

1911-006
Nansemond Co (Suffolk)

Chancery Causes: Flocine Pugh vs Dink Pugh

Lassiter, Werrell, Artis, Perry

Received from P.H. Hawley, Atty
Sept. 16th 1911
Leif $\frac{50}{100}$ — Dollars
account writ tax and clerks fees
~~Cook Subject to Correction~~ in care
of Florence Pugh in Clerk Pugh.

\$ 6 $\frac{50}{100}$

R.R. Smith Clerk
By M.M. Waskins D.C.

R. R. Smith Clerk of the Circuit Court
of Macon County:

Florence Pugh }
 ^{rs} } De. Chaney.
Sient Pugh }
 } Plff.
 } Def.

Issue summons for plaintiff against
defendant to 2nd Sept. unless (third Monday)
1911 to answer said plaintiff of a
bill in chancery.

R. H. Raeburn Jr.

3-99 \$6.50 Paid
Sept 16/11 - P. C.
M. H. H.

Levin near Stevan Station.

Mr. R. R. Smith: within 30 days.
I will, personally for you all
the fees and costs in the above case myself
so that you need not take either to the plaintiff
or defendant for them. Sept. 4 1911.
R. H. Raeburn.

CHANCERY SUMMONS.

THE COMMONWEALTH OF VIRGINIA.

TO THE SHERIFF OF NANSEMOND COUNTY—GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON Dink Pugh

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 September, 1911,, to answer a Bill in Chancery, exhibited against him in the said Court by Florence Pugh

And have then and there this summons.

Witness. R. R. SMITH, Clerk of our said Court, at his office, this 5th day of September, 1911, ~~XX~~, in the 13^{6th} year of the Commonwealth.

~~A copy~~ Teste:

~~CLERK.~~

Teste:

R. R. Smith
By M. M. Warrens ~~CLERK.~~

Executed this 13th day of Sept 1911 by delivering
a true copy of the within ~~deed~~ to Hinko Pugh
in person in the County of Nansemond
Nat

Asst Sheriff
By Harry Hallam Deputy.

Attest
C. H. Rawles p. q.

Hinko Pugh

vs.

IN CHANCERY.

Hinko Pugh

1911

September Rules.

Thurs Monday.

NANSEMOND CIRCUIT COURT.

PROCESS BOOK, No. 3.

PAGE

TO DINK PUGH:

Please take notice that I shall on the 5th day of October 1911, between the hours of 8 A. M. and 6 P. M. of that day, at the office of R. H. Rawles, on Washington Square, in Suffolk, Virginia, proceed to take the depositions of Narcissa Powell, John A. Perry, and others, to be read as evidence in my behalf, in a certain suit in equity depending in the Circuit Court of Nansemond County, Virginia, wherein I am the plaintiff, and you are the defendant; and if from any cause the taking of the said depositions be not commenced on that day, or if commenced and be not concluded, the taking of the same will be adjourned and continued from day to day, or from time to time, at the same place and between the same hours, until the same shall be completed. Of all of which you will please take notice and govern yourself accordingly.

Florence Pugh
R. H. Rawles, Counsel.

Executed this 15th day of Sept 1911 by delivery
a true copy of the within notice to
Hinks Pugh in person in the County
Manassas of Virginia

J. H. Baker Sheriff
By Hardy Halland H. S.

Notice to Take
Depositions.

The depositions of George Lassiter, and others, taken before me, L. Pretlow Holland, a Commissioner in Chancery, for the Circuit Court of Nansemond County, Virginia, at the office of R. H. Rawles, in Suffolk, Virginia, pursuant to notice hereto annexed, on the 5th day of October, 1911, between the hours of eight A. M. and six P. M. to be read as evidence on behalf of Flocine Pugh, in a certain suit in equity depending in said court, wherein the said Flocine Pugh is plaintiff, and Dink Pugh is defendant.

PRESENT:

R. H. Rawles, counsel for plaintiff.

The defendant did not appear either in person or by counsel.

