

1920-010
Nansemond Co (Suffolk) Chancery Causes: H. R. Griffin vs Emilie C. Savage et al

Rowls, Copeland, Herrell

CHANCERY SUMMONS

THE COMMONWEALTH OF VIRGINIA,

TO THE SHERIFF OF NANSEMOND COUNTY—Greeting:

YOU ARE HEREBY COMMANDED TO SUMMON Emiline C. Savage, Robert R. Taylor, Administrator
of W.H. Savage, deceased, R.H. Rawles, Trustee and Mrs Mollie J. Copeland;
Margaret Rives Savage, Charles Taylor Savage, William Henry Savage,
Richard Weaver Savage and Robert Steele Savage, the last five being
infants.

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 April 1919, to answer a
Bill in Chancery, exhibited against them
in the said Court by H.R. Griffin, Complainant

and have then and there this summons.

WITNESS, G. E. BUNTING, Clerk of our said Court, at his office, this 15th day of

April, 1919, in the 143rd year of the Commonwealth.

~~A copy~~ Teste:

CLERK.

Teste:

CLERK.

Executed on the 18 day of
April 1919 within the county of
Nansemond, by delivering a
true copy of the within process,
in writing, to Mrs. Mollie
J. Cofeland in person
E. E. Wagner
Sheriff of Nansemond County,

Levin & Hawes P. q.

H. B. Guggen

vs. } In Chancery

Ernie C. Savage
et al.

1919

April Rules,

Shirley Monday.

NANSEMOND CIRCUIT COURT.

Process Book No.-----

Page-----

CHANCERY SUMMONS.

THE COMMONWEALTH OF VIRGINIA.

TO THE SHERIFF OF NANSEMOND COUNTY—GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON... Emilie C. Savage, Robert R. Taylor, Administrator of W.H. Savage, deceased, R.H. Rawles, Trustee and Mrs Mollie J. Copeland; Margaret Rives Savage, Charles Taylor Savage, William Henry Savage, ~~Richard~~ Weaver Savage and Robert Steele Savage, the last five being infants

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 ... April ... 1919, to answer ... Bill in Chancery, exhibited against ... them in the said Court by ... H.R. Griffin.

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this ... 15th ... April ... 1919, in the 134th year of the Commonwealth.

A copy—Teste:

Teste:

G. E. Bunting, Clerk.
By Ruby V. Bunting P.S.

G. E. Bunting, Clerk.
By Ruby V. Bunting P.S.

CHANCERY SUMMONS.

THE COMMONWEALTH OF VIRGINIA.

TO THE SHERIFF OF NANSEMOND COUNTY—GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON.... Willie C. Savage, Robert H. Taylor, Administrator of E. H. Savage, deceased, J. H. Davies, Executor and Mrs
Mollie J. Copeland; Margaret Ellen Savage, Charles Taylor Savage,
William Henry Savage, Rachel Weaver Savage and Robert Steele Savage, the
last five being infants.....

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... April... 1919, to answer... a... Bill in
Chancery, exhibited against... them.....
in the said Court by... W. H. Griffin,.....

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this... 15th... day of
April... 1919, in the 43rd... year of the Commonwealth.

A copy—Teste:

Teste:

G. E. Bunting, Clerk.
G. E. Bunting

G. E. Bunting, Clerk.
G. E. Bunting

Executed this.....day of....., 191... by delivering a true copy of the within process
to

in person, in the County of Nansemond, State of Virginia.

.....Sheriff.

....., p. q.

.....

vs. } In Chancery.

.....

1919...

Rules.

Monday.

NANSEMOND COUNTY COURT,

Process Book, No.....

Page.....

Due legal and sufficient service of the within summons
is hereby accepted.

Given under my hand this ^{21st} day of April, 1919.

William S. Holland
Guardian ad litem
for Margaret R. Dorsey, Charles Taylor
Dorsey, William Henry Dorsey,
Rachel Kearse Dorsey, and
Robert Stale Dorsey, infant
dependents
R. R. Reule, Clerk

CHANCERY SUMMONS

THE COMMONWEALTH OF VIRGINIA,

TO THE SHERIFF OF NANSEMOND COUNTY—Greeting:

YOU ARE HEREBY COMMANDED TO SUMMON Emilie C. Savage, Robert E. Taylor, Administrator
of W.H. Savage, deceased, R.H. Rawles, Trustee and Mrs Mollie J. Copeland;
Margaret Rives Savage, Charles Taylor Savage, William Henry Savage,
Rachel Weaver Savage and Robert Steele Savage, the last five being
infants.

