

1902-003

Nansemond Co (Suffolk)

Chancery Causes: H. Symes Johnson vs Sue Pope Johnson

Pope, Saunders, Delk, Uzzell, Underwood, Pruden

Costs

Clerk 3.69

Day 1.50

Auty 15.00

~~\$~~ 20.19

VIRGINIA- In the Circuit Court of Nansemond County, to-wit: In Vacation,
on the /34 day of February, 1902.

H. Symes Johnson.....Plaintiff,

Against. In Chancery.

Sue Pope Johnson.....Defendant.

The object of this suit is to ask for a decree of divorce a vinculo
matrimonii for the plaintiff from the defendants. And affidavit having
been made and filed that due diligence has been used by H. Symes

Johnson, the plaintiff, to ascertain the whereabouts, and in what
or resides and that the said defendant Sue Pope Johnson is
county or corporation the defendant, Sue Pope Johnson, is not a resident

of this state, it is ordered that she appear, within fifteen days

after due publication of this notice, in the Clerk's Office of our

said Court and do what may be necessary to protect her interest. And

it is ordered that a copy of this order be published in the Suffolk Her-
ald(a newspaper published in the town of Suffolk, Virginia) once a

week for four successive weeks, and that another copy thereof be posted

at the front door of the Courthouse of this county on the first day

of the next County Court of this county.

Teste: *A. P. Gomez* Clerk

J. B. Brown, J. G.

I, S. E. Everett, hereby make affidavit that due diligente has been used by H. Symes Johnson to ascertain the whereabouts, and in what county or corporation the defendant, Sue Pope Johnson is or resides without effect, and that the said defendant, Sue Pope Johnson, is not a resident of this State.

Given under my hand this 13th day of February, 1902.

S. E. Everett

Subscribed to and sworn to before me this 13th day of February, 1902.

~~Clerk of the Court~~

A. P. Gomer Clerk

To A. P. Gomer, Clerk of the Circuit Court of Hansemond county, Va.

H. Symes Johnson,

Complainant,

Against: In Chancery.

Sue Pope Johnson,

Defendant.

Issue summons in chancery to Third Monday Rules in February, 1902.

Tax \$1.50

Pay \$1.50

S. E. Gomer P.Q.

OFFICE OF THE HEARLD.

Suffolk, Va., April 10, 1902.

Publication

I hereby certify that the order of which the annexed is a copy has been published in THE SUFFOLK HEARLD in the manner prescribed by law—once a week for four successive weeks.

J. M. Brimmer, Editor
The Suffolk Herald

New Advertisements.

VIRGINIA—IN THE CIRCUIT COURT
of Nansemond county, to wit—in va-
cation—on the 13th day of February 1902:
H. Symes Johnson.....Plaintiff,
AGAINST
Sue Pope Johnson.....Defendant.

IN CHANCERY.

The object of this suit is to ask for a de-
gree of divorce *a vinculo matrimonii* for
the plaintiff from the defendant. And af-
fidavit having been made and filed that
due diligence has been used by H. Symes
Johnson, the plaintiff, to ascertain the
whereabouts, and in what county or cor-
poration the defendant, Sue Pope John-
son, is or resides, and that the said defend-
ant, Sue Pope Johnson, is not a resident
of this State it is ordered that she appear,
within fifteen days after due publication
of this notice, in the Clerk's office of our
said court and do what may be necessary
to protect her interest. And it is ordered
that a copy of this order be published in
the SUFFOLK HERALD (a newspaper pub-
lished in the town of Suffolk, Va.) once a
week for four successive weeks, and that
another copy thereof be posted at the
front door of the Courthouse of this county
on the first day of the next County Court
of this county.

A copy—Teste:

A. P. GOMER, Clerk
S. E. EVERETT, p. q. fel4-4t

I, A. P. Gomer, clerk of the Circuit Court of Nansemond County, do hereby certify that the above order of publication was posted at the front door of the Court house of Nansemond County on Monday, the 10th. day of March, 1902, it being the first day of the march term of the said Nansemond County Court.

