3 Page 1051

To the Hon:R.R.Prentis,Judge of the Circuit Court for the County of Nansemond:

Your complainants,ⁱLousiana Watkins, and M.L.Watkins,her husband,W.C.Wyatt and T.H.Daughtrey,respectfully show the following case:

That some time in the year 189⁴,William Pierce,Sr,departed this life ,intestate,leaving as his only heirs at law,your complainants,ⁱLousiana Watkins,the wife of M.L.Watkins,W.C.Wyatt,T.H.Daughtrey, and Franklin Pierce, and M.K.Pierce.That since his death the said M.Kittie Pierce,has also departed this life,intestate,leaving your complainants as aforesaid and the said Franklin Pierce as her only heirs at law:That the said ⁱLousiana Watkins and the said Franklin Pierce are children of the said William Pierce Sr, and the said W.C.Wyatt and T.H.Daughtrey,are the children of Garaphelia^a Daughtrey,who first married a Wyatt and,after his death,T.G.Daughtrey,and who was a daughter of said William Pierce,Sr.That the said Garaphelia Daughtrey departed this life before her father,the said William Pierce,leaving the said W.C.Wyatt and T.H.Daughtrey,as her only children and heirs at law.That at the time of ^{the} ^{of said William Pierce Sr,} death the records in the Clerks Office of Nansemond County Court showed that he had some time in the year 18- conveyed to T.G.Daughtrey,M.L.Watkins and Franklin Pierce a certain tract of land in Nansemond County,Virginia,containing three hundred and fifty acres,more or less,and adjoining the lands of Wiley Knight Thos.J.Kilby and others by absolute deed of bargain and sale.That the grantees in said deed admitted that the said deed of bargain and sale , though absolute on its face,was in fact intened^d to secure a certain indebtedness,and that the indebtedness having been paid,the property in reality belonged to the estate of said William Pierce,Sr.That subsequently by a final decree entered in a chancery suit pending in the Circuit Court of Nansemond County in which the said M.K.Pierce,W.C.Wyatt and T.H.Daughtrey were the plaintiffs and the said T.G.Daughtrey,Franklin Pierce,M.L. Watkins and ⁱLousiana Watkins were defendats,at the April term,1895,of said Court,the said deed was declared null and void,and the title to said ^{above described} lands ascertained to be vested in the heirs at law of said William Pierce Sr.

And your complainants further state, that the said real estate is, as they believe, susceptible of partition among the parties entitled thereto; but, if it be not, then ~~then~~ your complainants pray that the same may be sold, and the proceeds of sale divided among the parties, according to their respective rights. Should the property not be divisible in kind, your complainants believe and here state, that the interests of those who are entitled to said real estate, or its proceeds, will be promoted by a sale of the whole of said real estate, or by an allotment of part and sale of the residue.

In tender consideration whereof, and for as much as your complainants are remediless in the premises save in a court of equity, where matters of this kind are alone and properly cognizable, your complainants pray that the said Franklin Pierce, ^{and J. G. Daugherty} may be made a party defendant to this bill, and required to answer the same (answer under oath being waived); that proper process issue; that the said real estate be divided among the several parties entitled thereto, and your complainants portions thereof allotted to them, and in case the said real estate cannot be ~~sold~~ partitioned and divided in kind, that the same may be exposed to sale, and the proceeds of such sale divided among the parties entitled thereto; that proper and reasonable counsel fees be allowed; and that all such other, further and general relief may be afforded your complainants as the nature of their case may require, or to equity shall seem meet. And your complainant will ever pray, &c.

Louisa Watkins
W. D. Watkins
W. C. Wyatt
J. H. Daugherty
By E. E. Hall and
their atty

Watkins & also
to Brie
Perce & also

Louisa Watkins and others
Against } In Chancery
Franklin Pierce and others.
Chancery Notes,

1895 Sept. 5th. Process issued returnable Sept
Rules Third Monday.

" " 16th. Process returned executed on
defendants.

Bill filed and decree nisi
against them.

" Oct 7th. Decree nisi confirmed and cause
set for hearing

Chancery
Notes.