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 April 1919, to answer a
Bill in Chancery exhibited against them
in the said Court by H.R. Griffin, Complainant

and have then and there this summons.

WITNESS, G. E. BUNTING, Clerk of our said Court, at his office, this 15th day of
April, 1919, in the 13th year of the Commonwealth.

A copy—Teste:

Teste:

CLERK.

CLERK.

G. E. Bunting
By Ruby N. Bunting

G. E. Bunting
By Ruby N. Bunting

Copy.
Lewis Harris P. Q.

H. R. Driggs

vs. } In Chancery

Emilie C. Savage
et al

1919

April

Rules,

Monday

Monday.

NANSEMOND CIRCUIT COURT.

Process Book No.-----

Page-----

Due legal and sufficient service of the within summons is hereby accepted.

Given under my hand this 16th day of April, 1919.

Mrs. Emilie C. Savage

To the Clerk of the Circuit Court of
Nansemond County, Virginia:

H. R. Griffin.....Complainant

vs. In Chancery

Emilie C. Savage, Robert R. Taylor,
Administrator of W. H. Savage, deceased,
R. H. Rawls, Trustee, and Mrs. Mollie J.
Copeland; Margaret Rives Savage, Charles
Taylor Savage, William Henry Savage,
Richard Weaver Savage and Robert Steele
Savage, the last five being infants.

Issue summons in Chancery to Second April rules, ~~1919~~.

(Third Monday), 1919.

Lewis & Harris

To the Clerk of the Circuit Court of
Nansemond County, Virginia:

You are hereby requested to appoint Mr. Wm S.
competent

Holland a discreet and (attorney at law) guardian ad litem

of Margaret Rives Savage, Charles Taylor Savage, William
Henry Savage, Richard Weaver Savage and Robert Steele Savage,
the infant defendants in the suit of H. R. Griffin vs. Emilie
C. Savage et als.

Lewis & Harris

#1803²⁶

Received from Robert R. Taylor,
Special Commissioner for sale of U.S. Survey
Land Eighteen Hundred Three and ²⁶/₁₀₀ Dollars.

Sept 20, 1919

Robert R. Taylor
Commissioner of U.S. Survey ^{cert.}

TERMS: CASH

Suffolk, Va., Aug 30 1919

M Robert, R. Taylor adms.
Gatesville va

Fire, Life, Marine, Accident, Health, Employers' Liability,
and Steam Boiler Insurance and Surety Bonds

P. O. BOX 103

OFFICE NO. 936 WASHINGTON STREET

BELL PHONE NO. 10

DATE	POLICY NO.	COMPANY	PROPERTY INSURED	AMOUNT	PREMIUM
July 9/14	1644377	Fed	All Cars at Criffin's Machine Shop	\$3000.	\$10.00
		Lent			
		Miles			

\$ 500.

On demand

after date, with legal interest from date

until paid, payable

from the date of the death of Cassandra Rawls

I

bind

my

self

heirs, executors and administrators, jointly and severally,

to pay to

Mollie J. Copeland

her

Heirs or Assigns,

the sum of

Five hundred and 94 x

DOLLARS,

100

for value received; and

hereby waive the benefit of

my

Homestead Exemption as to this

debt, obligation and contract.

Secured by deed of trust on real estate in

R H Rawls

Trustee.

Right reserved to my heirs and in fees

at Office of Mollie J.

Witness

my

hand

and seal

this

4th

day of

May

1912.

WITNESS:

R H Rawls

[Signature]

W. H. Savage

[SEAL]

[SEAL]

[SEAL]

This bond is to bear no interest until the
date of the death of Mrs. L. B. Harrison
Rauls, and then at the rate of six per cent.

