1923-002
Nansemond Co (Suffolk) Chancery Causes: Adolphus Freeman vs Amy Holliman et al

Jones, Cooper, Clayton, Whirley, Pinner, Whittaker, Norfleet, Lewis

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

Adolphus Freeman.....Complainant

Vs. IN CHANCERY

Amy Holliman, Ida Freeman, Minnie Jones, Robert Jones, Sarah Freeman, Lena Freeman, Romus Cooper, Estella Clayton, William Clayton, John N. Whirley, Royal Stephen Whirley, Stephen Whirly, Nathaniel Freeman, Estella Freeman and George Cooper, the last three being infants under twenty-one years of age.....Defendants

TO THE CLERK OF THE CIRCUIT COURT OF NANSEMOND COUNTY:

Please issue summons in Chancery to Second May Rules (Third Monday), 1920.

Lewis H Harris

May 7,1920,process issued,returnable to May Rules,Third Monday,1920.

Memo.& Rules Notes

RECEIVED of G. A. Harris, Special Commissioner, the sum of $7.74, same representing my distributive share in the proceeds of sale of property in the chancery suit of Adolphus Freeman v. Amy Holliman et als.

Given under my hand this 7th day of ~~November~~ July, 1923.

Witness: John Allen.
Lennie Glenn: John N. Whirley.

RECEIVED of G. A. Harris, Special Commissioner, the sum of $7.74, same representing my distributive share in the pro ceeds of sale in thenchancery suit of Adolphus Freeman et Amy Holliman et als.

Given under my hand this 17 day of November, 1920

Witness: Wm. F. Bradley

Witness L. E. Gleaves

his
Royal Stephen X Whiteley
Mark

RECEIVED of G. A. Harris, Special Commissioner, the sum of $29.89, same representing distributive share of Estella Freeman (infant) in the proceeds of sale of property in the chancery suit of Adolphus Freeman v. Amy Holliman et als, same being a one-sixth interest of the said Estella Freeman after deducting dower of her mother Lena Freeman.

Given under my hand this 29th day of Nov. ,1920.

Witness E. Oakley
Mary Shine

Lena E Freeman
For Estella Freeman.

Lena Freeman

RECEIVED of G. A. Harris, Special Commissioner, the sum of $10.04, same representing my distributive share in the proceeds of sale of property in the chancery suit of Adolphus Freeman v. Amy Holliman et als.

Given under my hand this 29th day of Nov. ,1920

Witness: E Blakely
Mary Freeman

Lena C. Freeman

RECEIVED of G. A. Harris, Special Commissioner, the sum of $6.80, same representing my distributive share in the sale of property in the chancery suit of Adolphus Freeman v. Amy Holliman et als.

Given under my hand this 29th day of November, 1920.

Witness: _____ Minnie C. Jones

RECEIVED OF G. A. HARRIS, Special Commissioner, the sum of $24.45, same representing my distributive share in the sale of property in the chancery suit of Adolphus Freeman v. Amy Holliman et als.

Given under my hand this 17th day of November, 1920.

Witness L. E. Glenn.

Witness J. H. Jones.

his
Stephen X Whiteley.
mark

Estella Clayton

RECEIVED OF G. A. Harris, Special Commissioner, the sum of $39.93, same representing my distributive share of one-sixth interest in the proceeds of sale of property in the chancery suit of Adolphus Freeman v. Amy Holliman et als.

Given under my hand this 29th day of Nov. ,1920.

Witness: W. L. Lakey
Mary Levine

Estella Clayton

Amy Holliman

RECEIVED of G. A. Harris, Special Commissioner the sum of $59.93, same representing my distributive share of one-sixth interest in the proceeds of sale of property in the chancery suit of Adolphus Freeman v. Amy Holliman et als.

Given under my hand this 1st day of December, 1920.

Witness: Sanity LaLane
Willie Bass

Amy Holliman

RECEIVED of G. A. Harris, Special Commissioner, the sum of $9.02, same representing my distributive share in the dower of my husband, Anthony Freeman, in the proceeds of sale of property in the chancery suit of Adolphus Freeman v. Amy Holliman et als.

Given under my hand this 29th day of Nov ,1920

Ella Freeman

Nathaniel Freeman

RECEIVED of G. A. Harris, Special Commissioner, the sum of $15.45, same representing my distributive share, after deducting dower interest of my mother, Ida Freeman, in the proceeds of sale of property in the chancery suit of Adolphus Freeman v. Amy Holliman et als.

Given under my hand this 23rd day of Nov. 1920

Nathaniel Freeman

Received of G. A. Harris, Special Commissioner, the sum of $26.34, same representing my curtesy interest one-sixth inter est of Mary Cooper, in the proceeds of sale of property in the chancery suit of Adolphus Freeman v. Amy Holliman et als.

Given under my hand this 29th day of Nov 1920.

Witness
J. P. S. Beal

Romus Cooper

RECEIVED of G. A. Harris, Special Commissioner, the sum of $15.46, same representing my distributive share, after deducting dower interest of my mother, Ida Freeman, in the proceeds of sale of property in the chancery suit of Adolphus Freeman v. Amy Holliman et als.

Given under my hand this 24th day of Nov ,1920.

Adolphus Freeman

G. Ida Freeman

George Cooper

RECEIVED of G. A. Harris, Special Commissioner, ~~XX~~ the sum of $6.79, same representing my distributive share in the proceeds of sale of property in the chancery suit of Adolphus Freeman v. Amy Holliman et als.

Given under my hand this 29th day of November, 1920.