A. P. Gomer, Clerk

Circuit Court.

Tuesday after the Second Monday in
April and October.

HON. ROBERT R. PRENTIS, Judge.
AZRA P. GOMER, Clerk.

County Court.

Second Monday in each month.

HON. WILBUR J. KILBY, Judge.
ROBERT R. SMITH, Clerk.
E. E. HOLLAND, Commonwealth's Attorney.
ALEX. H. BAKER, Sheriff.
SYDNEY T. ELLIS, County Treasurer.
JOHN B. PINNER, Commissioner of Accounts.

Nansemond County Clerks' Office.

Suffolk, Va., 190

VIRGINIA--IN THE CIRCUIT COURT
of Nansemond county, to wit--in va-
cation--on the 13th day of February 1902:

H. Symes Johnson..... Plaintiff,
AGAINST

Sue Pope Johnson..... Defendant.

IN CHANCERY.

The object of this suit is to ask for a de-
gree of divorce *a vinculo matrimonii* for
the plaintiff from the defendant. And af-
fidavit having been made and filed that
due diligence has been used by H. Symes
Johnson, the plaintiff, to ascertain the
whereabouts, and in what county or cor-
poration the defendant, Sue Pope John-
son, is or resides, and that the said defend-
ant, Sue Pope Johnson, is not a resident
of this State, it is ordered that she appear,
within fifteen days after due publication
of this notice, in the Clerk's office of our
said court and do what may be necessary
to protect her interest. And it is ordered
that a copy of this order be published in
the SUFFOLK HERALD (a newspaper pub-
lished in the town of Suffolk, Va.) once a
week for four successive weeks, and that
another copy thereof be posted at the
front door of the Courthouse of this county
on the first day of the next County Court
of this county.

A copy--Teste:

A. P. GOMER, Clerk.
S. E. EVERETT, p. q. fe14-4t

I A. P. Gomer Clerk of the Circuit Court of Nansemond
County do Certify that the above order of publication was
posted at the front door of Nansemond County Court
house on Monday the 10th day of March 1902, it-
being the first day of the March term of the County
Court of said County

Teste: A. P. Gomer Clerk

Order of Publication

CHANCERY SUMMONS.

The Commonwealth of Virginia,

TO THE SHERIFF OF NANSEMOND COUNTY—GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

Due Pope Johnson

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 *Third* Monday in *February 1902*, to answer

a Bill in Chancery, exhibited against *her*

in the said Court by

N Symes Johnson

and have then and there this summons.

Witness, A. P. GOMER, Clerk of our said Court, at his office, this *13th* day of

February 1902, in the *126th* year of the Commonwealth.

A copy—Teste:

A. P. Gomer, CLERK.

Teste:

A. P. Gomer, CLERK.

S E Everett p. q.

A copy for
Sue Pope Johnson
vs. } In Chancery.

1902

February Rules.

Third Monday.

Nansemond Circuit Court.

Process Book No. 21.

Page 220

CHANCERY SUMMONS.

The Commonwealth of Virginia,

TO THE SHERIFF OF NANSEMOND COUNTY—GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

*Sue Pope
Johnson*

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 *Third* Monday in *February 1902*, to answer

a Bill in Chancery exhibited against *her*

in the said Court by

N. Symes Johnson

and have then and there this summons.

Witness, A. P. GOMER, Clerk of our said Court, at his office, this *13th* day of

February 1902, in the 12 *6*th year of the Commonwealth.

A copy—Teste:

Teste:

CLERK.

CLERK.

S E Everett p. q.

N Symes Johnson

vs. } In Chancery.

Sue Pope Johnson

1902

February Rules.

Third Monday.

Nansemond Circuit Court.

Process Book No. *2*

Page *220*

Office of
Register of Deeds,
Gates County,
Lycurgus Hofter, Register.

Gatesville, N. C., APR 14 1902 190

Mr. S. E. Everett,
Suffolk, Va.

Dear Sir:

Your postal - without
date - addressed to W. T. Cross, Clerk
Superior Court, has been
referred to this office.