For Value received, I hereby assign this
note to Robert R. Taylor, without recourse
to me. July 12, 1919

Witness +

~~Estelle Harris~~ Mollie J. Copeland

I hereby assign this note to H. L. A.

Harris - For Cancellation

July 12, 1919 Robert R. Taylor

71 - 340

83-44

VIRGINIA:

IN THE CIRCUIT COURT OF HANSEBOND COUNTY.

H. R. Griffin

VS.

Emilie C. Savage, Robert R. Taylor, Administrator of the Estate of W. H. Savage, deceased, R. H. Rawls, Trustee and Mrs. Mollie J. Copeland; Margaret Rives Savage; Charles Taylor Savage, William Henry Savage, Rachel Weaver Savage and Robert Steele Savage, the last five being infants.

IN CHANCERY

This case came on this day to be heard upon the Complainant's bill and the exhibit filed therewith; and thereupon the guardian ad litem filed the answer of the infant defendants, and his own answer on oath to the bill of the Complainant; and the adult defendants filed their own answer to the said bill; to which several answers the Complainant replied generally, and was argued by counsel.

On consideration whereof, it being clearly shown from the answers of all the defendants and the Exhibit filed with the bill, that the said H. R. Griffin is entitled to a good and sufficient grant and conveyance of the land in the bill mentioned-

The Court doth adjudge, order and decree that Robert R. Taylor
H. P. Lippard, who is hereby appointed-
Special Commissioner for that purpose, do collect from the
purchaser, the balance of the purchase price of the land,
namely; \$2300.00, together with interest thereon from December
24th, 1918, until paid, and upon collecting the same, the said

Commissioner is directed to make conveyance of the said land to the purchaser, H. R. Griffin, his heirs or assigns, by Special Warranty deed, and after satisfying the lien thereon, which is held by Mrs. Mollie J. Copeland, ^{and after paying} ~~and reserving the~~ sum of \$, as a fund from which the costs of this suit ^{turn over} ~~may be paid, is directed to pay~~ the balance of the purchase price then left in his hands to Robert R. Taylor,

Administrator of the Estate of W. H. Savage, deceased, after being satisfied that proper bond has been given.

But the said Commissioner shall have no power to execute this decree until he enters into bond, with sufficient security, in the Clerk's Office of this Court, payable to the Commonwealth of Virginia, in the penalty of \$2000, and conditioned for the faithful discharge of his duties hereunder,

H. R. Griffin

vs.

Emilie C. Savage.

Decree of Court.

Given May 12, 1917

J. M. Linn

Pharmacy order Book
No. 51 - Pg. 207

LEWIS & HARRIS
COUNSELLORS AT LAW
LAW BUILDING
SUFFOLK, VIRGINIA

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

H. R. Griffin

Vs.

In Chancery

Emilie C. Savage, Robert R. Taylor, Administrator of the Estate of W. H. Savage, deceased, R. H. Rawls, Trustee, and Mrs. Mollie J. Copeland; Margaret Rives Savage, Charles Taylor Savage, William Henry Savage, Rachel Weaver Savage and Robert Steele Savage, the last five being infants.

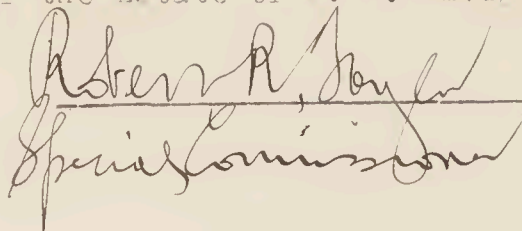
To the Honorable James L. McLemore, Judge of said Court:

Robert R. Taylor, Special Commissioner, appointed by a Decree entered in this cause on the day of , 1919, was directed to collect from H. R. Griffin, the Purchaser of the land fully set out and described in the Bill in this cause, the balance of the purchase price, together with interest due from December 24th, 1918 until paid, and upon collecting said purchase price to make conveyance of the land to the Purchaser. And after satisfying a lien thereon, held by Mrs. Mollie J. Copeland and paying the costs of this suit, was directed to turn over the balance of the said purchase price then remaining in his hands as Special Commissioner to Robert R. Taylor, Administrator of the Estate of W. H. Savage, deceased under appointment of this Court.