George Cooper

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY

Adolphus Freeman .....Complainant

vs

Amy Holliman et als .....Defendants

Your undersigned Special Commissioner, pursuant to a decree entered in this cause on the 20th day of November, 1920, would respectfully report to the Court that he has disbursed the $239.61 to the parties entitled thereto as follows:

Amy Holliman One-sixth interest	$39.93 ✓
Estella Clayton one-sixth interest	39.93 ✓
Ida Freeman dower in her husband, Anthony Freeman, in one-sixth	9.02 ✓
Adolphus Freeman, son of Anthony Freeman one-half of one-sixth after deducting dower interest of his mother, Ida Freeman	15.46 ✓
Nathaniel Freeman, son of Anthony Freeman one-half of one-sixth after deducting dower of his mother, Ida Freeman	15.45 ✓
Lena Freeman, wife of David Freeman, Dower in her husband one-sixth	10.04 ✓
Lena Freeman, mother of Estella Freeman remainder of one-sixth interest after deducting dower of her mother, Lena Freeman, wife of David Freeman, same to be used by the said Lena Freeman for the maintenance and education of said Estella Freeman	29.89 ✓
Romus Cooper, Husband of Mary Cooper Curtesy in her one-sixth interest	26.37 ✓
George Cooper, one half of one-sixth interest after deducting curtesy of Romus Cooper	6.79 ✓
Minnie Jones, one-half of one-sixth interest of her mother, Mary Cooper, after deducting curtesy interest of Romus Cooper	6.80 ✓

Stephen Whirley, one-sixth interest curtesy in Winnie Freeman, his wife,	$24.45
John N. Whirley, one-half of one-sixth interest after deducting curtesy of his father, Stephen Whirley	7.74
Royal Stephen Whirly one-half of one-sixth interest after deducting curtesy of his father, Stephen Whirley	7.74
	$239.61

The object of this suit having been accomplished your Special Commissioner will recommend that this report be approved, ratified and confirmed, and that the case be dismissed from the docket.

Respectfully submitted this 7th day of February, 1923.

G. A. Harris
Special Commissioner

VIRGINIA

IN THE CIRCUIT COURT
OF NANSEMOND COUNTY

Adolphus Freeman

vs

Amy Holliman et als

.....

REPORT

1923 Feb. Filed [illegible]

RECEIVED of G. A. Harris, Special Commissioner the sum of $27.55, same being in full payment of all costs, including Clerk's fees, in the suit of Adolphus Freeman v. Amy Hollimon et als.

Given under my hand this 20th day of November, 1920.

Clerk of the Circuit Court of
Nansemond County, Virginia.

RECEIVED of C. A. Harris, Special Commissioner, the sum of Five Dollars ($5.00), same being in fully of services of undersigned in making appraisement of property sold in the chancery suit of Adolphus Freeman v. Amy Holliman et als.

Given under our hands this 26th day of November, 1920.

R J Nisbet & B L Lum
By RJ Nisbet

RECEIVED of G. A. Harris, Special Commissioner, the sum of Ten Dollars, same being in payment for services as auctioneer in sale of property in the suit of Adolphus Freeman v. Amy Holliman et als.

Given under my hand this 26th day of November, 1920.

A. Lucas Freeman

RECEIVED of G. A. Harris, Special Commissioner, the sum of Two Dollars and Fifty Cents ($2.50), in payment of services for taking depositions in the chancery suit of Adolphus Freeman v. Amy Holliman et als.

Given under my hand this day of November, 1920.

Sue P. S. Bear

RECEIVED of G. A. Harris, Special Commissioner, the sum of Ten Dollars ($10.00), same being in payment for drawing deed from G. A. Harris, Special Commissioner to W.T. Fuller in the chancery suit of Adolphus Freeman v. Amy Hollimann et als.

Given under mur hands this day of November, 1920.

LEWIS AND HARRIS

By Lee P. S. Beal

Suffolk, Virginia.

RECEIVED of G. A. Harris, Special Commissioner, the sum of Five Dollars ($5.00), representing payment in full for services as Guardian ad litem for the infant defendants, in the chancery suit of Adolphus Freeman v. Amy Holliman et als.

Given under my hand this 26th day of November, 1920.

Wm. S. Holland

Guardian ad Litem for the Infant Defendants.

OFFICE OF
C. R. FULGHAM, TREASURER
OF NANSEMOND COUNTY
VIRGINIA

Suffolk, Va., Nov. 26th 1920

Received of G. A. Harris Atty Commissioner

Only - Seventy Nine cents 79/100 Dollars

On Account of Taxes for Year 1919 on Lot #68 W Jericho, Chid. in

Name of John Freeman

T. H. Holmes Dep'g

Treasurer

Tubb Printing. E. L. Foil Co.

NOTICE OF SALE OF REAL ESTATE

Pursuant to a decree of the Circuit Court of Nansemond county, Virginia, in the matter of Adolphus Freeman vs. Amy Holliman et als, I shall sell at public auction on July 26, 1920, at 12 o'clock M., in front of the National Bank of Suffolk building, in the City of Suffolk, that certain piece of real estate described in the bill in these proceedings, situated on Front street, Jericho.

Terms: Cash.

Sale will be made subject to confirmation by the court.

G. A. HARRIS,
Special Commissioner.

I, George E. Bunting, clerk of the Circuit Court of Nansemond county, Virginia, do hereby certify that the bond required by the above decree has been duly executed.

Given under my hand this 13th day of July, 1920.

G. E. BUNTING,
Clerk of the Circuit Court of Nansemond County, Virginia.

jy20-5t

Suffolk

Norfolk, Va. AUG 31 1920 19

G. A. Harris, Spfld Comr

To Ledger-Dispatch Corp.

		To Advertising July, ACCOUNT RENDERED.	5	50

Pd
Allen Carter

Received Payment, LEDGER-DISPATCH CORPORATION

Aug 13

$10.00 RECEIVED of G.A.Harris, Special Commissioner, in the suit of Adolphus Freeman vs. Holloman, the sum of Ten and no/100, dollars, for services in making report in the above styled suit.

Given under my hand this 6th day of Sept.1920.

M. Anderson Mayes

Commissioner In Chancery

Yazoo County

Suffolk, Virginia November 26th, 1920

RECEIVED of G. A. Harris, Special Commissioner, the sum of Forty Dollars ($40.00), same being in full for legal services in conducting chancery suit of Adolphus Freeman v. Amy Holliman et als.

LEWIS AND HARRIS

By L. P. D. Beale

VIRGINIA:

IN THE CIRCUIT COURT OF THE CITY OF SUFFOLK.

Adolphus Freeman----------Complainant

v. IN CHANCERY

Amy Holliman et als----------Defendants

TO THE HONORABLE JAMES L. McLEMORE, JUDGE OF THE CIRCUIT COURT OF THE CITY OF SUFFOLK, VIRGINIA.