Herewith we have your
a certified copy of the Mar-
riage License, as requested.
The fees are \$1.25-

Yours truly
Lycurgus Hofter,
Reg. Deeds,

STATE OF NORTH CAROLINA,

Office REGISTER OF DEEDS.

Gates

COUNTY.

May 9 1898

To any Ordained Minister of any Religious Denomination, or any Justice of the Peace of said County:

I, ¹ Raymond Johnson having applied to me for a LICENSE for the marriage
of ² R. S. Johnson of ³ Haverland Co. Va
age ⁴ 22 years, color ⁵ White, the son of ⁶ S. H. Johnson
and ⁷ L. H. Johnson the father now ⁸ dead the mother ⁹
living resident of ¹⁰ Haverland Co. and ¹¹ Sue Pope
of ¹² Haverland Co. age ¹³ 21 years, color ¹⁴
White daughter of ¹⁵ J. N. R. Pope and ¹⁶ L. T. Pope
the father ¹⁷ living, the mother ¹⁸ living, resident of ¹⁹
Haverland Co.

*And the written consent of

the

of the said to the proposed marriage having been filed with me,
and there being no legal impediment to such marriage known to me, you are hereby authorized, at any
time within one year from the date hereof, to celebrate the proposed marriage at any place within the
said County.

You are required, within two months after you shall have celebrated such marriage, to return this
License to me, at my office, with your signature subscribed to the certificate under this License, and with
blanks therein filled according to the facts, under penalty of forfeiting two hundred dollars to the use of
any person who shall sue for the same.

(Signed)

Lycurgus Koller

REGISTER OF DEEDS.

1. Name of person applying for license.
2. Name of man to be married, in full.
3. Residence.
4. Age.
5. White or Colored.
6. Father of man to be married.

7. Mother of man to be married.
8. Living or dead.
9. Living or dead.
10. Residence if known, if not, state unknown.
11. Name of woman to be married, in full.

12. Residence.
13. Age.
14. White or colored.
15. Father's name.
16. Mother's name.
17. Living or dead.

18. Living or dead.
19. Residence if known, if not, state unknown.
- *If both parties are over 18 years of age, strike out.

STATE OF NORTH CAROLINA,

Gates

COUNTY.



I, ¹ Jas. A. Sparkman a ² Justice of the Peace
united in matrimony ³ R. S. Johnson
and ⁴ Sue Pope the parties licensed above, on the
day of ⁵ May 1898, at ⁶ Eure N. C.
in ⁷ , in said County, according to law.

*WITNESSES PRESENT AT MARRIAGE:

(Signed) C. H. Vinson of Gates Co. N. C.
(") R. B. Harrell of " " " "
(") J. E. Storey of " " " "
(Signed) J. A. Sparkman J. P.

1. Name of person officiating.
4. Name of woman married.

2. If Minister, of what denomination; If Justice of the Peace, so state.
5. Place of marriage.
6. Township.

3. Name of man married.
- *At least three persons present at marriage must sign as witnesses.

No. _____

and



Marriage License.

Returned on the _____ day of

_____ 190____, and

registered in New Marriage Register, on

page _____, this _____

190____

REGISTER OF DEEDS.

Return to Register of Deeds.

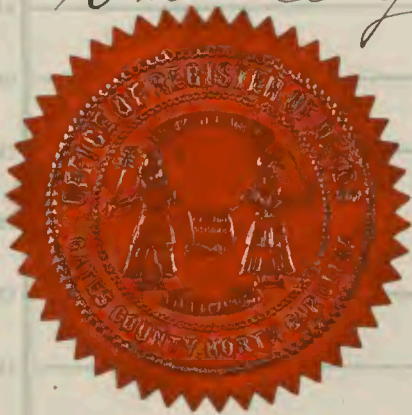
NOTE—Minister or Justice is required to fill the blanks in the certificate and return the License within two months after marriage.

North Carolina }
Gates County. }

I, Lycurgus Hofler,
Reg. Deeds of Gates County, in
the State of North Carolina, do
hereby certify that the fore-
going is a true and
exact copy of the marriage
License issued from this
office May 9, 1899, and
that the certificate thereto
attached is a true copy of
the original certificate of
J. A. Sporkman the J.P. offici-
ating.

