

1925-001
Nansemond Co (Suffolk)

Chancery Causes: Floy S. Saunders, gdn vs Richard Henry Saunders, Jr infant et al

Holland, Beale, Cross, Cutchin, Howell, Davidson, Bradshaw, Everett, Smith, Jones, Bynum

Folder 1 of 2

Writing trust deed	5.00
Recording deed	5.90
Trust deed	5.15
Assurance on bonds	1.75
	17.80
	10.20
	28.00

Davidson

5.00
1.50
3.70
10.20

$$\begin{array}{r}
 23 \\
 \underline{5} \\
 115 \\
 \underline{40} \\
 1.75
 \end{array}$$

$$\begin{array}{r}
 12 \\
 \underline{3} \\
 60
 \end{array}$$

$$\begin{array}{r}
 1.20 \\
 1.50 \\
 \underline{1.00} \\
 3.70 \\
 1.50 \\
 \underline{5.00} \\
 10.20
 \end{array}$$

15.00

1.50

31

16.81

3361.25

3378.06

1126.12

2252.04

J. O. & Peter Davidson

12,200

600.

756.40

120

12,956.40

12

400.00

732

12,556.40

24.40
756.40

20.00

4.00

40

24.40

159 3/12,956.40

4,318.80

8639.60

Nov. 8, 1924:

All deeds in connection with R. H. Saunders
estate this day mailed to Mrs. Floy S. Saunders.
See letter filed in suit of Saunders' Gdn.
vs. Saunders' Infant et als.

MR E. Rank Story, Col
TO G. E. BUNTING, CLERK CIRCUIT COURT
OF NANSEMOND COUNTY
SUFFOLK, VA..

1921-9-2

TAX, \$ 20 TRANSFER, \$ 100 FEE, \$ 150

RECORDING

DEED FORM

B. V. S.
Anderson

TO

Walter 150
J. Q. & Peter
Jett H. Anderson

5.20

Paid

Sept 6th

1921

Reuben N. Bunting, Clerk

Courtland, Va., March 24, 1922

Mrs. Richard H. Saunders,
Holland, Va.

Dear Mrs. Saunders:

I have examined the Davidson papers,
and find that the last receipt Mr. Saunders
gave Mr. Davidson reads as follows:

"Received of James O. Davidson, \$1000.00
on principal on farm contract in addition to
interest and taxes, leaving a balance of
\$3761.25 this Dec. 1, 1919.

(Signed) R. H. Saunders,
Holland, Va."

Therefore, when settlement was made, Mr.
Davidson owed interest on \$3761.25 from Dec. 1,
1920 to Jan. 1st, 1921, the date of the bonds,
he having paid you one year's interest, or in-
terest to Sep. 1st, 1920. This explains the
difference of \$16.81 which Mr. Davidson did not
understand and I will be glad if you will advise
him concerning this.

Very truly yours,

Lic. EFS/RMO:

 * Saunders, Gdn. *
 * vs. *
 * Saunders, et als. *
 * and Davidson *

STATEMENT OF COSTS:

Amount paid Clerk,	10.00
Paid sheriff for serving summons	9.00
Fee of Comr. in Chancery,	10.00
Internal revenue on deed,	3.50
Fee allowed E. Frank Story, Atty. by the Court,	<u>150.00</u>
	\$182.50

Franklin, Va., June 10, 1921.

Mr. J. O. Davidson,

Holland, Va.

Dear Sir:

Mr. Story has just received a message calling him to Goldsboro, and he is leaving here this afternoon, and cannot get back home until Sunday morning. Therefore, I write to say that it is not necessary for you to come here to-morrow, as requested in Mr. Story's letter of yesterday.

He will let you hear from him again in a very few days.

Very truly yours,

Stenographer

Dic. EFS/RMO:

Franklin, Va., June 9, 1921.

Mr. J. O. Davidson,
Holland, Va.