Your undersigned Special Commissioner would respectfully report to the Court as follows:

By decree entered in this cause on the 30th day of July, 1920, your Special Commissioner was directed, upon the payment to him of $375.00, the purchase price of the land sold by your Special Commissioner in these proceedings, to pay all Court costs in the same, including anattorneys' fee of $40.00 of Lewis and Harris for legal services in conducting this suit, and to report to the Court.

Wherefore, your said Special Commissioner would respectfully report as follows:

That upon the collection by him of the $375.00 aforesaid, he has disbursed the sum of $135.39 as follows:

By amount paid Lewis and Harris, Attorneys, for legal services in conducting suit	$40.00
By amount paid J. Walter Hosier, auctioneer	10.00
By amount paid S.P.S.Beal for stenographic services in taking depositions	2.50
By amount paid G.E.Bunting, Clerk's fees	27.35
By amount paid M.Anderson Maxey, Commissioner	10.00
By amount paid William S.Holland, Guardian ad litem for the infant defendants	5.00

By amount paid R. J. Norfleet and C.L. Lewis for making appraisement of property	$5.00
By amount paid Lewis and Harris for drawing Commissioners deed	10.00
By amount paid for docket stamp on deed	50
By amount paid for taxes for year 1919	79
By amount paid Ledger-Dispatch for advertising sale of property	5.50
By amount paid Commission on purchase price of $375.00	18.75
	$155.59

(Receipts for the foregoing amounts are filed herewith.)

All of which is respectfully submitted to the Court.

G A Harris
Special Commissioner.

Adolphus Freeman
v In Chancery
Amy Stalemans, et ux

Report of
Commissioner

1920 Nov. 20th Filed.
J. M.

VIRGINIA:

IN THE CIRCUIT COURT OF THE CITY OF SUFFOLK.

Addphus Freeman----------Complainant

v.

Amy Holliman et als----------Defendants

This cause came on this day to be further heard on the papers formerly read, and the report of G. A. Harris, Special Commissioner, this day filed, and was argued by counsel.

And it appearing from the report of the said Special Commissioner that, after paying the costs of this suit already he incurred, has in hand an amount of $239.61.

On consideration whereof, and by consent of parties the Court doth order, adjudge and decree that the said Special Commissioner be, and he hereby is directed to distribute the said sum of $239.61 to the parties entitled thereto as follows, to-wit:

Amy Holliman One-sixth interest	$39.93
Estella Clayton one-sixth interest	39.93
Ida Freeman dower in her husband, Anthony Freeman in one-sixth	9.02
Adolphus Freeman, son of Anthorny Freeman one-half of one-sixth after deducting dower interest of his mother, Ida Freeman	15.46
Nathaniel Freeman, son of Anthony Freeman one-half of one-sixth after deducting dower of his mother Ida Freeman	15.45
Lena Freeman, wife of David Freeman, Dower in her husband one-sixth	10.04
Lena Freeman, mother of Estella Freeman remainder of one-sixth interest after deducting dower of her mother, Lena Freeman, wife of David Freeman, Sums to be used by the said Lena Freeman for the maintenance and education of the said Estella Freeman.	29.89
Romus Cooper, husband of Mary Cooper, Curtesy in her one-sixth interest	26.37
George Cooper, one-half of one-sixth interest after deducting curtesy of Romus Cooper R	6.79

Minnie Jones, one-half of one-sixth interest of her mother, Mary Cooper, after deducting curtesy interest of Romus Cooper	$6.80
Stephen Whirley, one-sixth interest curtesy in Winnie Freeman, his wife,	24.45
John N. Whirley, one-half of one-sixth interest after deducting curtesy of his father, Stephen Whirley	7.74
Royal Stephen Whirly one-half of one-sixth interest after deducting curtesy of his father Stephen Whirley	7.74
	$239.61

And the Commissioner shall report to the Court.

Adolphus Freeman
v.s. In Chancery
Amy Hallman et al.

Decree

We Consent to this decree.
Amy Halliman
Ida Freeman
Minnie Jones
Robert Jones
Sarah Freeman
Lena Freeman
Romus Cooper
Estella Leighton
Wm Leighton
John N. Whitley
Royal Stephen Whitley
Stephen Whitley
by Romus Cooper
Romus Cooper
Wm S. Holland
guardian ad litem
of all infants defendants

G A Harris, J. J.

Enter Nov. 20th 1920

Jas L McGuire.

#5-Fg, 311

Witness to
Romus Coopers signature
J. P. S. Beal.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY

Adolphus Freeman----------Complainant

vs. IN CHANCERY

Amy Holliman et als----------Defendants

This cause came on this day to be further heard on the papers formerly read, and the report of sale made by the Commissioner pursuant to an order of the 12th day of July last, which report is this day filed, and to which there is no exception, and was argued by counsel.

On consideration whereof, and by consent of all parties, the Court approving and confirming said report, doth adjudge, order and decree that, upon the payment by W.T.Fullerx of the sum of Three Hundred and Seventy-Five Dollars ($375.00), the purchase price of the land and premises to be sold by said decretal order as follows, to-wit:

> "Beginning at a point on the North side or Railroad Avenue in said West Jericho, Eighty (80) feet East of the Northwest corner of said Railroad Avenue, and Third Street in said West Jericho, and running thence Eastwardly and fronting on said Railroad Avenue Forty (40) feet; thence Northerly and at right angles to said Railroad Avenue, and in a line parallel with said Third Street One Hundred and Twenty (120) feet; thence Westerly in a line parallel with said Railroad Avenue Forty (40) feet; and thence running Southwardly in a straight line one hundred and twenty (120) feet to the beginning.
>
> Being and constituting Lots. No.68 in said West Hericho, as per plat duly of record in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, in D.B.No.22,Page 306.
>
> And is the same land conveyed to John Freeman by deed from Jno. F.Pinner and wife, bearing date the 30th day of December, 1890, and of record in said Clerk's Office in D.B.No.25,Page 89,"

the said Commissioner does convey to the said Romus Cooper,

with Special Warranty, the said land above described; and it is further ordered that when the Commissioner shall have received payment of the said sum of Three Hundred and Seventy-Five Dollars ($375.00), he shall first pay all court costs in these proceedings, including an attorney's fee to Lewis and Harris of $40 for legal services in conducting this suit, and the said commissioner shall report to Court.