Given under my hand
and official seal of office
in Gatesville, N. C. on the
15th day of April 1902

Lycurgus Hofler
Reg. Deeds - as
foresaid,



The depositions of A.L.Saunders, J.R.Delk, J.F.Uzzell, M.L.Underwood and W.B.Pruden taken before me, J.P.Lee, a Notary Public for the County of Nansemond and State of Virginia, at the office of S.E.Everett , in the Town of Suffolk, Nansemond County, Virginia, on the 1st. day of April 1902, between the hours of eleven o'clock A.M. and four o'clock P.M. to be read in behalf of the plaintiff, H.Symes Johnson, as evidence in a certain suit depending in the Circuit Court of Nansemond County, where in H. Symes Johnson is plaintiff and Sue Pope Johnson is defendant.

Present: S.E.Everett, Counsel for Plaintiff .

Present.....Counsel for defendant

A.L.Saunders, being duly sworn, deposeth and saith as follows:

Q.1. Give your name, age , residence and occupation, and do you know the parties to this suit?

A. A.L.Saunders, 37 years old, Windsor, Va. , Undertaker. Yes.

Q.2. Are you related to the parties to this suit?

A. Yes, distantly.

Q. 3. How?

A. His grandfather and my mother were brother and sister.

Q. 4. Did you live near them when they last lived together?

A. I lived in Isle of Wight County and he lived in Nansemond County, about seven miles apart.

Q. 5. When did they last live together?

A. In December, 1898. or in the fall of 1898. I am not certain whether it was September, November or December.

Q. 6. Do you know why they separated and as to whether Mr. Johnson deserted his wife or his wife desert him?

A. I have heard her abuse him and my impression was that she would

not stay with him and that it was so well understood in the neighborhood that she did not care for him and would not live with him, that I had never thought of it in any other way but that she left him. I know the day that I heard her abusing him, that I really thought that he ought to have slapped her, and while I object to such as this, I think if she had been ~~my~~ wife I would have slapped her.

Q. 7. Do you know whether she refused to stay with him or not?

A. Mr. Johnson wanted me to go to see her and see if she would not remain with him as a wife, but I did not go.

Q. 8. Why did you not go?

A. I had heard so much, I thought it would be useless for me to go see her. Others did go and had a talk with her, and she refused to go back to him.

Q. 9. Where did she go when she left her husband?

A. She went to her mother's and shortly after that, she went to Baltimore, where she has been ever since that time.

Q. 10 Do you know whether she had a cause to desert her husband or not?

A. As far as I know he was good to her and gave her no cause for leaving, and I do know that she left him without his consent, for he was at my house often after she left him and I know from his conversation, that he was grieved over her leaving him, and I am satisfied that he loved her.

X II. He was a faithful husband and he tried to do his duty towards her, and have peace in the family.

Q. II Why did she leave him?

A. My opinion is that she did not love him, and why this was, I think her mother brought about the trouble and she had trouble with Mr. Johnson. I mean she would abuse him over nothing and her daughter, Lizzie Johnson commenced to take sides with her mother, and finally she got so ~~so she got so~~ she did not care for him and left him.

And further this deponent saith not.

.....A. Lee. Saunders.....

J. R. Delk, being duly sworn, deposeth and saith as follows:

Q. 1. Give your age, name, residence and occupation, and do you know the parties to this suit?

A. J. R. Delk, 51, Mansemond county, farmer, and I know the parties to this suit.

Q. 2. Do you know the parties to this suit and are you related to either of them?

A. I know the parties well, am not related to either one of them.

Q. 3. Do you know when and where they were married?

A. They were married in North Carolina in the year 1897.

Q. 4. How far did you live from them?

A. About four miles and one-half.

Q. 5. Do you know when they separated and as to whether Mr. Johnson left his wife or she left him?

A. They separated in the year 1898. I know in the latter part of the summer of 1898 they were not living together.

I know this, she told me that she left him and went to her mother's and would not go back to him. A little while after this she left and went to Baltimore and is there yet, as far as I know.

