

1921-009
Nansemond Co (Suffolk) Chancery Causes: Edward W Brown vs Ernestine Mason Brown

Mason, Collins, Goodman, Powell

HUGH L. HOLLAND
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

July 1st, 1921.

Mr. G. E. Bunting; - Clerk,
City.

Dear Mr. Bunting:-

IN RE: EDWARD W. BROWN VS. ERNESTINE
MASON BROWN:

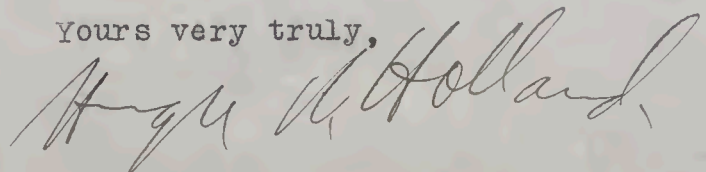
I hand you herewith memorandum, notice
of taking depositions in two copies and bill of complaint.

The defendant, Ernestine Mason Brown,
is a colored woman residing at 928 Jefferson Street, Norfolk,
Virginia. Please forward process and also notice of taking
depositions to the sergeant of the City of Norfolk, Virginia,
requesting him to serve the defendant at the address above
given, and to let you have the original of the process and
notice of taking depositions back with his returns. Please
send him your check for his fees, charging same to the cost
of this suit. Please let me know when you have received
these papers back with the officer's returns.

I enclose you my check for \$10.00 to
cover writ tax and deposit in this suit, of which kindly
acknowledge receipt.

Thanking you in advance for your at-
tention to this matter, I am, with kind regards,

Yours very truly,



HLH:B

ENC.

IN THE CIRCUIT COURT OF THE COUNTY OF NANSEMOND, VIRGINIA:

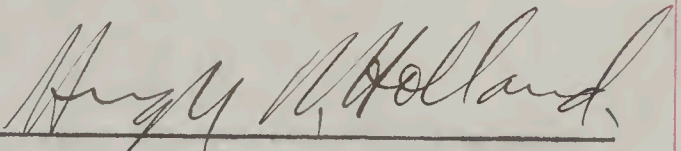
EDWARD W. BROWN.....COMPLAINANT

vs.....MEMORANDUM

ERNESTINE MASON BROWN.....DEFENDANT

To Clerk of said Court:

Please summon defendant for complainant to Second
July Rules (1921), in Chancery.



p. q.

Rule Notes:

July 5, 1921, process issued, returnable to July Rules, 3rd Monday, 1921

*July Rules 3rd Monday, 1921, process returned
served this filed & return nisi.
July Rules 3rd Monday, 1921, case set
for hearing.
W. G. Holland, Clerk*

EDWARD W. BROWN.....COMPLAINANT

vs. MEMORANDUM

ERNESTINE MASON BROWN

[Faint handwritten notes, possibly bleed-through from the reverse side of the page]

CHANCERY SUMMONS.

THE COMMONWEALTH OF VIRGINIA.

Segeant of the City of Norfolk
TO THE SHERIFF OF NANSEMOND COUNTY—GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON Prnestano Mason Brown

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 July, 1921, to answer a Bill in Chancery, exhibited against her in the said Court by Edward W. Brown

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this 5th day of July, 1921, in the 136th year of the Commonwealth.

A copy—Teste:

G. E. Bunting, Clerk.

Teste:

G. E. Bunting, Clerk.

ORIGINAL

Hugh L. Holland, p. q.

Edward W. Brown

vs. } In Chancery.

Ernestine Mason Brown

19.....

Rules.

Monday.

NANSEMOND COUNTY COURT,

Process Book, No.....

Page.....

Sheriff.

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.

8 July 21
serving a copy hereon on
Ernestine Mason Brown

Wm Starnes
Sect. City of Norfolk, Va.
Wm Halland



MARRIAGE LICENSE



Virginia City of Suffolk, to-wit:

To Any Person Licensed to Celebrate Marriages:

You are hereby authorized to join together in the Holy State of Matrimony, according to the rites and ceremonies of your Church or religious denomination; and the laws of the Commonwealth of Virginia,

Edward W. Brown, and Earstine Mason,

Given under my hand, as Clerk of Circuit Court of Suffolk, (County or City) this 21st day of September, 1912,

W.T. Johnson, Clerk.
By G.A. Harris, D.C.