George Cassiter

being duly sworn deposes and says

as follows:

Q. State your name, age residence, occupation, and if you know the parties to this suit?

A. George Cassiter, 45 years. Massanut County near Mapwood, farmer, and I know both the parties.

Q. State how long you have known the plaintiff and the defendant?

A. I have known both of them ten or twelve years: have known the defendant all his life: partly raised him.

Q. State where the plaintiff, Flocine Pugh now resides?

A. Both of them live near Mapwood station in Massanut County Virginia and about half a mile from me, and have been for several years: ever since they were married.

State how long she has been residing there continuously?

A. Several years: ten or twelve years and she lives right there.

Q. State if you know where the defendant Dink Pugh now is, and where he resides?

A. He still lives right near me, but not with his wife: right at the neighborhood.

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Q. State if you know where the defendant Dink Pugh is now living with his wife, the plaintiff Flocine Pugh.

A. No he ~~is~~ is not and has not been for three or more years.

Q. State how and why you are aware of this fact?

A. Because I live within half a mile of them and see them both almost daily, and I certainly know he is not now living with her.

Q. Can you state how long it has been since the said Dink Pugh has lived with the said Flocine Pugh as his wife?

A. In the month of July 1808 he left her and went to live elsewhere.

Q. Do you know about when he left her and her house and home and went away and where he went? If so state the same.

A. In July 1808: he left his wife and went to live by himself - stayed with Peter Hubbard for awhile - then went to himself: he works alone there now, in some neighborhood in this County.

Q. State anything you may know in regard to the character, morals, habits and other qualities of the plaintiff, Flocine Pugh?

A. I have been knowing her for a long time: She is a very good and industrious woman, she has the respect of the whole neighborhood. Her morals are good she is kind.

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Q. State if you know how she acted toward her said husband, Dink Pugh, when they lived together?

A. She acted all right. She did her part as a good wife should: washed every day and kept him pretty. She was kind toward him, and dutiful. She made him an excellent wife.

Q. State if you know whether she did everything that a dutiful wife should do toward her said husband while they were living together?

A. She certainly did.

Q. State if you know ^{why} ~~when~~ the said Dink Pugh left or abandoned and deserted his said wife, Flocine Pugh?

A. He got mixed up with another woman: her name is Annie Atkins. She is not married, but has had two children: the last one is said to be the child of Dink Pugh; it is not a year old.

Q. State if you know whether or not the said Dink Pugh has ever since that time above mentioned when he left and deserted her, ever returned to live with her?

A. No he has not.

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Q. State your opportunities for knowing the above facts, and tell why you know them?

A. Because, I know them both intimately. I live right by them, and even now I see them both almost every day. and because it is a patent and well known fact, that he has not returned to live with her, I would certainly have known it if he had.

Q. The plaintiff in her bill says that she was married to her husband in December, 1906, and that he abandoned her in the month of ~~July~~ 1908, and that he has ever since that time been away from her and completely abandoned and deserted her. Tell

anything you may know in confirmation of this charge against him, and whether the same is true or otherwise?

A. He certainly left her in July 1908 and he certainly has never since returned to live with her. He has abandoned and deserted her.

Q. Tell if you know why he left and deserted her?

A. The only reason I know is the other woman already mentioned. He is very intimate with the other woman. He did not have any good reason to leave his wife.

1911

Q. Can you say of your own knowledge that the said defendant has abandoned and deserted his wife, for more than three years before the commencement of this suit?

A. Yes I can.

Q. Where did the plaintiff and the defendant last cohabit?

A. In Nansemond County Virginia.

Q. Do the plaintiff and defendant both now reside in Nansemond County, and have they both been domiciled here for more than one year next preceding the commencement of this suit?

A. Yes.

Q. State any other facts you may know in reference to this case, and in reference to the other charge of adultery, which the plaintiff makes against the defendant?

A. The woman Ann Antis lives with in the same neighborhood; Annie Pugh is very intimate with her. She has recently given birth to a child and the whole neighborhood know so. It is Annie Pugh's child; he does not deny it. And further this defendant said not.
George A. ^{his} Cassiter

Witness: S. P. Halland

Lora Warrall

being duly sworn deposes and says

as follows:

Q. State your name, age residence, occupation, and if you know the parties to this suit?

A. Lora Warrall, 23 years. Near Magnolia Va. and near the plaintiff and defendant whom I know quite well. Housework is my occupation.