Do you know whether ~~she~~ treated her kindly or not?

A. I do not know of anything bad he ever did ~~to~~ her. He had the reputation in the community of providing for her as well as ~~the~~ his position in life would permit. I have heard the store keeper ^{say} that he purchased his goods and groceries from ^{him and heard him} ~~her~~ speak well of ~~him~~ and said that he cared for her well.

Q. 7. Do you know why she deserted him?

A. I heard her say that he did not provide for her as she wanted him to, and that she was not going to stay with him.

Q. 8. When did you hear her say this?

A. Some time in the fall of 1898 that Mr. Johnson came to us and asked I mean Mr. Uzzell and myself, and asked us if we would go over to see his wife at her mother's and see if she would not come back to him. I went over there with Mr. Uzzell. He did most of the talking, but I did hear her say while Mr. Uzzell was talking to her, that she did not ever ~~xxxxxx~~ expect to return to him.

Q. II. How do you know that she left Mr. Johnson and Mr. Johnson did not leave her?

A. I know that he was left alone by her at his home and then I know that she told me that she left him. I saw her several times at her mother's .

Q. I3. Did you ever go to see her , to see if you could get her to return to her husband?

A. I went ^{several} to see her ~~several~~ times. Mr. Johnson asked me to go. Mr. Johnson was anxious for her to come back and live with him, but she would tell me that ~~she~~ she did not intend to live with him that he was too poor to give her what she wanted and said that he could not take care of her unless he would go to Baltimore then after she decided to go to Baltimore I went to see her several times then, but then she said that she would not live with her husband, Mr. Johnson anywhere, Baltimore or anywhere else.

Q. I3. Do you know why she left?

A. She claimed that ^{she} did not stay with her husband because that he was not able to take care of her, but I thought that she did not care anything about him and was just trying to get rid of him.

~~XXXXXX~~ I did not think the excuse that she gave was a good one because they were young when they married and both were poor, but Mr. Johnson was farming and was a good worker and was making plenty for them to get along on.

Q. I5. Do you know whether he was kind in giving her money for her to spend or not?

A. I think he was too good to her. That he gave her nearly every dollar he made. I know I bought some peanuts from him and he gave her all of that money. I think that the money that carried her to Baltimore was the money saved up from time to time that Mr. Johnson gave her.

Q. I6. Is there anything else that you know about this case that you have not stated?

A. I have told about all that I know. I know this, and I have about stated that , that she left him without any cause whatever and that he loved her and was anxious for her to come back to him and that I tried my best to get them to live together, but

would not do so.

Q. 9. Did she give any reason for not going back to her husband?

A. Nothing more than what I have just said. That is that he did not provide for her as she wished him to.

Q. 10. Do you know whether or not he did provide for her as well as a man in his position would?

A. I have seen them together. I had no reason to think he did not provide for her and I thought they were getting along nicely together until I had heard that she left him.

Q. 11. What is your opinion as to whether she meant what she said about his not providing for her?

A. I do not like to say what her meaning was, but I believe that she did not want to stay with him any way, and she made this remark in the way of an excuse for acting like she did.

And further this deponent saith not.

J. R. Delf
.....

J.F.Uzzell being duly sworn, deposeth, and saith as follows:

Q. 1. Give your name, age, residence and occupation.

A. J.F.Uzzell, 50 years. I live in Nansemond County. I am a farmer

Q. 2. Are you related to the parties to this suit?

A. No, Sir.

Q. 3. Do you know when they were married?

A. Some time in the year 1897. In Gates County, N.C.

Q. 4. Are they living together to-day?

A. No, Sir.

Q. 5. How long have they been parted?

A. They lived together about one year and then separated some time during the year 1898.

Q. 6. Were they living in the house to themselves when they separated?

A. They were living alone to themselves.

Q. 7. Did he leave her there ~~and~~ did she leave him there?

A. She left him there.

Q. 8. Where did she go?

A. She went to her mother's.

Q. 9. Is she at her mother's now?

A. I suppose she is.

~~XXXX~~ When she left Mr. Johnson, her husband, and went to her mother, (her mother then lived in Nansemond County), but she did not stay there long before she moved to Baltimore and then a short while after that, her mother went to Baltimore also, and as far as I know, they have been living there ever since.