And the undersigned Special Commissioner, would respectfully report to the Court, that in accordance with the said Decree and after entering into bond with surety approved by the Clerk of this Court in the penalty of \$3000.00, as required by said Decree, he did collect from H. R. Griffin, the Purchaser, the purchase price of \$2300.00, together with the sum of \$72.30 interest thereon, the same being interest from the 24th day of December, 1918, to the 12th day of July, 1919, the date on which payment of the purchase price was made, and that, upon collecting

the said gross sum of \$2372.30, he conveyed the said land in the Bill in this proceeding mentioned, by Special Warranty deed, to the said H. R. Griffin.

That upon making conveyance as aforesaid, he satisfied the lien held by Mrs. Mollie J. Copeland, which, together with interest and Clerk's Fee for making the same satisfied, amounted to the sum of \$546.54, taking a receipt therefor from the said Mrs. Mollie J. Copeland, and paid to the Clerk of the Circuit Court of Nansemond County, Virginia, the sum of Ten (\$10.00) Dollars, for the payment of all costs now owing or which may accrue in this cause; and to West and Withers the sum of Ten (\$10.00) Dollars for premium on Commissioner's bond, and Two Dollars and Fifty Cents (\$2.50) for docket stamp affixed to the deed from your commissioner to the said H. R. Griffin, and the balance remaining in his hands, viz: \$1803.26, to Robert R. Taylor, Administrator of the Estate of W. H. Savage, deceased.


Special Commissioner

Report of Commissioner

H. R. Griffin

Vs.

Emilie C. Savage et als

1920. April 21st. filed
J.H.

LEWIS & HARRIS
COUNSELLORS AT LAW
LAW BUILDING
SUFFOLK, VIRGINIA

Lewis & Harris,
Suffolk, Va.

Dear Sirs,

My husband W. H. Savage
died Jan. 16, 1919.

Yours truly

Mrs. Emilie C. Savage

Whaleyville Va.

May 9, 1919.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

H. R. Griffin.....Complainant

Vs. In Chancery

Emilie C. Savage et als.....Defendants

This cause came on this day to be finally heard on the papers formerly read, and on the Report of Special Commissioner, Robert R. Taylor, this day filed by leave of Court, to which Report there is no exception, and was argued by counsel.

On consideration whereof, it appearing to the Court that the said Special Commissioner, Robert R. Taylor, has collected the purchase price of the said land sold in this suit, and described in detail in the Bill in these proceedings, and has conveyed the said land to the purchaser, H. R. Griffin, by Deed with Special Warranty; has paid the cost of this suit, and has paid
7 the balance of the proceeds arising from the said sale in accordance with the decree entered in this cause on the 12th day of May, 1919, all of said distributions being accompanied by proper vouchers, the Court doth ratify, approve and confirm the said report, and there being nothing remaining to be done in this suit, it is ordered that this cause be dismissed from the docket.

Virginia:
In the Circuit Court of Hanover
County -

J. R. Griffin

vs
Emilie C. Savage et al

Dinae Lacar

Enter April 21. 1920

Jas. L. McMore.

#12 pg. 260

LEWIS & HARRIS
COUNSELLORS AT LAW
LAW BUILDING
SUFFOLK, VIRGINIA

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

H. R. Griffin

V s.

Emilie C. Savage, Robert R. Taylor,)
Administrator of the Estate of W. H.)
Savage, deceased, R. H. Rawls,)q
Trustee and Mrs. Mollie J. Copeland;) IN CHANCERY
Margaret Rives Savage, Charles Taylor)
Savage, William Henry Savage, Rachel)
Weaver Savage and Robert Steele Savage,)
the last five being infants.)

The separate answer of Mrs. Emilie C. Savage, widow of W. H. Savage, deceased, to a bill of complaint filed against and others her/in the Circuit Court of Nansemond County, by H. R. Griffin.