Q. State how long you have known the plaintiff and the defendant?

A. I have known the defendant since birth all my life: have known the plaintiff for six or seven years.

Q. State where the plaintiff, Florence Pugh now resides?

A. Near me - within $\frac{3}{4}$ of a mile: and near Magnolia in this County and State.

State how long she has been residing there continuously?

A. From or six years.

Q. State if you know where the defendant Birt Pugh now is, and where he resides?

A. Right down there: about $\frac{1}{2}$ mile from me in same County.

Q. State if you know where the defendant Dink Pugh is now living with his wife, the plaintiff Flocine Pugh.

A. He is not.

Q. State how and why you are aware of this fact?

A. I see them daily. He has left her and moved away: if they were living together I would certainly know it.

Q. Can you state how long it has been since the said Dink Pugh has lived with the said Flocine Pugh as his wife?

A. A little more than three years.
It was in July 1908.

Q. Do you know about ^{why} ~~when~~ he left her and her house and home and went away and where he went? If so state the same.

A. No reason has ever been given except his vagabondage: he goes out and comes back and has been ever since he left his wife.

Q. State anything you may know in regard to the character, morals, habits and other qualities of the plaintiff, Flocine Pugh?

A. She is an excellent woman. Never heard her converse about.

Q. State if you know how she acted toward her said husband, Dink Pugh, when they lived together?

A. She made him a splendid wife; tried to help him make an honest living. Never heard any complaint from him about her.

Q. State if you know whether she did everything that a dutiful wife should do toward her said husband while they were living together?

A. She certainly did.

Q. State if you know when the said Dink Pugh left or abandoned and deserted his said wife, Flossie Pugh?

A. He left her in July 1898; he has never since returned to live with her. I think he became in love with the other girl; that is the reason given in the neighborhood why he left her.

Q. State if you know whether or not the said Dink Pugh has ever since that time above mentioned when he left and deserted her, ever returned to live with her?

A. He has not.

-4-

Q. State your opportunities for knowing the above facts, and tell why you know them?

A. I have met them & know both.

Q. The plaintiff in her bill says that she was married to her husband in December, 1906, and that he abandoned her in the month of ~~January~~ 1908, and that he has ever since that time been away from her and completely abandoned and deserted her. Tell anything you may know in confirmation of this charge against him, and whether the same is true or otherwise?

A. It is certainly true.

Q. Tell if you know why he left and deserted her?

A. Well, I can only judge by facts as they appear. He seemed to get tired of his wife; when he began to go with the artist girl. He now goes with her. She has a young child. I feel sure he keeps to support the artist girl. He gave me money for the artist girl when the child was a week old. I gave it to her and gave her the deposit receipt.

Witness
L. P. Holland.

Lora Warrell

Arrie Artis

being duly sworn, deposes

and says as follows:

Q. State your name, age, residence, occupation, and if you know the parties to this suit?

A. Arrie Artis, 22 years, near Magnolia in Laurens County Virginia, factory girl, and I know both the parties.

Q. How long have you known both of them?

A. Five or six years.

Q. Where do they now reside?

A. Near Magnolia in said County.

Q. Is the defendant Dink Pugh, now living with his wife the plaintiff?

A. No he is not.

Q. How do you know this?

A. Because I live near them both.

Q. Do you know about when he left her and went to live elsewhere?

A. About three years ago.

-2-

Q. Please state if you are married or single?

A. Single.

Q. Have you ever been married?

A. No.

Q. Have you not within the last twelve months given birth to a child?

A. Yes.

Will you tell us who is the father of that child?

A. Dink Pugh, the defendant in this case.

State whether the said Dink Pugh has given you money or other help either before or after the birth of the said child?

A. Yes he has helped me some.

And further this deponent saith not.

Witness: L. P. Holland.

Curia Artis

Lucrétia Pugh

being duly sworn deposes and says

as follows:

Q. State your name, age residence, occupation, and if you know the parties to this suit?

A. Lucrétia Pugh, 41 years, near Magnolia Station in Harrison County Virginia & near the parties, husband, and I know both the parties quite well: have been knowing them several years: have known Dink Pugh all his life even since he was an infant.

Q. State how long you have known the plaintiff and the defendant?

A. For many years as stated above.

Q. State where the plaintiff, Flocine Pugh now resides?

A. Right near Magnolia in Harrison County Virginia and about half a mile from me.

State how long she has been residing there continuously?