Virgihia
Circuit Court of Nansemond Co.

Adolphus Freeman

vs.

Amy Holliman et als

Decree Confirming Sale

We hereby Consent to this
decree
Amy Holliman
Ida Freeman
Minnie Jones
Robert Jones
Sarah Freeman
Lena Freeman
~~Rennor Cooper~~ Celoy Iver
Estella Celoy Iver
Wm Celoy Iver
John N. Whitley
Neval Stephen Whitley
Stephen Whitley
By Rennor Cooper
his atty in fact.

Witness Lena E Freeman
Witness Lena E Freeman

Rennor Cooper
Mark

W. S. Holland, guardian
ad litem of Estella Freeman,
Nathaniel Freeman, and
George Cooper —
G. A. Travis p. q.
Enter July 20. 1920
Jas. L. McElmore

Fee $2.00

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

Adolphus Freeman----------Complainant

vs. IN CHANCERY

Amy Holliman et als----------Defendants

TO THE HONORABLE JAMES L. McLEMORE, JUDGE:

The undersigned, in pursuance to a decretal order in the Circuit Court of Nansemond County, Virginia, pronounced on the 12th day of July, 1920, in a cause in chancery in said Court depending, after having advertised the time, place and terms of sale in the Ledger-Dispatch, a newspaper having a general circulation in the City of Suffolk, Virginia, for five (5) consecutive times, and also posting notice thereof at the door of the Courthouse of Nansemond County, Virginia, and in more than three other public places in the City of Suffolk, Virginia, for at least ten days prior to date of sale, did offer for sale at public auction on the 26th day of July, 1920, at twelve o'clock M., in front of the National Bank of Suffolk Building, in the City of Suffolk, the following pieces or parcel of land, to-wit:

"Beginning at a point on the North side of Railroad Avenue in said West Jericho, Eighty (80) feet East of the Northwest corner of said Railroad Avenue and Third Street in said West Jericho, and running thence Eastwardly and fronting on said Railroad Avenue Forty (40) feet; thence Northerly and at right angles to said Railroad Avenue and in a line parallel with said Third Street One Hundred and Twenty (120) feet; thence Westerly in a line parallel with said Railroad Avenue Forty (40) feet; and thence running Southwardly in a straight line one hundred and twenty (120) feet to the beginning.

Being and constituting Lot No.68, in said West Jericho, as per plat dully of record of in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, in D.B.No.22, Page 306.

And is the same land conveyed to John Freeman by deed from Jno.F.Pinner and wife, bearing date the 30th

day of December, 1890, and of record in said Clerk's Office in D.B.No.25, Page 89",

at which sale W.T. Fuller bid the sum of Three Hundred and Seventy-Five Dollars ($375.00) for said property, and his bid being the highest and best bid made for the said property it was struck off to the said W.T.Fuller, subject to confirmation of the Court.

Your Commissioner would respectfully recommend that this bid be accepted and confirmed by the Court.

Respectfully submitted this 27th day of July, 1920.

G. A. Harris
Commissioner.

Vircinia

In the Circuit Court of
Nansemond County.

Adolphus Freeman

vs.

Amy Holliman et als

Report of Special Commissione:

1920 July 30. filed J.L.M.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

Adolphus Freeman----------Complainant

Vs. IN CHANCERY

Amy Holliman, Ida Freeman, Minnie Jones, Robert Jones, Sarah Freeman, Lena Freeman, Romus Cooper, Estella Clayton, William Clayton, John N. Whirley, Royal Stephen Whirley, Stephen Whirley, Nathaniel Freeman, Estella Freeman and George Cooper, the last three being infants under twenty-one years of age----------Defendants

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This day came Adolphus Freeman and by leave of court ~~and with consent of all parties to this suit~~, filed his bill and on his motion William S. Holland, a discreet and competent attorney at law, was assigned as Guardian ad Litem of the infant defendants, Nathaniel Freeman, Estella Freeman and George Cooper, to defend their interest in this suit, and thereupon the said William S. Holland, as such Guardian ad Litem, filed his answer and the answers of the infant defendants to the bill of the plaintiff, and the adult defendants filed their answers; to which several answers the plaintiff, by counsel, replied generally.

On consideration whereof, and by consent of all parties, the court doth adjudge, order and decree that the papers in this cause be referred to one of the Commissioners of this Court, who is directed to enquire into and report to the Court:

1. Whether the real estate mentioned in the bill can be conveniently divided in kind among the several parties entitled to share therein.

2. If the same cannot be conveniently divided in kind if any party will take the entire property and pay to the others such sums of money as their interest may entitle them to.

3. And if the same cannot be conveniently divided in kind and if no one party will take the entire property and pay the others for their share in the same, whether the interest of all those entitled to said property and its proceeds, will be promoted by a sale of the entire property, or by allotment and sale of the residue.

4. If there are any delinquent taxes against said property.

5. If all proper parties are before the Court and what are their respective interests in said property.

6. What is its fee simple and annual value.

Adolphus Freeman

Amy J. Hallman Chancery
~~Gordie Hudson~~ et als

Ys. Suit

This Deed

Estella Freeman
Nathaniel Freeman
George Cooper
By their Guardian
ad litem, W.S. Holland

W.S. Holland guardian
ad litem of all infants
defendants.
Amy Hallman
Ida Freeman
Minnie Jones
Robert Jones
Sarah Freeman
Lena Freeman
Rollena Clayton
William Clayton
John N. Wheeley
Royal Stephen Wheeley
Stephen Wheeley.
By Romus Cooper
their attorney in fact.
Romus Cooper

Witness to Romus Cooper signature.
Lessa E. Freeman
Guthrie O.T.

Entered June 26. 1920
Ida L. McMahon
Co. Clk. Okfs. Co.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

Adolphus Freeman----------Complainant

vs. IN CHANCERY

Amy Hollimanm Ida Freeman, Minnie Jones, Robert Jones, Sarah Freeman, Lena Freeman, Romus Cooper, Estella Clayton, William Clayton, John N, Whirley, Royal Stephen Whirley, Stephen Whirley, Nathaniel Freeman, Estella Freeman, and George Cooper, the last three being infants under twenty-one years of age----------Defendants

This cause came on this day to be again heard on the papers formerly read and report of M. Anderson Maxey, Commissioner, dated on the 8th day of July, 1920, with the exhibits filed there with, which report was filed this day, and to which no exception has been taken, and all parties to this suit having waived the ten days for exception, and was argued by counsel.