This respondent reserving to herself the benefit of all just exceptions to the said bill of complaint for answer there-to, answers and says:

That she is the widow of W. H. Savage, deceased; that she believes the statements in said bill to be true; that her husband, the said W. H. Savage, deceased, did, on the 24th day of December, 1918, sell the piece or parcel of land mentioned in the said bill, to H. R. Griffin, the complainant in this suit, for the sum of \$2400.00, one hundred dollars of which was paid in cash and the balance was to be paid as soon as proper deed could be prepared and executed; that the said H. R. Griffin was put into possession of said land by the said W. H. Savage, ~~deceased~~; that the said W. H. Savage was taken sick with influenza a few days after selling said land to the said H. R. Griffin and died intestate on January 1919, before he had an opportunity to have prepared and executed, a proper deed for said property; that she sees no reason why the prayer of the bill should not be granted and that she concurs in the prayer of the said bill.

And now having fully answered the complainant's bill, this

respondent prays to be hence dismissed with her reasonable costs by her in this behalf expended.

+ Emilie C. Savage

STATE OF VIRGINIA:

County of Nansemond, to-wit:

Mrs. Emilie C. Savage, the respondent named in the foregoing answer, being duly sworn, says that the facts and allegations therein contained are true, except so far as they are therein stated to be on information; and that so far as they are therein stated to be upon information she believes them to be true.

+ Emilie C. Savage
Respondent

Taken, Sworn to and subscribed before me, J O Knight
_____, a Notary Public of and for the County and State
aforesaid, in my county aforesaid, this 9th day of May, 1919.

My commission expires the 6 day of July, 1921.

J O Knight
Notary Public.

H. R. Griffie
vs.
Emilie C. Savage
et als-

Answer of
Emilie C. Savage

Filed May 12, 1919
H. E. Ambrose
Clerk

LEWIS & HARRIS
COUNSELLORS AT LAW
LAW BUILDING
SUFFOLK, VIRGINIA

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

H. R. Griffin

Vs.

IN CHANCERY

Emilie C. Savage, Robert R. Taylor,
Administrator of the Estate of W. H.
Savage, deceased, R. H. Rawles,
Trustee, and Mrs. Mollie J. Copeland;
Margaret Rives Savage, Charles Taylor
Savage, William Henry Savage, Rachel
Weaver Savage and Robert Steele Savage,
the last five being infants.

The joint and separate answers of Mollie J. Copeland and R. H. Rawles, Trustee, to a bill in chancery exhibited against them and others by H. R. Griffin in the Circuit Court of Nansemond County.

Without waiving the benefit of all just exceptions which may be had or taken to the many errors and uncertainties in the said complainant's bill of complaint, for answer to said bill these defendants answer and say: It is true that on the 4th day of April, 1912, W. H. Savage and wife made and executed unto R. H. Rawles, Trustee, a certain deed of trust which is duly recorded in Deed Book 71, page 340, in the Clerk's Office of said county, to secure to the said Mollie J. Copeland the sum of FIVE HUNDRED DOLLARS (\$500.00), evidenced by a bond for that sum of even date with said deed of trust, payable on demand.

They further say that no part of the said bond or debt has been paid, but there is yet due thereon the principal sum of FIVE HUNDRED DOLLARS (\$500.00) together with interest from the 1st day of January, 1918, until paid, it being for

money loaned unto the said W. H. Savage by the said Mollie J. Copeland.

The said Mollie J. Copeland prays that no judgment, order or decree may be entered in said cause which will in any manner militate against her or jeopardize her debt as above set forth; she further prays that in the event a decree is made for the sale of the said real estate that her debt, together with all interest due thereon, may be paid in full to her, said debt being a first and prior lien on the real estate described in said deed of trust and mentioned in the bill in this cause.

She further prays that all her interest in the premises may be fully protected by the court, and that in the event an order or decree is entered for the conveyance or sale of said real estate that she may be paid what is due her in full.

The said R. H. Rawles, Trustee, says that in so far as he is informed, he believes all the above facts are true, and he joins in the prayer of this answer.

And having fully answered, these defendants pray to be hence dismissed with their reasonable costs by them in this behalf expended.

They will ever pray etc.