A. For four or six years.

Q. State if you know where the defendant Dink Pugh now is, and where he resides?

A. He works at the brick yard in same neighborhood and county: he lives in house by himself right down there.

-2-

Q. State if you know where the defendant Dink Pugh is now living with his wife, the plaintiff Flocine Pugh.

A. No, he certainly is not.

Q. State how and why you are aware of this fact?

A. Because I live right down there in half a mile of them. I know both great well: I see them both almost daily and I know he is not living with her. She lives where they both formerly lived and he has left and moved to another house.

Q. Can you state how long it has been since the said Dink Pugh has lived with the said Flocine Pugh as his wife?

A. He left her in July 1908. And moved to the other house.

Q. Do you know about when he left her and her house and home and went away and where he went? If so state the same.

A. In July 1908.

Q. State anything you may know in regard to the character, morals, habits and other qualities of the plaintiff, Flocine Pugh?

A. She is a very smart, intelligent, hard working woman. Her morals and character are good. Never heard anything against her in my life.

-3-

Q. State if you know how she acted toward her said husband, Dink Pugh, when they lived together?

A. She was kind and true to him: She helped him to work and make a living and treated him just like a good wife should. He had no cause to complain. I never heard him complain of her in my life.

Q. State if you know whether she did everything that a dutiful wife should do toward her said husband while they were living together?

A. She certainly did. She did the part well.

Q. State if you know ^{why} ~~when~~ the said Dink Pugh left or abandoned and deserted his said wife, Flocine Pugh?

A. No woman has ever been given except another woman came between them. That is Anna Curtis woman who lives down there. She has never been married, but has two little children. She gets into her a good deal.

Q. State if you know whether or not the said Dink Pugh has ever since that time above mentioned when he left and deserted her, ever returned to live with her?

A. He has not.

-4-

Q. State your opportunities for knowing the above facts, and tell why you know them?

A. Because I have right there of them both and know about their social affairs pretty well. I see them almost daily. It is a well known fact in the neighborhood that he has left her, and he has not returned since he left in July 1908. I would have known it if he had.

Q. The plaintiff in her bill says that she was married to her husband in December, 1906, and that he abandoned her in the month of July 1908, and that he has ever since that time been away from her and completely abandoned and deserted her. Tell anything you may know in confirmation of this charge against him, and whether the same is true or otherwise?

A. Her charge is certainly true. He certainly left her in July 1908 and he has not since returned to her with her or had anything to do with her as his wife.

Q. Tell if you know why he left and deserted her?

A. I know of no reason except the fact that of her, and because she saw another that he liked better. No one in that neighborhood knows of any other reason. She gave him no cause to leave or he did

Q. Can you say of your own knowledge that the said defendant has abandoned and deserted his wife, for more than three years before the commencement of this suit?

A. Yes.

Q. Where did the plaintiff and the defendant last cohabit?

A. In Mannum Co. Va

Q. Do the plaintiff and defendant both now reside in Mannum County, and have they both been domiciled here for more than one year next preceding the commencement of this suit?

A. Yes.

Q. State any other facts you may know in reference to this case, and in reference to the other charge of ^{Adultery} -----, which the plaintiff makes against the defendant?

A. I only know that Clark has left his wife; that he goes with Anna Atkins and is intimate with her. That she is an unmarried woman and has never been married. She has two small children; one not quite a year old. She neighbors all say it is Clark's. He does not deny it.

Witness:
L. P. Holland - Lucresha Pugh

John A. Perry

being duly sworn deposes and says

as follows:

Q. State your name, age residence, occupation, and if you know the parties to this suit?

A. John A. Perry, 59 years, near Maprobia in Nausumund County Virginia, about 600 yards from the plain off, and not far from the defendant, I know both parties well.

Q. State how long you have known the plaintiff and the defendant?

A. About ten years.

Q. State where the plaintiff, Flocine Pugh now resides?

A. Near Maprobia in Nausumund County Va. about 600 yards from me.

State how long she has been residing there continuously?