MARRIAGE CERTIFICATE

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

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

Date of Marriage September 22, 1912 Place of Marriage Whales, Va.

FULL NAMES OF PARTIES.

Edward W. Brown, and Earstine Mason,

Age of Husband 23 years; Condition (single, widowed or divorced) Single,

Age of Wife 22 years; Condition (single, widowed or divorced) Single,

Race (White or Colored) Colored

Husband's Place of Birth Suffolk, Va. Full Mailing Address Suffolk, Va.

Wife's Place of Birth Norfolk, Va. Full Mailing Address Suffolk, Va.

Names of Parents { Husband Berry Brown, and Eliza his wife,
Wife Margaret Mason, and -----

Occupation of Husband Carpenter,

Given under my hand this 21st day of September, 1912,
W.T. Johnson, Clerk.
By G.A. Harris, D.C.

Certificate of Time and Place of Marriage

I, J.T. Jones, a Minister of the Christian

Church, or religious order of that name, do certify that on the 22nd day of Sep, 1912,

at Whales, Va., Virginia, under authority of the above License, I ^{united in Marriage} joined together in the Holy State of Matrimony the persons named and described therein. I qualified and gave bond according to law authorizing me to celebrate

the rites of marriage in the County (or City) of _____, State of Virginia.

Given under my hand this 25 day of Sep, 1912

J.T. Jones, (Person who performs ceremony sign here.)

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

I Chas. L. Hutchins, Clerk of the Circuit Court of the County of Suffolk, Virginia, the same being a Court of Record, do hereby certify that the foregoing is a true and correct copy as appears of record in my office, in book, 1, page, 22 of Marriage Register.

Given under my hand at my office in the City of Suffolk, Virginia, this 23rd day of June, 1921.

Chas. L. Hutchins
Clerk of the Circuit Court of the City
of Suffolk, Virginia.

#54
County (or City) *Suffolk*

Edward W Brown
Husband

and } Marriage License
Carstine Mason
Wife

Date of Issue *Sept. 21st 1912*

Marriage Register No. *1* Page *22*

The depositions of Samuel Collins and others, taken before me, C. L. Lewis, a Notary Public, in and for the City of Suffolk, State of Virginia, on the 28th day of July, 1921, between the hours of 10 A. M. and 5 P. M. of that day, pursuant to due notice to defendant served in person as shown by annexed notice, to be read as evidence on behalf of the complainant in a certain suit in equity, wherein Edward W. Brown is the complainant and Ernestine Mason Brown is defendant.

PRESENT:

HUGH L. HOLLAND, counsel for complainant.

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

SAMUEL COLLINS, being duly sworn, deposes

as follows:-

Q Please state your name, age, residence and occupation.

A Name, Samuel Collins, age, 33, I live at 200 Lee Street, Suffolk, Virginia, and I am a carpenter by trade and when I can't get any carpenter work to do, I do other work by the day, hauling and different things.

Q Please state whether you know Edward W. Brown and Ernestine Mason Brown, and if so, how long you have known each of them.

A I been knowing Edward Brown all my life, we was play children together and I have been acquainted with his wife, Ernestine Brown since their marriage, I have known her about nine or ten years.

Q About how far did you live from them when they were living together as husband and wife in Philadelphia Suburbs, Hansemond County, near Suffolk, Virginia.

A About a half- mile, it might a been a little farther but not much.

Q Please state how well you are acquainted with them.

A I am very well acquainted with them, they used to be over to my house most any time, Edward and his wife would come over to see I and my wife real often, sometimes three or four times a week and I and my wife visited with them just about as much as they did us, we was the best kind of friends, his wife was a warm friend of my wife, we seen a heap of each other, lot of times, we four, him and his wife and I and my wife would go fishing and after we caught some fish we would make a fire and cook the fish and set down and eat supper and talk a while and then come home, we had some good times together.

Q Please state whether Edward W. Brown and his wife, Ernestine

Mason Brown are living together now.

A No, sir, they are not.

Q Which one left the other and when.

A Ernestine left Edward in March, 1918.

Q Have they lived together as husband and wife since that time.

A No, sir.

Q Please state whether she had any cause for leaving, as far as you know, and also please state the circumstances of her leaving.