Mollie J. Copeland

R. H. Rawles
TRUSTEE.

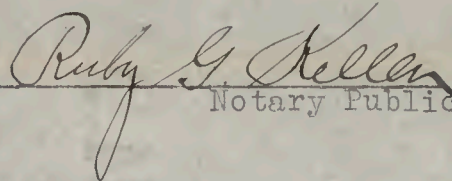
VIRGINIA,

To wit:

City of Suffolk,

I, Ruby G. Keller, a Notary Public for the city aforesaid, in the State of Virginia, do certify that Mollie J. Copeland, and R. H. Rawles, Trustee, whose names are signed to the foregoing answer, have this day personally appeared before me in my said city, and being duly sworn, made oath that the statements contained in the said answer, as coming of their own knowledge are true, and that all other statements therein contained, as coming from knowledge or information derived from others, they believe to be true.

Given under my hand this 26th day of April, 1919.


Notary Public.

My commission expires on the 2d day of October,
1921.

Answer of
Mollie J. Cepuland ad

Griffin to Savage.

Filed Apr 28. 1919

W. B. Montgomery
Clerk

Placed file in Paper
RNR

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

H. R. Griffin

Vs.

Emilie C. Savage, Robert R. Taylor,
Administrator of the Estate of W. H.
Savage, deceased, R. H. Rawls, Trustee,
and Mrs. Mollie J. Copeland;
Margaret Rives Savage, Charles Taylor
Savage, William Henry Savage, Rachel
Weaver Savage and Robert Steele Savage,
the last five being infants.

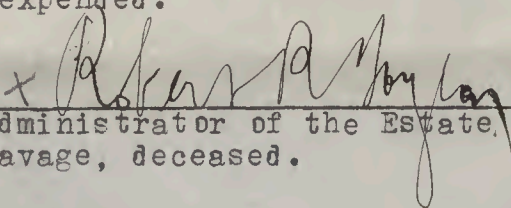
)
)
)
) IN CHANCERY
)
)
)

The separate answer of Robert R. Taylor, Administrator of the Estate of W. H. Savage, deceased, to a bill of Complaint filed against him and others in the Circuit Court of Nansemond County, by H. R. Griffin.

This respondent reserving to himself the benefit of all just exceptions to the said bill of complaint, for answer thereto, answers and says:

That he is the Administrator of the Estate of W. H. Savage, deceased; that he believes the statements in said bill of complaint to be true; that he sees no reason why the prayer of the bill should not be granted; that he concurs in the prayer of said bill.

And now having fully answered the Complainant's bill, this respondent prays to be hence dismissed with his reasonable costs by him in this behalf expended.

x 
Administrator of the Estate of W. H.
Savage, deceased.

STATE OF NORTH CAROLINA,

Gates County, to-wit:

Robert R. Taylor, the respondent named in the foregoing answer, being duly sworn, says that the facts and allegations therein contained are true, except so far as they are therein stated to be on information; and that so far as they are therein stated to be upon the information he believes them to be true.

Robert R. Taylor
Respondent.

Taken, Sworn to and subscribed before me, W. M. L. L. L.,
a Notary Public of and for the County and State aforesaid, in
my County aforesaid, this 9th day of May, 1919.

My commission expires the 27th day of May, 1919.

W. M. L. L. L.
Notary Public.

H. R. Griffin

vs.

Emilie C. Savage
et al.

Answer of
Robert R. Taylor

Filed May 15, 1911
G. E. Griffin,
Clerk

LEWIS & HARRIS
COUNSELLORS AT LAW
LAW BUILDING
SUFFOLK, VIRGINIA

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

H. R. Griffin

VS.

Emilie C. Savage, Robert R. Taylor, Administrator of the Estate of W. H. Savage, deceased, R. H. Rawls, Trustee, and Mrs. Mollie J. Copeland; Margaret Rives Savage, Charles Taylor Savage, William Henry Savage, Rachel Weaver Savage and Robert Steele Savage, the last five being infants.

IN CHANCERY

The Answer of Infant Defendants by Guardian Ad Litem
and of Guardian Ad Litem.

The answer of Margaret Rives Savage, Charles Taylor Savage, Willaim Henry Savage, Rachel Weaver Savage and Robert Steele Savage, infants under the age of twenty-one years, by William S. Holland (a discreet and competent attorney at law,) their guardian ad litem assigned to defend them in this suit, and the answer of the said William S. Holland, guardian ad litem of the said infant defendants, to a bill of complaint exhibited against the said infant defendants and others by H. R. Griffin in the Circuit Court of Nansemond County, Virginia.