On consideration whereof, and with the consent of all parties, the Court doth approve and confirm the said report, and doth adjudge, order and decree that G. A. Harris, who is hereby appointed special commissioner for that purpose, do proceed, after having advertised the time, place and terms of sale in one or more of the newspapers having a general circulation in the City of Suffolk, Virginia, for five consecutive days, and also posted notice thereof at the front door of the courthouse of Nansemond County and three other public places in the City of Suffolk, for at least ten days prior to day of sale, to sell the real estate in the bill and proceedings mentioned, of which John Freeman died seised and possessed, situated, lying and being in Nansemond County, Virginia, and described in a certain deed duly of record in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, as follows, to-wit:

"Beginning at a point on the North side of Railroad Avenue in said West Jericho, Eighty (80) feet east of the Northwest corner of said Railroad Avenue and Third Street in said West Jericho, and running thence Eastwardly and fronting on said Railroad Avenue Forty (40) feet; thence Northerly and at right angles to said Railroad Avenue and in a line parallel with said Third Street One Hundred and Twenty (120) feet; thence Westerly in a line parallel with said Railroad Avenue Forty (40) feet; and thence running Southwardly in a straight line one hundred and twenty (120) feet to the beginning.

Being and constituting Lot No.68, in said West Jericho, as per plat duly of record in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, in D.B.No.22, Page 306.

And is the same land conveyed to John Freeman by deed from Jno. F. Pinner and wife, bearing date the 30th day of December, 1890, and of record in said Clerk's Office in D.B.No.25, Page 89."

TERMS: Cash.

But the said commissioner shall have no power to execute this decree until he shall enter into bond with sufficient security to be approved by the Clerk of this Court, payable to the Commonwealth of Virginia, in the penalty of $500.00, and conditioned for the faithful discharge of his duties hereunder.

And the said Commissioner shall report to the Court.

Adolphus Freeman

vs In Chancery

Amy Hollinan et al

Decree Confirming
Commissioners
report

We hereby consent to this
decree.

Amy Hollinan
Ed Freeman
Minnie Jones
Robert Jones
Sarah Freeman
Lena Freeman
Ronnus Cooper
Estella Taloylor
Wm Taloylor
John W. Whitley Whitley
Roy al Stephens
Stephen Whitley
his
by Ronnus + Cooper
mark
their attorney-in-fact.
his
Ronnus + Cooper
mark

Exh. 5 page 1 of 3

Witness Lena E Freeman
witness G A Harris

William S. Holland guardian
ad litem of Nathaniel Freeman
Estella Freeman, and
George Cooper

G A Harris

Entered July 12. 1920.

Jas L. W. Lamar

COMMISSIONER'S REPORT.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

Adolphus Freeman----------Complainant

vs.

Amy Holliman, Ida Freeman, Minnie Jones, Robert Jones, Sarah Freeman, Lena Freeman, Romus Cooper, Estella Clayton, William Clayton, John M. Whirley, Royal Stephen Whirley, Stephen Whirely, Nathaniel Freeman, Estella Freeman, and George Cooper, the last three being infants under twenty-one years of age----------Defendants.

Office of Commissioner.

Suffolk, Va., July 8th, 1920

To the Honorable James L. McLemore, Judge of the Circuit Court of Nansemond County, Virginia.

In pursuance of a decree of your honor's court, entered in the suit of which the above is the general style, on the 26th day of June, 1920, I gave notice to the parties that on the 30th day of June, 1920, at 3 o'clock P.M., at the office of Messrs. Lewis & Harris, Attorneys at Law, Suffolk, Virginia, I should proceed to execute the said decree. The said notice, with service of the same acknowledged by the counsel for the complainant and the guardian ad litem of the infants, is herewith returned.

I attended at the time and place so appointed, and in the presence of Mr. G. A. Harris, of counsel for the complainant and of Mr. William S. Holland, Jr., the guardian ad litem of the infant defendants, I took the depositions of R. J. Norfleet, C. L. Lewis, Romus Cooper and Lena Freeman.

The said depositions are herewith returned, and after consideration of the same, together with the pleadings in the cause, I respectfully report:

1. That the real estate mentioned in said bill cannot be conveniently divided in kind, among the several parties entitled to share therein.

2. That no party entitled to share in the property will take the entire property, and pay to others such sums as their interest may entitle them to.

3. The interest of the said parties will be promoted by the sale of said real estate.

4. The taxes for the year 1919 Seventy nine cents ($.79) are delinquent against this property.

5. All proper parties to this suit are before Court and their respective interests are as follows:

Amy Holliman, a daughter of John Freeman, deceased, whose interest is one-sixth (1/6) of the said property.

Estella Clayton, a daughter of John Freeman, deceased, whose interest is one-sixth (1/6) of the said property.

Nathaniel Freeman (an infant 18 years of age) and Adolphus Freeman, children of Anthony Freeman, a deceased son, whose interests are one-twelfth (1/12) each of the said property.

Ida Freeman, the widow of Anthony Freeman, a deceased son, who has a dower interest in one-sixth (1/6) of said property.

Estella Freeman, (an infant 6 years of age) the only child of David Freeman, a deceased son, whose interest is one-sixth (1/6) of said property.

Lena Freeman, the widow of David Freeman, a deceased son, who has a dower interest in one-sixth (1/6) of said property.

George Cooper, (an infant 18 years of age) and Minnie Jones, children of Mary J. Cooper, a deceased daughter, whose interests are one-twelfth (1/12) each of said property.

Romus Cooper, the widower of Mary J. Cooper, a deceased daughter, who has a courtesy right in one-sixth (1/6) of the said property.

Roy Whirley and John N. Whirley, children of a deceased daughter, Minnie Freeman, whose interests are one-twelfth (1/12) each of the said property.

Stephen Whirley, the widower of Minnie Freeman, a deceased daughter, who has a courtesy right in one sixth (1/6) of said property.