Dear Sir:

I write to ask that you please meet me at my office in Franklin on next Saturday, June 11th. at about 2 o'clock p. m. I desire to see you in connection with the Saunders matter.

Very truly yours,

Dic. EFS/RMO:

Floy S. Saunders, Guardian for
Richard Henry Saunders, Jr., an
infant under the age of twenty-one
years,

vs.

Richard Henry Saunders, Jr., an in-
fant under the age of twenty-one years,
J. O. Davidson, Peter Davidson, Floy S.
Saunders, Josie Holland, Stella Beale,
Lucy S. Cross, A. H. Saunders, S. E.
Saunders, Minnie Cutchin, Cable Howell,
H. P. Saunders and J. P. Saunders.

Spa. in Chancery to Second December Rules, 1920.

Please appoint John C. Parker, Jr., Guardian ad
Litem to the infant defendant.

Direct summons for Josie Holland and Stella Beale
to the Sheriff of Southampton County.

Mail summons for J. O. Davidson and Peter Davidson
to E. Frank Story, Franklin, Va.

p. q.

Franklin, Va., Dec. 6, 1920.

Mr. June Davidson,

Holland, Va,

Dear Sir:

I am writing to request you to please meet me at my office in Franklin on next Wednesday, Dec. 8th, at about 10 o'clock a. m., and be sure to bring with you your contract made with R. H. Saunders for the sale of land prior to his death.

I am making this request in order that I may get a copy of the contract for the purpose of getting your deed. This is very important, please do not fail to come and bring the contract.

Very truly yours,

Dic. EWS/RIO:

Franklin, Va., Dec. 3, 1920.

Mrs. Floy S. Saunders,

Holland, Va.

Dear Mrs. Saunders:

I told you that I would write the parties who hold the contracts for the sale of the two tracts of land, to meet me in Holland one day this week. As a matter of fact, it is practically impossible for me to get out of Franklin in my car, either by way of South Quay or across the bridge at Franklin, and hence I am writing the parties to come to Franklin next Wednesday morning, at which time I can get copies of the contracts, and I will let you hear from me just as soon as I have gotten these copies.

Very truly yours,

Dic. EWS/RMO:

Jackson Oak Tavern

Sold to Davidson Brothers under
contract +

\$500.

June Davidson
R # 1, Holland, Va

These deeds compass
the Deeds of men.

E. FRANK STORY
ATTORNEY AT LAW
COURTLAND, VIRGINIA
BRANCH OFFICE AT FRANKLIN, VIRGINIA

CHANCERY SUMMONS

The Commonwealth of Virginia.

Out of Court
TO THE SHERIFF OF NANSEMOND COUNTY---GREETING:

You are Hereby Commanded to Summon Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years, J. O. Davidson, Peter Davidson,
Floy S. Saunders, Josie Holland, Stella Beale, Lucy S. Cross, A. H. Saunders,
S. E. Saunders, Minnie Cutchins, Gabie Howell, H. P. Saunders and J. P. Saunders.

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 December 1920, to answer

Bill in Chancery, exhibited against them

in the said Court by Floy S. Saunders, Guardian for Richard Henry Saunder, Jr.,
an infant under the age of twenty-one years

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this 16th day of
December, 1920, in the 15th year of the Commonwealth

A Copy Teste:

Clerk

Teste:

Clerk

Executed this 18 day of Dec., 1920 by delivering a true copy of the with-

in process to Algie H. Saunders and
Minnie Cutcher

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

J. L. Harcum Sheriff

Original

E. Frank Story-----P. q.

Floy S. Saunders, Guardian,

vs. } In Chancery

Richard Henry Saunders, Jr.,
an infant et als

1920

December Rules

Third Monday.

NANSEMOND COUNTY COURT,

Process Book, No. 3

Page

I hereby acknowledge due and legal service of the within summons.

A. H. Saunders

Due and legal service of the within summons is hereby acknowledged.