A. Ever since I have known her.

Q. State if you know where the defendant Dink Pugh now is, and where he resides?

A. He works at the brick yard: in the same neighborhood and County: half a mile from me.

-2-

Q. State if you know where the defendant Dink Pugh is now living with his wife, the plaintiff Flocine Pugh.

A. He is not.

Q. State how and why you are aware of this fact?

A. Because I live right there and see them both almost daily.

Q. Can you state how long it has been since the said Dink Pugh has lived with the said Flocine Pugh as his wife?

A. A little over three years; going on to four years.

Q. Do you know about when he left her and her house and home and went away and where he went? If so state the same.

A. In July 1908, and he went to live at another home right near me.

Q. State anything you may know in regard to the character, morals, habits and other qualities of the plaintiff, Flocine Pugh?

A. It is very good. Never heard anything against her in my life.

-3-

Q. State if you know how she acted toward her said husband, Dink Pugh, when they lived together?

Very well indeed. She seemed to me to be a model wife. Did all her duties as a wife. Never heard him complain of her.

Q. State if you know whether she did everything that a dutiful wife should do toward her said husband while they were living together?

A. She certainly did.

Q. State if you know ^{why} ~~when~~ the said Dink Pugh left or abandoned and deserted his said wife, Elcine Pugh?

A. No reason appeared except he became attracted to another girl: ²⁰ ~~man~~ ^{man}, ~~that~~ ^{that} a married man should. That is the artist girl.

Q. State if you know whether or not the said Dink Pugh has ever since that time above mentioned when he left and deserted her, ever returned to live with her?

A. He never has.

Q. State your opportunities for knowing the above facts, and tell why you know them?

A. Because I live right by them both. I know their going and coming and their daily life. He could not well have come back to his wife or his husband without my knowledge especially when he has been gone for over two years. It would have been seen and known of me if he had.

Q. The plaintiff in her bill says that she was married to her husband in December, 1906, and that he abandoned her in the month of ~~July~~-----1908, and that he has ever since that time been away from her and completely abandoned and deserted her. Tell anything you may know in confirmation of this charge against him, and whether the same is true or otherwise?

A.

It is true for a certainly. There is no question about it. It is beyond dispute.

Q. Tell if you know why he left and deserted her?

A.

No reason except the other woman. That is generally the case when a married man forgets his duty towards his wife. She certainly never gave him any occasion for deserting her.

Q. Can you say of your own knowledge that the said defendant has abandoned and deserted his wife, for more than three years before the commencement of this suit?

A. I can.

Q. Where did the plaintiff and the defendant last cohabit?

A. In Hansemond Co. Va.

Q. Do the plaintiff and defendant both now reside in Hansemond County, and have they both been domiciled here for more than one year next preceding the commencement of this suit?

A. Yes.

Q. State any other facts you may know in reference to this case, and in reference to the other charge of Adultery, which the plaintiff makes against the defendant?

A. Nothing but hearsay, but which I say never been denied by Clark. I know he goes with Annie Atkins and is intimate to her. He has a young child, but has never been married, and from this I infer such and such.

Witness: L. P. Holland. John A. ^{this} Perry _{marked}

Flocine Pugh, being duly sworn deposes and says as follows:

Q. State your name, age, residence, occupation, and if you know the parties to this suit?

A. Flocine Pugh, age about 18 or 19 years, residence, near Magnolia, in Nansemond County, Virginia, I am the plaintiff, the defendant is my husband.

Q. Is your husband now living with you?

A. He is not.

Q. When did he leave you?

A. In July, 1908.

Q. Has he ever since that time returned to live with you?

A. He never has.

Q. Did you ever give him any cause to leave you that you are aware of.?

A. No, I never did, I did my part the very best I could, and did everything I could to make his life a happy one.

Q. Do you know why he left you?

A. I have stated the reason as fully as I could in the bill in this cause. I think the reason was because he became in love with another girl right down there near us, he certainly became very attentive to her and went with her a good deal, and after he got mixed up with her, he seemed to grow tired of me, until he finally went away in July, 1908, and left me completely, and he has never since returned.

Q. What is the name of the other girl?

A. Arrie Artiss.

Q. Is she married?

A. No, and never has been. She has two children. The youngest one is not quite a year old. My husband is nearly always with her. Everybody down there says he is the father of said child. He does not deny it. Certainly some man is its father: and my husband is the only man that goes with her. I can never again have him with me as his wife and further than I should wish not. Flocine Pugh.