A I don't know of any cause in this world that she had for leaving, she did not have any cause to leave Edward for he was certainly good to her. A short while before she left Edward she was at my house and she told me that she was tired of living with her husband and that she wanted to go away and do like single girls and not be tied down, and have a good time and go around with different ones. She told me and my wife over and over that she was tired of married life and that she was going to leave her husband. We tried to put some sense in her head and reason with her, and persuade her not to leave, my wife thought a heap of Ernestine and I and my wife hated to see her leave her husband when she had such a good one. After she left her husband I saw her several times, she visited at our house for several days before she left for Norfolk. I asked her why she left Edward and she told me and my wife that she was tired of being married and that she won't going back to her husband, we tried to get her to go back, but she would not listen to anything we said, she said that she was never going back to him, that she had made up her mind to that, she told us that we was just losing breath talking to her about going back to Edward, for she won't ever

going back to him as long as she lived. After she left him, Edward come over to my house and asked me and my wife to talk to Ernestine and try to get her to come back to him. We told him that we had talked to her but that it did not seem to do no good. While Ernestine was visiting us just before she left for Norfolk Edward come over there and had a long talk with her and tried to get her to go home with him but she would not do it. I saw her after she left our house and had gone to Norfolk and I asked her when was she coming back home and live with her husband again, I told her that he wanted her to come back and would take her back if she would come, and she says to me: "I aint never coming back no more" she said that she was getting along fine down there in Norfolk and was having a good time going around with single girls and that she did not care if she never saw Edward again.

Q Please state what kind of a husband Edward W. Brown made his wife, Ernestine Mason Brown, as far as you know.

A He couldn't made her a better one than he did. He done everything in this world he could for her, he was a mighty kind and good husband to Ernestine, he had a nice good home, which belonged to him, he give her nice things to wear, and took good care of her, for he worked hard and made a good living.

Q Where does Edward W. Brown live now and how long has he been living there.

A He lives in Philadelphia Suburbs, Nansemond County, near Suffolk, Virginia, and he's been living there ever since I first knew him which is all of his life.

Q Where does Ernestine Mason Brown live now.

A

-4-

A She lives in Norfolk, Virginia,

Q Where were Edward W. Brown and Ernestine Mason Brown, his wife, living at the time she left him.

A. In Philadelphia Suburbs, Nansemond County, near Suffolk, Virginia.

And further this deponent saith not.

Samuel Collins

Cater Goodman, being duly sworn, deposes as follows:

Q Please state your name, age, residence and occupation.

A Cater Goodman, age 48, I live in Philadelphia Suburbs, Nansemond County, near Suffolk, Virginia, I am a day laborer.

Q Please state whether you know Edward W. Brown and Ernestine Mason Brown, and if so, how long you have known each of them.

A Yes, I know them, I have known Edward Brown since he was two years old, and I have known Ernestine Mason Brown between ten and eleven years, I knew her a year or so before they were married.

Q About how far did you live from them when they were living together as husband and wife in Philadelphia Suburbs, Nansemond County, near Suffolk, Virginia.

A I lived about four hundred (400) yards from their house.

Q Please state how well you are acquainted with them.

A I am just as well acquainted with Edward Brown as I am myself, I used to see them and have something to say to them every day of my life, I passed right by their house every day, they was good friends and neighbors of mine, they was to my house often and I and him have been the best of friends all of our lives, before he was married and after they was married, I liked them both fine, his wife and my wife was good friends, they used to visit and come to see each other, I liked them as well, and better than most of our neighbors.

Q Please state whether they are living together now.

A No, sir, they are not.

Q Which one left the other and when.

A Edward's wife left him in March, 1918.

Q Have they lived together as husband and wife since that time.

A No, they have not.

Q Please state the circumstances of her leaving and whether she had any cause to leave.