6. The fee-simple value of the property is from Three Hundred and Fifty Dollars ($350) to Four Hundred Dollars ($400). It has no annual value.

Respectfully submitted,

M. Anderson Mauzy Commissioner.

Commissioner's Fee $_____.

VIRGINIA:

IN THE CIRCUIT COURT NANSEMOND COUNTY.

Adolphus Freeman----------Complainant

Vs. IN CHANCERY

Amy Holliman, Ida Freeman, Minnie Jones, Robert Jones, Sarah Freeman, Lena Freeman, Romus Cooper, Estella Clayton, William Clayton, John N, Whirley, Royal Stephen Whirley, Stephen Whirely, Nathaniel Freeman, Estella Freeman, and George Cooper, the last three being infants under twenty-one years of age----------Defendants

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EXTRACTS FROM DECREE ENTERED ON THE 26th DAY OF JUNE, 1920.

"On consideration whereof, and by consent of all parties, the court doth adjudge, order and decree that the papers in this cause be referred to one of the Commissioners of this Court, who is directed to enquire into and report to this Court:

1. Whether the real estate mentioned in the bill can be conveniently divided in kind amoung the several parties entitled to share therein.

2. If the same cannot be conveniently divided in kind, if any party will take the entire property and pay to the others such sums of money as their interest may entitle them to.

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

4. If there are any delinquent taxes against said property.

5. If all proper parties are before the Court and what are their respective interests in said property.

6. What is its fee simple and annual value.

Office of M. Anderson Maxey,
Commissioner in Chancery for the
Circuit Court of Nansemond County.

TO THE PARTIES TO THE ABOVE SUIT:

I have fixed on the 30th day of June, 1920, at three o'clock P.M., as the time, and the offices of Lewis and Harris, in the City of Suffolk, Virginia, as the place for executing the decree, of which the foregoing is an extract.

Given under my hand as Commissioner in Chancery for the Circuit Court of Nansemond County, Virginia, this 26th day of June, 1920.

M. Anderson Maxey
Commissioner in Chancery for the Circuit Court of Nansemond County, Virginia.

We hereby accept legal service of the above notice.

witness:
M. Anderson Maxey

Romus his x mark Cooper
Attorney in Fact for all of the Adult Defendants.

Wm. S. Holland
Guardian ad Litem of the Infant Defendants

G. A. Harris
Attorneys for the Plaintiff.

R. J. NORFLEET Examined by Mr. Maxey

R. J. Norfleet being duly sworn deposeth as follows:

Mr. Norfleet, please state your name, age, residence and occupation.

R. J. Norfleet, fifty-three, Suffolk, real estate and insurance.

Q. Do you know the real estate mentioned in the bill in the suit of Adolphus Freeman vs. Amy Holliman?

A. Yes, I do.

Q. Is that property, in your opinion, capable of being divided in kind among the several parties entitled to share therein?

A. No it is not. There is only a small building lot about forty by one hundred and twenty feet, with a small two-room dwelling.

Q. Will any party entitled to share therein take the entire property and pay to the others such sums of money as their interest may entitle them to?

A. Not to my knowledge.

Q. Will the interest of those entitled to the property or its proceeds be promoted by a sale of the property and a distribution of the proceeds to those entitled to it?

A. It would be to their interest to make sale of it.

Q. What, in your opinion is the fee simple value of the property in question?

A. I should say about Two Hundred and Fifty Dollars for the lot, and One Hundred and Fifty Dollars for the house.

Q. What is its annual value?

A. It has no annual value. There in an old two-room dwelling not suitable for people to live in.

And further this deponent saith not.

(Signature waived)

ROMUS COOPER

Romus Cooper being duly sworn testified as follows:

Please state your name, age, residence and occupation.

A. Romus Cooper, Hericho, East Suffolk, forty-eight years, farm laborer.

Q. Please state whether in your opinion the real estate mentioned in the bill in the suit of Adolphus Freeman vs. Amy Holliman is capable of being conveniently divided in kind among the several parties entitled to share therein?

A. No, sir, it could not be; the lot is only forty by one hundred and twenty feet, you could not do much dividing of that.

Q. Do you know any party entitled to share therein who would take the entire property and pay to the others such sums of money as their interest may entitle them to?

A. No, sir, not that I know of.

Q. Do you think it will be to the interest of all of these parties to sell this real estate and divide the proceeds among them?

A. Yes, sir, I do, because it has no rental value. No one will keep it up and it will come to nothing.

Q. Do you know the heirs of John Freeman, deceased?

A. Yes, sir, I know them all.

Q. Is the wife, mother of father of John Freeman living?

A. No, sir, all are dead.

Q. Did John Freeman leave any children, or heirs of deceased children?

A. Yes, sir.

Please state the names of the living children and the heirs of deceased children of John Freeman.

A. Amy Holliman, who is now a widow and Estella Clayton, who married William Clayton, are the only living children.

Anthony Freeman, the son of John Freeman, died leaving his wife, Ida Freeman, and two children, Adolphus Freeman, who married Sarah Whitaker, and Nathaniel, an infant now eighteen years of age;

David Freeman, another son of John Freeman, died leaving his wife, Lena Freeman, and one child, Estella Freeman, an infant six years of age;

Mary J. Cooper, who was my wife, how deceased, who alos left two children, Minnie Cooper, who married Robert Jones, and George Cooper an infant ;

Winnie Freeman, who married Stephen Whirley, and who died leaving her husband, Stephen Whirley, and two children, Roy Whirley and John N. Whirely.

Q. Are those just mentioned all the heirs of John Freeman deceased?

A. Yes, sir.

Q. Are you the Romus Cooper mentioned in the bill in the suit of Adolphus Freeman vs Amy Holliman, as the husband of Mary J. Cooper?

A. Yes, sir.

And further this deponent saith not.

(Signature waived).

C. L. LEWIS

C. L. Lewis being duly sworn, testified as follows:

Mr. Lewis please state your name, residence, age and occupation.

A. C. L. Lewis, Suffolk, Virginia, Forty-five, real estate operator.

Q. Are you acquainted with the property mentioned in the bill in the suit of Adolphus Freeman vs. Amy Holliman, et als, and which is located on Front Street in Jericho, Suffolk, Virginia?