J. O. DAVIDSON
PETER DAVIDSON

By [Signature]

Their Atty.

CHANCERY SUMMONS

The Commonwealth of Virginia.

Sh of Nant
TO THE SHERIFF OF NANSEMOND COUNTY---GREETING:

You are Hereby Commanded to Summon... Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years, Floy S. Saunders, Josie Holland,
Stella Beale, Lucy S. Cross, A. H. Saunders, Minnie Cutchins, Gabie Howell,
S. E. Saunders, H. P. Saunders and J. P. Saunders.

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 December¹⁹²⁰..., to answer... a...

Bill in Chancery, exhibited against... them...

in the said Court by... Floy S. Saunders, Guardian for Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this... 16th... day of
December..., 1920, in the 135th year of the Commonwealth.

A Copy: Teste:

Clerk }

Teste:

Clerk

Executed this 18 day of Dec., 1918 by delivering a true copy of the with-

in process to Algie H. Saunders and IT
Minnie Cutchin

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

J. L. Harvill Sheriff

Oregon

E. Frank Story p. q.

Alg. H. Saunders and

vs. } In Chancery

Richard Henry Saunders, Jr.

1920

Dec. Rules

April Monday.

NANSEMOND COUNTY COURT,

Process Book, No.

Page

I hereby acknowledge due and legal service of the within summons.

U. H. Saunders

CHANCERY SUMMONS

The Commonwealth of Virginia.

Southampton
TO THE SHERIFF OF NANSEMOND COUNTY--GREETING:

You are Hereby Commanded to Summon... Richard Henry Saunders, Jr.,

an infant under the age of twenty-one years, J.O. Davidson, Peter Davidson,

Floy S. Saunders, Josie Holland, Stella Beale, Lucy S. Cross, A. H. Saunders,

S. E. Saunders, Minnie Cutchins, Gabie Howell, H. P. Saunders and J. P. Saunders

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 December¹⁹²⁰, to answer... a...

Bill in Chancery, exhibited against... them...

in the said Court by... Floy S. Saunders, Guardian of Richard Henry Saunders, Jr.,

an infant under the age of twenty-one years.

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this... 16th... day of

December, 1920, in the 145th year of the Commonwealth.

A Copy---Teste:

Clerk }

Teste:

Clerk

Executed this _____ day of _____, 191_____ by delivering a true copy of the with-

in process to _____

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

Sheriff

Original

E. Frank Story	p. q.
Floy S. Saunders, Guardian	
vs. } In Chancery	
Richard Henry Saunders, Jr., an infant et als	
19	
Rules	
Monday.	
NANSEMOND COUNTY COURT,	
Process Book, No.	
Page	

Executed in Southampton County, Virginia, this the 18th, day of December, 1920, by delivering a true copy hereof, to Stella Beale, in person.

As to Josie Holland, not finding her, nor any member of her family on whom same could be served, I executed in my County, as aforesaid, by posting a true copy hereof for Josie Holland, on the front door of her usual place of abode in the said County, this 18th, day of December, 1920.

C. L. Grayson Sheriff.

CHANCERY SUMMONS

The Commonwealth of Virginia.

TO THE SHERIFF OF NANSEMOND COUNTY---GREETING:

You are Hereby Commanded to Summon Richard Henry Sanders, Jr.,
an infant under the age of twenty-one years, J.O. Davidson, Peter Davidson,
Floy S. Sanders, Josie Holland, Stella Beale, Lucy S. Cross, A.H. Sanders,
S.E. Sanders, Minnie Cutchins, Gabie Howell, H.P. Sanders and J.P. Sanders.

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 December, 1920, to answer a
Bill in Chancery, exhibited against them

in the said Court by Floy S. Sanders, Guardian for Richard Henry Sanders, Jr.,
an infant under the age of twenty-one years

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this 16th day of
December, 1920, in the 1345th year of the Commonwealth.