Q. 10. Mr. Johnson has stated in his bill in this suit that he has been a constant, faithful and dutiful husband, discharging all his duties and obligations as a husband, to the best of his ability. State as to whether you know this to be true or not?

A. What he has said is true, that ^{have} I visited the home when they were living together and I am satisfied that he did his duty as a husband and I am satisfied that he was a faithful husband. Mr. Johnson was not rich but he provided for his wife like other men in his position.

XXXXX.

She stubbornly refused to ever have any more to do with him.

Q. I7. Was she a woman of right much temper?

A. She had as much as a meat ax and she would have her way regardless of love or ~~re~~spect or anything else.

And further this deponent saith not.

.....J. F. Rizzell.....

Mr. M.L.Underwood being duly sworn deposeth and saith as follows:

Q. 1. What is your name, residence, age and occupation?

A. M.L.Underwood, 39 years, Nansemond County, merchant.

Q. 2. Are you related to the parties to this suit?

A. No, Sir.

Q. 3. State fully what you know about this case?

A. I have been knowing Mr. Johnson all his life and have known his wife about twelve years. Mr. Johnson I know to be a man of agood reputation ~~whxxx~~ quiet and well disposed, but she was a a woman of self will and bad disposition, I would rather say that I heard she was a woman of a bad disposition, in other words, that was her reputation. I think they sep~~er~~ated some time in the year 1898. I do not know why she left him. I just know what was the general neighborhood talk and that was that she was tired of him and had left him. I do not think she had any cause to leave him. He was as good as she was and I always considered him her superior and as far as her giving any excuse that he would take care of her, I could not believe that, because I know that he was a good worker and I believe he was ~~k~~ kind to her. I did not see him until some time after she had left. I think that he was ver y much greived over her leaving him. As soon as I had heard ~~she~~ he had left him, I said then, that it was the best thing that ev~~l~~r happened to Johnson even though he was sorr^{er}ful.

Q. 4. Is there anything more that you know about the case?

A. I think I have said about all I know about this caes. ~~P xxxxxxx~~
He is a boy that I have always looked on as being ~~an~~ honest and straight f^oward in every way and he has my best wishes.

And further this deponent saith not.

M. L. Underwood

Mr. W.B.Pruden being duly sworn deposeth and saith as follows:

Q. 1. What is your name, age, residence and occupation?

A. W.B.Pruden, 48 years old, Nansemond County, I am a farmer.

Q. 2. State fully what you know about this case?

A. I have been knowing Mr. Johnson about eight years, his wife I have been knowing all her life. I know very little about it only the neighborhood talk, and it seemed that every^{body} ~~body~~ blamed her for leaving him as she did. I know Mr. Johnson was a working man and believ that he provided for her well and was kind to her. I have never heard any-body complain of Mr. Johnson in this matter. It seems that the neighborhood was of one opinion, that she left her husband without any cause.

Q. 3. How old do you think she was ?

A. About twenty-three when he married her.

And further this deponent saith not.

.....*W.B.Pruden*.....

STATE OF VIRGINIA, NANSEMOND COUNTY, TO-WIT:

I, J.P.Lee, a Notary Public, for the County and State of Virginia, do certify that the foregoing depositions of A.L.Saunders, J.R.Delk, J. F.Uzzell, M.L.Underwood, and W.B.Pruden were taken, sworn to, and subscribed before me at the place and time mentioned therein and in the caption thereto. *My term of office expires on the 14th of May, 1905.*

In witness whereof I have hereto set my hand on this 1st. day of April, 1902, in the County and State aforesaid.

.....*J.P.Lee*.....
N.P.

H.Symes Johnson.....Complainant.

Against: in chancery.

Sue Pope Johnson.....Defendant.