A. Yes, I am.

Q. Could the same be conveniently divided in kind among the parties entitled to share therein.

A. No, it would not be practicable; there is only one small lot which is about forty by one hundred and twenty feet.

Q. Would the interest of all those entitled to said property or its proceeds be promoted by a sale of the same and distribution of the proceeds among them?

A. Yes.

Q. What, in your opinion, is the fee simple value of the property?

A. Three Hundred and Fifty Dollars is its fee simple value; it has no annual value.

And further this deponent saith not.

(Signature waived).

LENA FREEMAN

Lena Freeman, being duly sworn, testified as follows:

Please state your name, age, residence and occupation.

A. Lena Freeman, Thirty-three, East Suffolk; domestic.

Q. Do you know the heirs of John Freeman, deceased?

A. Yes.

Q. How many children are their now living of John Freeman, deceased?

A. Only two. Amy Holliman, who is a widow, and Estella Clayton, whose husband is named William Clayton.

Q. Are there any heirs of deceased children of John Freeman, deceased?

A. Yes. Anthony Freeman, the son of John Freeman, died, leaving Ida, his wife, and two children, Adolphus Freeman, who married Sarah Whitaker, and Nathaniel Freeman, now an infant eighteen years of age;

David Freeman, another son of John Freeman, who died leaving his wife, Lena Freeman, and one child, Estella Freeman, who is an infant six years of age;

Mary J. Cooper, a daughter of John Freeman, died leaving her husband, Romus Cooper, and two children, Minnie Cooper, who married Robert Jones and George Cooper, an infant eighteen years of age;

Winnie Freeman, another daughter of John Freeman, who married Stephen Whirley, died leaving her husband, Stephen Whirley, and two children, Roy Stephen Whirley

and John N. Whireley.

Q. Do you know of any other heirs of John Freeman?

A. No, sir, I do not.

Q. Are these all the heirs of John Freeman, deceased?

A. They are all I know anything about; I never heard of any others.

Q. Could the property in the bill in this suit be divided in kind among the several parties entitled to the same, or the proceeds thereof?

A. No, it is too small to be divided, as it is just a small building on a lot forty feet by one hundred and twenty feet.

Q. Will any party take the entire property and pay to the others such sums of money as their interest may entitle them to?

A. Not that I know of.

And further this deponent saith not.

(Signature waived).

COMMISSIONER'S REPORT.

Adolphus Freeman

v.

Amy Holliman et als.

1920. July 12. Filed J.L.H.

M. Anderson Maxey
Law Offices of
~~JAMES H. COBBLY~~
SUFFOLK, VIRGINIA

THE LINDEN PRINTING COMPANY, HARTFORD, CONN

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

Adolphus Freeman .....Complainant

vs

Amy Holliman et als .....Defendants

This cause came on this day to be further heard on the papers formerly read, and upon the report of C. A. Harris, Special Commissioner, this day filed, to which no exceptions have been taken and was argued by counsel.

On consideration whereof, and it appearing to the Court from the report of the said Special Commissioner, to which is attached receipts for all disbursements; that he has paid to those who were entitled to the funds in his hands from the sale of the property mentioned in the bill of these proceedings, as follows:

Amy Holliman one-sixth interest	$39.93
Estella Clayton one-sixth interest	39.93
Ida Freeman dower in her husband, Anthony Freeman in one-sixth	9.02
Adolphus Freeman, son of Anthony Freeman, one-half of one-sixth after deducting dower interest of his mother Ida Freeman	15.46
Nathaniel Freeman, son of Anthony Freeman, one-half of one-sixth after deducting dower of his mother, Ida Freeman	15.45
Lena Freeman, wife of David Freeman, Dower in her husband one-sixth	10.04
Lena Freeman, mother of Estella Freeman remainder of one-sixth interest after deducting dower of her mother, Lena Freeman, wife of David Freeman, same to be used by the said Lena Freeman for the maintenance and education of said Estella Freeman	29.89
Romus Cooper, husband of Mary Cooper Curtesy in her one-sixth interest	26.37
George Cooper, one half of one-sixth interest after deducting curtesy of Romus Cooper	6.79

Minnie Jones, One-half of one-sixth interest of her mother, Mary Cooper, after deducting curtesy interest of Romus Cooper	$ 6.80
Stephen Whirley, one-sixth interest curtesy in Winnie Freeman, his wife,	24.45
John N. Whirley, one-half of one-sixth interest after deducting curtesy of his father, Stephen Whirley	7.74
Royal Stephen Whirley one-half of one-sixth interest after deducting curtesy of his father, Stephen Whirley	7.74
	$239.61

The report of the Commissioner is hereby approved and the disbursements made by him are ratified and confirmed, and nothing further appearing to be done in this suit, it is therefore ordered to be dismissed from the docket.

VIRGINIA:

IN THE CIRCUIT COURT
OF NANSEMOND COUNTY.

Adolphus Freeman

vs

Amy Holliman et als

.....

D E C R E E

I Consent to this decree.

G A Harris
P.Q.

Enter Febry 3 1923.
Jas L McLemore,

#5 Pg. 407

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

ADOLPHUS FREEMAN----------COMPLAINANT

VS. IN CHANCERY

AMY HOLLIMAN ET ALS----------DEFENDANTS

The answer of Estella Freeman, Nathaniel Freeman and George Cooper, infants under twenty-one years of age, 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 them and others by Adolphus Freeman 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, they being of tender years, do not know what their true interest is 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 interest 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 said statements in the said bill contained.

He prays full protection for the said infant defendants.

And now, having fully answered, these defendants pray to be hence dismissed with their costs.

Estella Freeman
Nathaniel Freeman
George Cooper
By their Guardian ad Litem.

Wm. S. Holland
Guardian ad Litem for the Infant Defendants.

STATE OF VIRGINIA:

City of Suffolk, to-wit:

Sworn to before me in my city aforesaid by William S. Holland, Guardian ad Litem for the said infant defendants, this the 24th day of June, 1920.

Notary Public.

My commission expires the 16th day of February, 1924.