Witness: L. P. Holland.

VIRGINIA, NANSEMOND COUNTY, to-wit:

I, L. Pretlow Holland, a Commissioner in Chancery, for the Circuit Court of Nansemond County, in the State of Virginia, do certify that the foregoing depositions of George Lassiter and others, were duly taken, subscribed and sworn to before me, at the office of R. H. Rawles, in Suffolk, Virginia, on the 5th day of October, 1911, between the hours of eight A. M. and six P. M. to be read as evidence in the case of Flocine Pugh vs. Dink Pugh, now pending in said court.

Given under my hand this 5th day of October, 1911.

L. P. Holland
Commissioner in Chancery

Gu - \$5.00
Paid.

IN THE CIRCUIT COURT OF NANSEMOND COUNTY:

Flocine Pugh

vs.

In Chancery.

Dink Pugh.

which has been regularly matured and set for hearing
This cause came on this day to be heard on the bill, and the depositions of George Lassiter, and other witnesses taken after due notice to the defendant, and the defendant, who has been served with notice, and who has been proceeded against in the manner required by law, failing to plead answer, or demurr, and was argued by counsel.

On consideration the court being of opinion that the defendant Dink Pugh has abandoned and deserted his wife, the plaintiff Flocine Pugh, for upwards of three years next preceding the commencement of this suit; that both the plaintiff and defendants are residents of this county, and have been domiciled here for upwards of one year next preceding the commencement of this suit, and being further of opinion from the evidence filed in the case that the said defendant Dink Pugh since his marriage to the plaintiff, Flocine Pugh, has been guilty of adultery; and it not appearing that the plaintiff has condoned said offence by cohabiting with the said defendant since the occurrence of the said offence; ~~(and it further appearing that the plaintiff and the defendant now both reside in Nansemond county Virginia and have both been domiciled here in said county upwards of one year next preceding the commencement of this suit)~~ doth order adjudge and decree that the plaintiff be, and she is hereby granted a full and absolute divorce a vinculo matrimonii from her husband, the defendant, Dink Pugh; and that the marriage relations heretofore existing between them be, and the same are hereby wholly annulled and set aside; and that the ~~defendant~~ plaintiff recover of the defendant her cost in this cause by her expended; and nothing further remaining to be done in said cause, it is ordered that the same be stricken from the docket.

Depositions

1911 Oct. 6. Filed
- M. M. Watkins D. C.

IN THE CIRCUIT COURT OF NANSEMOND COUNTY:

Flocine Pugh

vs.

In Chancery.

Dink Pugh.

which has been regularly matured and set for hearing
This cause came on this day to be heard on the bill, and the depositions of George Lassiter, and other witnesses taken after due notice to the defendant, and the defendant, who has been served with notice, and who has been proceeded against in the manner required by law, failing to plead answer, or demurr, and was argued by counsel.

On consideration the court being of opinion that the defendant Dink Pugh has abandoned and deserted his wife, the plaintiff Flocine Pugh, for upwards of three years next preceding the commencement of this suit; that both the plaintiff and defendants are residents of this county, and have been domiciled here for upwards of one year next preceding the commencement of this suit, and being further of opinion from the evidence filed in the case that the said defendant Dink Pugh since his marriage to the plaintiff, Flocine Pugh, has been guilty of adultery; and it not appearing that the plaintiff has condoned said offence by cohabiting with the said defendant since the occurrence of the said offence; ~~(and it further appearing that the plaintiff and the defendant now both reside in Nansemond county Virginia and have both been domiciled here in said county upwards of one year next preceding the commencement of this suit)~~ doth order adjudge and decree that the plaintiff be, and she is hereby granted a full and absolute divorce a vinculo matrimonii from her husband, the defendant, Dink Pugh; and that the marriage relations heretofore existing between them be, and the same are hereby wholly annulled and set aside; and that the ~~defendant~~ plaintiff recover of the defendant her cost in this cause by her expended; and nothing further remaining to be done in said cause, it is ordered that the same be stricken from the docket.

Final Decree

Enter Octo. 11. 1911.

James M. Moore

Entered in Chancery
Order Book No. 4. Page 487.