A No, sir, she did not have any cause at all to leave, she told me one day when I was over at their house that she was getting tired of married life and that she was going to leave, she said that she was dissatisfied, she said that she did not like married life and was tired of it. I asked her what was the matter, I told her that I would not think of leaving if I had as good a husband as she did and was getting along as well as she was, in reply, she says to me, that she won't satisfied, and she kept on saying that she was tired of married life and wanted to leave and get away. She told me flat out that she was going to leave Edward, She said : " My mind is made up and I am going", she told me about a week before she left that she was going away, she had had it in her mind to leave sometime before she really left, for she had been saying that she was going away. Me and my wife tried to get the notion outen her head, but she had made up her mind and set her head on going. I saw her after she had left her husband and I asked her if she was going back to her husband and she said "No, I aint", she said that she was tired of married life and that she won't ever going back to Edward. She said that she was going back to the house and get her furniture and some other things that were hers but that she won't ever going back to live with her husband any more. She wanted to go away and go around and live like a single person, she said that she was tired of her home, her husband, and she was through with married life, she really did not know what a easy time she was having, she was

living a heap better most single people, she did not have to work except look after her home, she had nice clothes, furniture for her house, good things to eat, and Edward was good to her, the whole truth of the matter was, she was tired of living with Edward and wanted to get away and be free to go around with young people and have a good time.

Q Please state what kind of a husband Edward W. Brown made his wife, Ernestine Mason Brown, as far as you know.

A He made his wife a mighty good husband, he owned his own home, he did not have any house rent to pay, he give his wife money to spend, she always had nice clothes to wear, and I would consider that she was getting along fine, her husband was a hard working man, he looked out for the interest of his home, he kept things around his house fixed up in good shape.

Q Where does Edward W. Brown live now and for how long.

A He lives in Philadelphia Suburbs, Nansemond County, near Suffolk, Virginia, and he's been living there for the last 34 or 35 years, which is all of his life.

Q Where does Ernestine Mason Brown live now.

A I don't know for sure, but I have heard that she is in Norfolk somewheres.

Q Where were Edward/Brown and Ernestine Mason Brown, his wife, living at the time they separated.

A In Philadelphia Suburbs, Nansemond County, near Suffolk, Virginia.

And further this deponent saith not.

Witness:
P. L. Lewis

Calder X Gosman
his
mark

Edward W. Brown being duly sworn deposes as follows:

Q. Please state your name, age, residence and occupation.

A Edward W. Brown, age 35, I live in Philadelphia Suburbs, in Nansemond County, near Suffolk, Virginia, and I am a carpenter by trade.

Q Please state whether you are the complainant in this suit.

A Yes, sir, I am.

Q Please state whether you and your wife, Ernestine Mason Brown are living together now.

A No, we are not.

Q Which one left the other and when.

A My wife left me in March, 1918.

Q Will you please state the circumstances of her leaving and whether you gave her any cause to leave.

A No, sir, she had no cause at all to leave, any of my neighbors will tell you how I treated my wife, she had no cause to go except that she just wanted to go. For sometime before she took up and left she had it made up in her mind to leave me, for she had told me several times that she was tired of married life and had said that she was going away and every time I would begin to talk about something else and try to get her mind off of the idea. About a week before she left me, she come right out and said that she was tired of married life and she was going to leave and that it won't no use to try to keep her from going for she had set her head to it, and she won't never coming back no more. I talked and talked and tried to prevail with her and persuade with her not to go, but it didn't do no good, the more I talked the more she seemed bent on going, she said she had set her head on going and she went in spite of everything I said. Soon after she left I saw her, I went over where she was staying and asked her to come back home and she said no, I am not coming back any more, she said that she never expected to live with me

again, that she was tired of married life anyhow and she wanted to live and go around like a single person. One night before I come home she packed up all of her clothes in her trunk and had her trunk carried over to a neighbor's house, Laura Yates, She done this while I was away, before I come home, and ^{when} I come home that night she was gone. I saw her the next day and begged and pleaded with her to come back home with me, but she refused and said 'no, I am not going to do it', she kept saying that she was tired of married life and she wanted to get away from it and be like a single person and go around and not be tied down, she said that she won't coming back and live with me no more, she said that she was tired of it, I provided for her the very best I could, she did not have to work hard, she did not have to do a thing except look after our home, she had a easy time compared with a heap of other married women, I had a nice home for her and always had plenty to eat, there was a store near our house and she went there and got what she wanted to eat I paid the bills and never said a word about how much she bought. She had nice clothes to dress in, and we had some real nice furniture in our house and other things around the house, I raised chickens and pigs to eat. I worked hard and done all I could to have a nice quiet and peaceable home and I tried to satisfy my wife, but when she made up her mind to leave I could not do a thing with her, she had set her head to going, lots of our friends talked to her but it won't no use, she would not listen to nobody.

Q Where does Ernestine Mason Brown live now.