A Copy--Teste:

Clerk

Teste:

Clerk

Executed on the 17 day of
Dec. 1920 within the county of
Nansemond, by delivering a
true copy of the within process.

in writing, to Floy S
Saunders in person
E.B. Rawler
Sheriff of Nansemond County.

Executed on the 17 day of
Dec. 1920 within the county of
Nansemond, by delivering a
true copy of the within process.

in writing, to Lucy S
Cross in person
E.B. Rawler
Sheriff of Nansemond County.

Executed on the 17 day of
Dec. 1920 within the county of
Nansemond, by delivering a
true copy of the within process.

in writing, to S.E.
Saunders in person
E.B. Rawler
Sheriff of Nansemond County.

Executed on the 17 day of
Dec. 1920 within the county of
Nansemond, by delivering a
true copy of the within process.

in writing, to Gabie
Howell in person
E.B. Rawler
Sheriff of Nansemond County.

Executed on the 17 day of
Dec. 1920 within the county of
Nansemond, by delivering a
true copy of the within process.

in writing, to H.P. Saunders
in person
E.B. Rawler
Sheriff of Nansemond County.

Executed on the 17 day of
Dec. 1920 within the county of
Nansemond, by delivering a
true copy of the within process.

in writing, to J.P.
Saunders in person
E.B. Rawler
Sheriff of Nansemond County.

Original

E. Frank Story p. q.

Floy S. Saunders, Guardian

vs. } In Chancery

Richard Henry Saunders, Jr.,
an infant et als.

19

Rules

Monday.

NANSEMOND COUNTY COURT,

Process Book, No.

Page

Executed this day of , 191 by delivering a true copy of the with-
in process to
in person, in the County of Nansemond, State of Virginia.
Sheriff

CHANCERY SUMMONS

The Commonwealth of Virginia.

TO THE SHERIFF OF NANSEMOND COUNTY---GREETING:

You are Hereby Commanded to Summon Richard Henry Harrison, Jr.,

an infant under the age of twenty-one years, J. B. Harrison, Peter Harrison,
Wm. B. Harrison, Jacob Hall and Charles Hall, Ray A. Brown, J. B. Harrison,
J. B. Harrison, Charles Harrison, Public Heirs of J. B. Harrison and J. B. Harrison

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 13th Monday in January 1920, to answer

Bill in Chancery, exhibited against J. B. Harrison

in the said Court by Wm. B. Harrison, Sheriff of District of Nansemond County, Jr.,

an infant and a the age of twenty-one years.

And have then and there this summons.

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

January, 1920, in the 13th year of the Commonwealth.

A Copy---Teste:

G. E. Bunting

Clerk

Teste:

G. E. Bunting

Clerk

Executed this _____ day of _____, 191____ by delivering a true copy of the with-

in process to _____

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

Sheriff

✓
a copy for
Richard Henry Saunders, Jr.
an infant

P. q.

vs. } In Chancery

19_____

Rules

Monday.

NANSEMOND COUNTY COURT,

Process Book, No. _____

Page _____

December 17, 1920

I hereby acknowledge due and legal service of the
within summons.

John C. Parker, Jr.

Guardian ad litem for Richard
Henry Saunders, Jr., Infant.

CHANCERY SUMMONS

The Commonwealth of Virginia.

TO THE SHERIFF OF NANSEMOND COUNTY---GREETING:

You are Hereby Commanded to Summon Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years, Floy S. Saunders, Josie Holland,
Stella Beale, Gabie Howell, Lucy S. Cross, A. H. Saunders, Minnie Cutchins,
S. E. Saunders, H. P. Saunders and J. P. Saunders

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 December, ¹⁹²⁰, to answer a

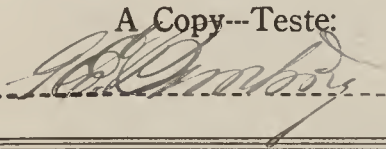
Bill in Chancery, exhibited against them

in the said Court by Floy S. Saunders, Guardian for Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years

And have then and there this summons.