TO THE HONORABLE JAMES L. MCLEMORE:

JUDGE OF THE CIRCUIT COURT OF NANSEMOND COUNTY:

Hughly complaining sheweth unto the court, your oratrix, Flocine Pugh, of Nansemond County, Virginia, the following case:

Your oratrix says that she was married to her present husband, Dink Pugh, in Nansemond County, Virginia, on the 11th day of December, 1906, as will more fully appear by reference to the marriage records duly recorded in the Clerk's Office of said County: Your oratrix further says that after said marriage she was at all times a loving, considerate, faithful and dutiful wife to her said husband, and did everything in her power during her married life to make his life a happy one, and to make his home a pleasant one; that she united with him in all his daily efforts for the purpose of earning a livelihood for them; that she was a day laborer by his side, and has striven hard to see that they both had a competence and that they both had all the necessities of life; she further says that her said husband did fairly well toward her for a year or so after their marriage, but soon became trifling, indolent, and altogether indifferent toward her; that this state of affairs went on until about the month of ~~July~~ ^{July} 1908, when her said husband without any just or sufficient or legal cause or excuse whatever, willfully abandoned and deserted her, and quit her and her house and home and bed and board, and that he has never since then at any time returned to recognize her as his wife or to live with her as such, nor has he at any time since said date contributed ⁱⁿ the least degree toward her support, maintenance or comfort, nor provided her with anything. She therefore charges that he has willfully abandoned and deserted her for upwards of three years next preceding the commencement of this suit. She further says that she and her said husband are both now domiciled in the county of Nansemond and State of Virginia and have both been so domiciled in the said county and state for one year next preceding the commencement of this suit, in fact ever since the time and date of her said marriage.

She further says that her said husband has been guilty of adultery since their said marriage ; that a certain unmarried female by the name of Arrie Artis has within the last two months given birth to child and that her said husband Dink Pugh is the father of the said child . She therefore further charges him with adultery since said marriage and says that she has not condoned said offence on his part by cohabiting with him since said act ; that in fact she has not known him carnally since his desertion of her in 1908 as aforesaid . She further says that she can no longer respect him as a husband and thinks she is entitled to an absolute divorce .

In tender consideration whereof and forasmuch as your oratrix is remediless in the premises, save by the aid of a court of equity, where such matters are alone and properly cognizable, your oratrix prays that the said Dink Pugh may be made a party defendant to this suit, and required to answer this bill, though an answer under oath is hereby waived; that proper process may issue; that all proper accounts and depositions may be taken, and that your oratrix may be granted a full and absolute divorce a vinculo matrimonii from her said husband, Dink Pugh; that he may be required to contribute such sums as are necessary to carry on this suit, and to pay her such sums as alimony as the court may decree, and for all such other further and general relief, as this case may require, or which to equity may seem meet, and she will ever pray, etc.

Florence Pugh

VIRGINIA, NANSEMOND COUNTY, to-wit:

I, R. H. Rawles, a Notary Public for the county aforesaid in the State of Virginia, whose term of office expires on the 3d day of February, 1915, do certify that Flocine Pugh whose name is signed to the foregoing bill, has this day personally appeared before me, in my county aforesaid, and being duly sworn made oath that the statments contained in the said bill as coming of her own knowledge are true, and that all other statements therein contained as coming from knowledge or information derived from others she believes to be true.

Given under my hand this-----day of September, 1911.

-----N. P.

Bill.

Pugh & Pugh.

R. H. RAWLES,
ATTORNEY - AT - LAW,
SUFFOLK, VA.

SUFFOLK HERALD--PRINTERS, PUBLISHERS, STATIONERS

1911- Sept 18- filed
M. M. Watkins D.C.

Florence Pugh

v. -

Dink Pugh

1911

Sept.

5 - Process issued returnable to second
September (1911) Rules - Executed -

Sept.

18 - Bill filed and Decree nisi

Oct.

2 - Decree nisi confirmed and
cause set for hearing -

Notes



Costs:

Tax	1.50
Clerk	3.50
Sheriff	.50
Atty	15.00
	\$20.50

R. H. Rawles, p. 9.

Florence Pugh
vs { Chancery -
Dink Pugh

1911 Octo. 11
Final Decree