A I don't know, but I have ^{heard} that she is in Norfolk somewheres, she may be there or she may be somewheres else, I have not seen her since a short while after she left me.

Q Have you and your wife, Ernestine Mason Brown lived together as husband and wife since she left you in March, 1918.

A No, sir, we have not.

Q Where were you and your wife, Ernestine Mason Brown living at the time she left you.

A We were living in Philadelphia Suburbs, in Nansemond County, near Suffolk, Virginia.

And further this deponent saith not.

Edward J. Brown

L. G. POWELL, being duly sworn, deposes as follows:

Q Please state your name, age, residence and occupation.

A My name is L. G. Powell, I am 56 years old, I lives in Philadelphia Suburbs, Nansemond County, near Suffolk, Virginia, and my occupation is a merchant.

Q Please state whether you know Edward W. Brown and Ernestine Mason Brown, and if so, how long you have known each of them.

A I know them very well indeed, I have been knowing Edward Brown ever since he was a child, and I have known his wife, Ernestine Brown since their marriage, which was about nine years ago.

Q When they ^{were} living together as husband and wife in Philadelphia Suburbs, Nansemond County, near the City of Suffolk, Virginia, please state about how far did you live from them.

A I lived just about one hundred and fifty (150) yards from them.

Q Please state how well you are acquainted with them.

A I knowed them pretty well sir, as I just told you, I have known Edward Brown all of his life ever since he was a child, and I become acquainted with his wife after he and she was married. You see I runs a store over there and I used to see him or her and mostly both of them every single day, and sometimes I would see them several times a day, yes, sir, I knowed them right smarten well, they would come to my store most any time, they lived right there near, and I used to see them off and on all day coming or going, his wife run an account at my store, and they did most all of their store trading at my store, and I used to see them on sundays too, we was mighty good friends and I looked on them as some of my best neighbors while they was living there together.

Q Please state whether they are living together now.

A No, sir, they are not.

Q Please state which one left the other and when.

A She left him, yes, Miss Ernestine left her husband in March, 1918.

Q Have they lived together as husband and wife since that time.

A No, they have not sir.

Q Please state the circumstances of her leaving and whether she had any cause to leave.

A As to her having any cause to leave, she certainly did not have any so far as I could and tell, I know the very day she left, she just went off on her own hook, for she had a husband that was mighty good to her and I am sure that she had no cause to go off and leave him except that she just wanted to go and did not want to live with him no more. He dressed her nice and did everything in this world he could for her, I know, for they traded right there at my store, she did not have to work, she worked when she wanted to and when she did not want to she could set down and rest and he never said a word to her, she just got tired of him and did not want to stay with him no more, she won't ever git nair nuther one that will be as good to her as Edward was I don't think, he took mighty good care of her. and she did not have no cause to leave, she just wanted to get away, she had made up her mind to leave and was set on going, her husband tried to persuade her not to leave him but she would go anyhow. I think she was very foolish to leave her husband, good as he was to her, she lived a heap better than a heap of wives, I mean she had more things in her house, and nice things to wear and money to spend and she always had a plenty of nice things to cook and eat.

Q Please state what kind of a husband Edward W. Brown made his wife, Ernestine Mason Brown, as far as you know.

A He made her a extra fine husband, he give her everything he could, he had a nice comfortable home, he took a heap of pride in his home and tried to have things nice around it, he was a good provider and was a nice good smart man and was a hard worker and saved his money, he did not throw his money away he always had a dollar.

Q Where does Edward W. Brown live now and how long has he lived there.

A He lives in Philadelphia Suburbs, Nansemond County, near the City of Suffolk, Virginia, and he's been living there all of his life.

Q Where does Ernestine Mason Brown live now.

A I don't know.

Q Where were Edward W. Brown and Ernestine Mason Brown, his wife living at the time they separated.

A Over there in Philadelphia Suburbs, Nansemond County, near Suffolk, Virginia.


And further this deponent saith not.

J. G. Powell

STATE OF VIRGINIA, COUNTY OF NANSEMOND.....TO-WIT:

I, C. L. Lewis, a Notary Public in and for the City of Suffolk, State of Virginia, do certify that the foregoing depositions of Samuel Collins and others were duly taken, sworn to and subscribed before me at the office of Hugh L. Holland, in the City of Suffolk, State of Virginia, on the 28th day of July, 1921, between the hours of 10 A. M. and 5 P. M. of that day to be read as evidence on behalf of the plaintiff in a certain suit in equity depending in the said Court wherein Edward W. Brown is complainant and Ernestine Mason Brown is defendant.