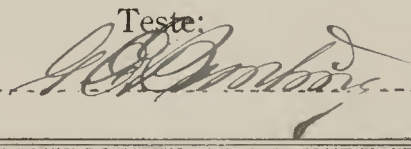
Witness. G. E. Bunting, Clerk of our said Court, at his office, this 16th day of
December, 1920, in the 135th year of the Commonwealth.

A Copy---Teste:



Clerk

Teste:



Clerk

Executed this _____ day of _____, 191____ by delivering a true copy of the with-

in process to _____

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

Sheriff

74
A copy for
Richard Henry Saunders,
an infant.
C. Parker, Jr. p. q.

vs. } In Chancery

19

Rules

Monday.

NANSEMOND COUNTY COURT,

Process Book, No. _____

Page _____

December 17, 1920

I hereby acknowledge due and legal service of the
within summons.

John C. Parker, Jr.

Guardian ad litem for Richard Henry Saunders, Jr.,
Infant.

CHANCERY SUMMONS

The Commonwealth of Virginia.

Southampton
TO THE SHERIFF OF NANSEMOND COUNTY--GREETING:

You are Hereby Commanded to Summon Richard Henry Saunders, Jr.,

an infant under the age of twenty-one years, Floy S. Saunders, Josie
Holland, Stella Beale, Lucy S. Cross, A. H. Saunders, Minnie Cutchins, Gabie
Howell, S. E. Saunders, H. P. Saunders and J. P. Saunders.

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 December, 1920, to answer a
Bill in Chancery, exhibited against them

in the said Court by Floy S. Saunders, Guardian for Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this 16th day of
December, 1920, in the 135th year of the Commonwealth

A Copy--Teste:

Clerk }

Teste:

G. E. Bunting
Clerk

Executed this _____ day of _____, 191____ by delivering a true copy of the with-

in process to _____

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

Sheriff

ORIGINAL

-----F. Frank Story,-----P. q.

-----Floy S. Saunders, Guardian-----

vs. } In Chancery

-----Richard Henry Saunders, Jr.,
infant et als-----

19.20-----

-----December-----Rules

-----Third-----Monday.

NANSEMOND COUNTY COURT,

Process Book, No.-----

Page-----

Executed in Southampton County, Virginia, this the 18th, day of December, 1920, by delivering a true copy hereof, to Stella Beale in person.

As to Josie Holland, not finding her, nor any member of her family on whom same could be served, I executed in my County, as aforesaid, by posting a true copy hereof for Josie Holland, on the front door of her usual place of abode in the said County, this 18th, day of December, 1920.

C. L. Grizzard. Sheriff.

CHANCERY SUMMONS

The Commonwealth of Virginia.

TO THE SHERIFF OF NANSEMOND COUNTY--GREETING:

You are Hereby Commanded to Summon... Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years, Floy S. Saunders, Josie Holland,
Stella Beale, Lucy S. Cross, A. H. Saunders, Minnie Cutchins, Gabie Howell,
S. E. Saunders, H. P. Saunders and J. P. Saunders

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 December 1920, to answer a
Bill in Chancery, exhibited against them

in the said Court by Floy S. Saunders, Guardian for Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this 16th day of
December, 1920, in the 145th year of the Commonwealth.

A Copy--Teste:

Clerk

Teste:

Clerk

Executed on the 17 day of
Dec. 1920 within the county of
Nansemond, by delivering a
true copy of the within process,
in writing, to *Floy S*
Simons in person
E B Rawls
Sheriff of Nansemond County.

Executed on the 17 day of
Dec. 1920 within the county of
Nansemond, by delivering a
true copy of the within process,
in writing, to *Lucy S*
Cross in person
E B Rawls
Sheriff of Nansemond County.