For answer to the said bill the said infant defendants by their guardian ad litem answer and say that being of tender years they do not know what their true interests are in relation to the subject-matter of the said bill, nor do they know whether the statements therein contained are true or not. They confide the protection of their interests therein to the care of the court. And the said guardian ad litem of the said infant defendants for answer to the said bill answers and says that he knows nothing as to the truth or falsity of the statements in the bill contained. He prays full protection for the infant defendants. And now, having fully answered, these defendants

pray to be hence dismissed, with their costs, etc.

By William S. Holland
Guardian ad litem

Margaret Rives Savage,
Charles Taylor Savage,
William Henry Savage,
Rachel Weaver Savage and
Robert Steele Savage.

William S. Holland, Guardian ad Litem of the
Said Infants.

STATE OF VIRGINIA,

County of Nansemond) ss.

Sworn to before me in my County aforesaid by William S.
Holland, guardian ad litem as aforesaid, this the ¹² day of
May A.D. 1919.

St. Lawrence N.P.

*My Commission expires Oct. 11-
1919*

H. R. Gissin
v. Chanary

Emili C. Savage et al.

Answer of Guardian
ad litem

~~Filed~~ *May 13, 1919*

G. E. Pembrey
Atty

LEWIS & HARRIS
COUNSELLORS AT LAW
LAW BUILDING
SUFFOLK, VIRGINIA

Exhibit A

Dec. 24 1918

Received from
H. R. Chippin

One hundred Dollars
\$100.00

Part payment on farm
Balance \$2,300.00
H. R. Savage \$100.00

VIRGINIA:

In the Circuit Court of Nansemond County.

H. R. Griffin

v. In Chancery

Emilie C. Savage, Robert R. Taylor, Administrator of the Estate of W. H. Savage, deceased, R. H. Rawls, Trustee, and Mrs. Mollie J. Copeland; Margaret Rives Savage, Charles Taylor Savage, William Henry Savage, Rachel Weaver Savage and Robert Steele Savage, the last five being infants.

To the Honorable James L. McLemore, Judge of said Court.

Your complainant, H. R. Griffin, respectfully represents:

1. That on the 24th day of December, 1918, W. H. Savage was seised and possessed in fee simple, subject to a certain deed of trust executed on the 4th day of April, 1912, and duly recorded in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, on the 4th day of April, 1912, in Deed Book No.71, at Page 34, to R. H. Rawls, Trustee, to secure to - Mrs. Mollie J. Copeland of Nansemond County, Virginia, the payment of the sum of Five Hundred (\$500.00) Dollars, evidenced by a bond for that sum, payable on demand, with legal interest from the date of the death of Cassandra Rawls until paid, of all that certain tract of land, with the buildings thereon, lying and being in the County of Nansemond, Virginia, and described in a certain deed from Mollie J. Copeland et als, to W.H. Savage, bearing date the 4th day of May, 1912, and recorded in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, in Deed Book No.72, at Page 292, as follows:

First. "All that certain tract or parcel of land situated in Cypress Magisterial District in the County of Nansemond, and the State of Virginia, about two (2) miles from Liberty Spring, containing One Hundred acres, more or less, and bounded and described as follows:

Beginning at a black gum, a point on the land formerly

belonging to Edwin Duke, and adjoining the lands formerly belonging to David Turlington, now Charles W. Byrd; the land of Jerry Wiggins, formerly, now R. T. Rawls estate; the land of Jackson Brinkley, formerly, now L. P. Brinkley Estate, and the lands formerly belonging to Jacob Duke, now William Rawls and being the same tract of land that was conveyed to William Rawls, Jr., by William Rawls, Sr., by deed dated the first day of June, 1842, and recorded in Old D.B. No. 39, page 288, in the Clerk's Office of Nansemond County, Virginia, which said book was destroyed by fire when the said Clerk's Office was destroyed in 1866.