Given under my hand this 28th day of July, 1921.



Notary Public.

My commission expires on the 16th day of January 1922

EDWARD W. BROWN...COMPLAINANT

VS. DEPOSITIONS

ERNESTINE MASON BROWN...

DEFENDANT.

HUGH L. HOLLAND
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

EDWARD W. BROWN.....COMPLAINANT.

vs.....DECREE

ERNESTINE MASON BROWN.....DEFENDANT.

This cause came on this day to be heard on the Bill of Complaint and the depositions of the witnesses, taken after due and legal notice to the defendant, as required by law, and the defendant who appears to have been served with process in the manner prescribed by law, failing to plead, answer, or demur and was argued by counsel.

On consideration whereof it appearing to the Court from the evidence submitted in this cause that the said defendant, Ernestine Mason Brown, since her marriage with the plaintiff has deserted him for a period of more than three years, that the complainant has resided and has been domiciled in the State of Virginia for more than twelve months next preceding the commencement of this suit, and that the complainant and defendant last cohabited in the County of Nansemond, Virginia, the Court doth adjudge, order and decree that the complainant be, and he is hereby granted a divorce a vinculo matrimonii, from the said defendant, and that the marriage heretofore solemnized be, and the same is hereby annulled and set aside, and it appearing that nothing further remains to be done in this cause, it is ordered to be stricken from the docket.

EDWARD W. BROWN...COMPLAINANT

vs.....DECREE

ERNESTINE MASON BROWN.

Filed Oct. 10, 1871

5 pg. 361

HUGH L. HOLLAND
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

EDWARD W. BROWN.....COMPLAINANT

vs.....BILL OF COMPLAINT

ERNESTINE MASON BROWN.....DEFENDANT

To the Honorable Circuit Court of Nansemond County:

Your complainant, Edward W. Brown, respectfully represents:

(1) - That on the 22nd day of September, 1912, your complainant, was lawfully married at Whaleyville, in Nansemond County, Virginia, to Ernestine Mason Brown, whose maiden name was Ernestine Mason, as will appear from a certificate of marriage herewith filed, marked "Exhibit A, and made a part of this bill; and,

(2) - That continuously from the date of said marriage until the day of March, 1918, your complainant and the said Ernestine Mason Brown lived together as husband and wife in Philadelphia Suburbs, near the City of Suffolk, in Nansemond County, Virginia, and;

(3) - That the said Ernestine Mason Brown has wilfully deserted and abandoned your complainant for a period of more than three years; that is to say, on the day of March, 1918, the said Ernestine Mason Brown did, voluntarily, wilfully, and without any justification whatever, leave her home; that before leaving she stated repeatedly that she was going to leave him forever and that she would never return to him; and that your complainant and the said Ernestine Mason Brown have not lived together as husband and wife since the day of March, 1918; and,

(4) - That your complainant has resided and has been domiciled in this state ever since the aforesaid marriage, and for more than one year next preceding the commencement of this suit, and is domiciled and now resides in this state; and;

(5) - That your complainant last cohabited with the said Ernestine Mason Brown in Philadelphia Suburbs, near the City of Suffolk, in the County of Nansemond, Virginia.

In consideration whereof, and forasmuch as your complainant is remediless in the premises save in a Court of Equity, your complainant prays that the said Ernestine Mason Brown may be made a party defendant to this bill, and required, but not on oath, to answer the same, the oath being hereby waived; that proper process may be issued; that a divorce from the bond of matrimony which was created by the aforesaid marriage be decreed him; and that your complainant may have all such further and other, and general relief in the premises as the nature of his case may require and to equity shall seem meet.

Edward W. Brown
Complainant.

By

Henry J. Holland
Counsel

Henry J. Holland,
Counsel.

EDWARD W. BROWN...COMPLAINANT

vs.....BILL OF COMPLAINT

ERNESTINE MASON BROWN...
DEFENDANT.

*Filed July 18, 1921
G. L. Holland
Clerk*

HUGH L. HOLLAND
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

Hugh W. Hollen I, D. 9

Edward H. Brown

vs

Ernestine Marion Brown

Final Account

Oct. 10, 1921

W. J. H. H. H. H. H.