Adolphus Freeman

U.S. Ins Chancy

Army Hartman

Answer of Guardian
ad Litem and infant
defendants

1920 June 26. filed
J.M.

6

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

Adolphus Freeman----------Complainant

vs. IN CHANCERY

Amy Holliman et als----------Defendants

The joint and separate answers of Amy Holliman, Ida Freeman, Minnie Jones, Robert Jones, Sarah Freeman, Lena Freeman, Romus Cooper, Estella Clayton, William Clayton, John N. Whirley, Royal Stephen Whirley, Stephen Whirely, to a bill in equity filed against them and others, in the Circuit Court of Nansemond County, Virginia, by Adolphus Freeman.

These respondents, saving and reserving unto themselves, for answer to the said bill, answer and say that they believe the statements therein contained to be true.

These respondents do not object to the partition and sale of the land as prayed for in the said bill.

They concur in the prayer of the said bill, and they believe that it will be to the best interest of all parties concerned to make partition and sale of the property aforesaid.

And now, having fully answered, they pray to be hence dismissed with their costs, etc.

Minnie Jones.

Robert Jones

Amy Hallenan

Ida Freeman

Sarah Freeman

Lena Freeman

Estella Clayton

William Clayton

John N. Whitley

Roy al Stephen Whitley

Stephen Whitley

~~Romus Cooper~~

by Romus Cooper By ~~their Attorney~~. their Attorney in fact.

by Romus Cooper
mark

Witness to Romus Cooper signature Lena E. Freeman

Affidavit to foregoing answer waived.

Lewis Harris

Adolphus Freeman
vs In Chancery
Amy Hallman et al.

Answer of adult
defendants.

1920 June 26, Filed
JLm

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

Adolphus Freeman.....Complainant

vs. IN CHANCERY

Amy Holliman, Ida Freeman, Minnie Jones, Robert Jones, Sarah Freeman, Lena Freeman, Romus Cooper, Estella Clayton, William Clayton, John N. Whirley, Royal Stephen Whirley, Stephen Whirley, Nathaniel Freeman, Estella Freeman and George Cooper, the last three being infants under twenty-one years of age.....Defendants

TO THE HONORABLE JAMES L. McLEMORE, JUDGE OF THE Circuit Court of Nansemond County, Virginia:

Your complainant, Adolphus Freeman, showeth unto the Court that John Freeman was in his lifetime seised and possessed of certain real estate lying in the County of Nansemond and State of Virginia, described as follows:

"All that certain lot or parcel of land in the Eastern Suburbs of the town of Suffolk, Virginia, in the plat of building lots known as West Jericho and described as follows:

Beginning at a point on the North side of Rail Road Avenue in said West Jericho, Eighty (80) feet east of the Northwest corner of said Rail Road Avenue and Third Street in said West Jericho, and running thence Easterly and fronting on said Railroad Avenue Forty (40) feet; thence Northerly and at right angles to said Rail Road Avenue and in a line parallel with said Third Street One Hundred and Twenty (120) feet; thence Westerly in a line parallel with said Rail Road Avenue Forty (40) feet, and thence running Southwardly in a straight line one hundred and twenty (120) feet to the beginning.

Being and constituting Lot No. 68, in said West Jericho, as per plat duly of record in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, in D.B. No.22, Page 306.

And is the same land conveyed to John Freeman by deed from Jno. F. Pinner and wife, bearing date the 30th day of December, 1890, and of record in said Clerk's Office in D.B. NO.25,page 89."

Amd being so seised and possessed of said real estate, sometime in the year 19____, the said John Freeman departed this life intestate, leaving the following living children:

Amy Freeman, who married Holliman, now deceased, Estella Freeman, who married William Clayton; and the following are the heirs-at-law and distributees of the deceased childfen of said John Freeman:

Your complainant, Adolphus Freeman, who married Sarah Whittaker, Nathaniel Freeman, an infant now eighteeen years of age, who were the children of Anthony Freeman, deceased, and Ida Freeman, wife of said Anthony Freeman; Estella Freeman, an infant now six years of age, a daughter of David Freeman, deceased, and Lena Freeman wife of the said David Freman; MinnieCooper, who married Robert Jones, George H. Cooper an infant now eighteen years of age, children of Mary J. Freeman, deceased, who married Romus Cooper; John N. Whirley, Royal Stephen Whirley, who were the children of Winnie Freeman, deceased, who married Stephen Whirley.

The foregoing are all the heirs-at-law and distributees of the said John Freeman; the said Nathaniel Freeman; Estellay Freeman and George Cooper are infants under twenty-years of age.

And your orator further states that the said real estate is not susceptible to partition among the parties entitled thereto, and if it cannot be so divided then your orator

desires the same to be sold and the proceeds divided among the adults and the infant parties according to their respective rights; the shares of the infants to be held as directed by the statute in such cases made and provided.

Should the propetty not be divisable in kind, your complainant believes, and here states, that the interest of those entitled to said real estate or its proceeds, will be promoted by a sale of the whole of the same or by allotment of part and a sale of the residue since the property is depreciating in value and now needs repairs to the building on said lot, and no one has sufficient interest in said property to make the repairs which are now necessary in order to keep the property from wreck and ruin.

Forasmuch, therefore, as your orator is remediless in the premises save By a Court of Equity, he prays that the said Amy Holliman, Ida Freeman, Adolphus Freeman, Sarah Freeman, Lena Freeman, Romus Cooper, Nathaniel Freeman, Estella Freemanand George Cooper, the last three being infants under twenty-one years of age, may be made parties defendant to this bill, and be required to answer same, but not on oath, oath being hereby waived, the said adults in their own proper person and the infants by a guardian ad litem; that a proper guardian ad litem be appointed in this suit, who shall answer this bill; that proper process may issue; that said real estate be divided to the proper persons or else it be sold and the proceeds divided in case it is indivisable.

That all proper orders and decrees may be made; that all accounts made and inquiries directed, and that all such other further and general relief as in the premises may be just and right may be granted.

Notice is hereby given that the Court will be asked to allow a reasonable counsel's fee to the attorneys for the complainant for their services in this cause.

And your complainant will ever pray, etc.

Adolphus Freeman.

Lewis and Harris
p.q.

Adolphus Freeman

vs. In Chancery

Amy Hallinan et als

Bill

1920. June 26. Filed.

J. A. M.

LEWIS & HARRIS
COUNSELLORS AT LAW
LAW BUILDING
SUFFOLK, VIRGINIA