This cause, in which the complainant has proceeded against the said Sue Pope Johnson in the mode prescribed by law ^{as to} ~~against~~ ~~the~~ absent defendants, and she still failing to appear and plead, answer or demur, came on this day to be heard on the bill and depositions of A.L.Saunders, J.R.Delk, J.F.Uzzell, M.L.Underwood and W.B.Pruden and was argued by counsel.

On consideration whereof, the court being of the opinion, from the evidence furnished in the cause that the defendant, Sue Pope Johnson, willfully ~~deserted~~ the said H. Syme~~s~~ Johnson as charged in the bill, doth order, adjudge, and decree that the said plaintiff, H.Symes Johnson be divorced from the said defendant, Sue Pope Johnson, and that the marriage heretofore solemnized between them be wholly and entirely dissolved, and that all the right, title and interest of the said defendant in the estate of the said Plaintiff shall henceforth cease and determine and the court doth further order, adjudge and decree that the said, Sue Pope Johnson pay unto the plaintiff, H.Symes Johnson, his costs expended in the prosecution of this suit. And nothing further remaining to be done, it is ordered that this cause be stricken from the docket.

.....
H. Symes Johnson.

Against: in chancery-

Sue Pope Johnson.
.....

Enter. ¹⁵.....April, 1902.

Robert R. Dentis

.....
Entered in Chancery Order Book

No. ³... on page. ⁴¹⁰..

TO THE HON. ROBERT R. PRENTIS, JUDGE OF THE CIRCUIT COURT OF NANSEMOND COUNTY.

Complaining, sheweth unto your honor your orator, H. Symes Johnson husband of Sue Pope Johnson, the following case:

That he has been a resident of this State over twelve months and last cohabited with the said Sue Pope Johnson, his wife, in Nansemond County, that in the year one thousand eight hundred and ninety ~~Eight~~ (1898) your orator was married to the said Sue Pope Johnson in Gates County, N.C. A certificate of such marriage is herewith filed marked Exhibit "A" and asked to be read as a part of this bill, and since that time, as far as the said Sue Pope Johnson would permit, your orator has been to ^{her} a constant, faithful and dutiful husband, discharging all his duties and obligations as a husband to the best of his ability. Your orator's wife, the said Sue Pope Johnson, on the other hand, has been negligent, cold and indifferent as a wife and often was abusive to your orator and on November in the year one thousand eight hundred and ninety eight (1898) the said Sue Pope Johnson willfully deserted and abandoned your orator without just cause and has never since returned and your orator has been anxious for her to return and has done all within his power to get her to return and has had friends to go to see her and ask her if she would not go and live with him again, but she stubbornly refused to do so, stating that she did not love him and she did not want to live with him and never intended to return to her former home.

IN TENDER CONSIDERATION WHEREOF, for-as-much as your orator is remediless in the premises save in the court of equity, ^{prayer} that the said Sue Pope Johnson may be made a defendant to this bill and required to answer the same upon oath; that your orator may be divorced from the said Sue Pope Johnson, a vinculo matrimonii, and that all such other ^{further} and general relief may be afforded your orator as the nature of his case may require or the equity shall seem meet. And your orator will ever pray.

Counsel.....

S. E. Everett..... *H. Symes Johnson*.....

STATE OF VIRGINIA

NANSEMOND COUNTY TO-WIT:

I, S.E. Everett, a Notary Public for the County and State aforesaid do
certify that H. Symes Johnson, the complainant in the above bill has this
day appeared before me in my County ~~and State~~ aforesaid and made oath
that all the facts in the above bill are true.

Given under my hand this ^{17th} day of ~~March~~, 1902.

.....*S. E. Everett*.....

Notary Public.

S. E. Everett P. M.

H. Syner Johnson
vs. Rice

See Page Johnson

N Syms Johnson
against In Chancery
Sue Pope Johnson
Chancery Rules

1902 February 13th. Process issued returnable
to February Rules 3rd Monday

" " Order of Publication, ^{for 4 weeks} deft
a non resident

" 17. Bill filed.

March 14. Set for hearing in order
of publication.

Chancery Rules