Second: All that certain other tract or parcel of land, situated in Cypress District in the County of Nansemond and State of Virginia, containing seven and one-half (7-1/2) acres, more or less, and bounded and described as follows:

Beginning at a black gum and running to a black gum, a new corner, and bounded by the lands of Robert M. Harrell; and on the East by the land of the said Robert M. Harrell, South by the other land formerly belonging to William Rawls and West by the lands of Dempsey Reid, formerly, and being the same land that was conveyed to William Rawls by Robert M. Harrell, by deed dated the 1st day of October, 1886, and recorded in D.B. No. 17, page 159, in said Clerk's Office.

The two above tracts of land now forming one, and the said William Rawls has departed this life leaving his will duly recorded in Will Book No. 7, Page 53, in the said Clerk's Office on the 7th day of December, 1909, by which said last will the said William Rawls devised the said land to his daughters Mollie J. Rawls and Margaret R. Savage, and the said Mollie J. Rawls having since that time married the said John R. Copeland, The said land is sold subject to the dower right of Mrs. Cassandra Rawls, the widow of the said William Rawls, deceased."

2. That on the said 24th day of December, 1918, your complainant purchased of the said W. H. Savage the said tract of land with the buildings thereon situated as aforesaid, for the sum of \$2400.00.

3. That your complainant paid the said W. H. Savage, the sum of One Hundred (\$100.00) Dollars, part of the aforesaid sum, as will be shown by a receipt herewith filed, marked "Exhibit A", and made a part of this bill, and was placed in possession of the said farm by the said W. H. Savage on the 26th day of December, 1918.

4. That although notified by your complainant that he was ready to comply with the contract, the said W. H. Savage delayed executing a deed to your complainant, and afterwards departed this life intestate, on or about January 10th, 1919, and before executing a deed to your complainant.

5. That your complainant has been and is now ready and willing to perform his part of the contract by making payment of the balance due on the purchase price of the said land, and desires to secure a deed for the said property.

6. That the said W. H. Savage left surviving him as his heirs and distributees, the following persons, viz: Emilie C. Savage, his wife, Margaret Rives Savage, Charles Taylor Savage, William Henry Savage, Richard Weaver Savage and Robert Steele Savage, infant children.

7. That Robert R. Taylor has qualified as administrator of the said W. H. Savage and has given bond as the law directs.

Your complainant hereby offers to fully perform his part of the said contract with the said W. H. Savage and is ready and willing to bring the balance due by him for payment for said land into court for the benefit of the rightful claimant thereof upon the delivery to him or his assigns of a good and sufficient deed in fee simple for the said real estate.

In Consideration Whereof and forasmuch as your com-

plainant is remediless in the premises save in a court of equity he prays that the heirs, distributees and administrator of the said W. H. Savage, R. H. Rawls, Trustee, and Mrs. Mollie J.- Copeland, beneficiary in the aforesaid deed of trust, and all other parties in interest may be made defendants to this bill and required, but not under oath, to answer same, oath being hereby waived; That the said heirs, distributees and administrator may be compelled on their part to perform and comply with the undertakings and provisions of the said contract on the part of the said W. H. Savage, now deceased; That a proper deed for the real estate may be delivered to the said complainant; That all proper allowances and counsel fee may be made in this suit; That all proper inquiries may be directed and orders entered; And that your complainant may have such further and other and general relief in the premises as the nature of his case may require, as to equity may seem mete. *eo.*

And Your Complainant will ever pray, *eo.*

W R Griffin

Lewis Harris
Counsel.

STATE OF VIRGINIA:

City of Suffolk, to-wit:

This day H.R. Griffin, complainant in the foregoing bill, personally appeared before the undersigned, a ^{Notary Public} ~~Commissioner~~ ^{in the} ~~in the~~ for the City of Suffolk, State of Virginia, and made oath that the said bill is true to the best of his knowledge and belief.

Given under my hand this ~~14~~ ¹⁵ day of April, 1919.

my commission expires
January 16-1922

C. L. Lewis ^{Notary Public}
~~Commissioner in Chancery for the Circuit~~
~~Court of the City of Suffolk, Virginia.~~

H. K. Gussner

vs.

Emilie C. Savage et al

Filed April 21st 1912

Ruby V. Benton P. S.

G. A. HARRIS

ATTORNEY AND COUNSELLOR AT LAW

SUFFOLK, VIRGINIA