Executed on the 17 day of
Dec. 1920 within the county of
Nansemond, by delivering a
true copy of the within process,
in writing, to *S E Saunders*
in person
E B Rawls
Sheriff of Nansemond County.

Executed on the 17 day of
Dec 1920 within the county of
Nansemond, by delivering a
true copy of the within process,
in writing, to *Gobie*
Howell in person
E B Rawls
Sheriff of Nansemond County.

Executed on the 17 day of
Dec 1920 within the county of
Nansemond, by delivering a
true copy of the within process,
in writing, to *H P*
Saunders in person
E B Rawls
Sheriff of Nansemond County.

Executed on the 17 day of
Dec 1920 within the county of
Nansemond, by delivering a
true copy of the within process,
in writing, to *J P*
Saunders in person
E B Rawls
Sheriff of Nansemond County.

ORIGINAL

E. Frank Story P. Q.

Floy S. Saunders, Guardian,

vs. } In Chancery

Richard Henry Saunders, an infant
et als.

1920

December Rules

Third Monday.

NANSEMOND COUNTY COURT,

Process Book, No

Page

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

in process to

Executed this day of , 191 by delivering a true copy of the with-

Sheriff

VIRGINIA: IN THE CIRCUIT COURT OF HANSELOM COUNTY:

* Saunders, Gdn. *

* *

* vs. *

* *

* Saunders et als. *

* and Davidson *

* *

REPORT OF SPECIAL COMMISSIONER:

TO THE HONORABLE JAMES L. McFARLANE, JUDGE OF THE SAID COURT:

The undersigned, Special Commissioner appointed by a decree entered in this cause on the 27th day of June, 1921, for the specific purposes set out in the said decree, begs leave to report:

That in obedience to the directions contained in the said decree he, your said Special Commissioner, caused to be executed by the purchasers of the property in this cause mentioned and described, a certain deed of trust on the said property, securing the sum of \$3378.06, the amount due for the purchase price of the said real estate, evidenced by two certain bonds, one for the principal sum of \$1126.02, representing one-third of the purchase price, made payable to Mrs. Floy S. Saunders, (widow of Richard H. Saunders, deceased, representing her one-third dower interest in the said funds), the other bond for the principal sum of \$2252.04, representing the remaining two-thirds of the purchase price of the said property, made payable to Floy S. Saunders, Guardian for Richard H. Saunders, Jr., both of said bonds bearing legal interest from the 1st day of January, 1921, payable on demand, which said two bonds were delivered to the said Floy S. Saunders in her personal right and as Guardian of Richard H. Saunders, Jr., aforesaid, respectively, receipts therefor having been taken and same being herewith filed as a part of this report.

That upon the execution of the aforesaid trust deed and two bonds by the purchasers, J. O. Davidson and Peter Davidson, the Special Commissioner executed to them a deed for the said property, with special warranty of title, which said deed and trust deed have

been duly recorded in the Clerk's Office of the Circuit Court of Hansemond County, Virginia, as evidenced by receipts of G. E. Bunting, Clerk, also herewith filed as a part of this report.

Your Commissioner further reports that the said Floy S. Saunders, in her individual right and as Guardian aforesaid, has paid to him the sum of \$182.50, representing the fee allowed him by the Court and the costs of this suit, all of which has been distributed as follows:

To G. E. Bunting, Clerk, his costs,	\$10.00
" Sheriff costs for serving summons,	9.00
" M. Anderson Maxey, Comr. in Chancery,	10.00
" Internal revenue on deed	3.50
" E. Frank Story, Atty. fee allowed by the Court,	150.00
Making a total of,.....	<u>\$182.50</u>

All of which said doings and transaction were had and done in accordance with the specific directions contained in the aforesaid decree of June 27th, 1921.

Respectfully submitted this 30th day of September, 1921.

SPECIAL COMMISSIONER

VIRGINIA: IN THE CIRCUIT COURT OF NANSEMOND COUNTY:

* Saunders, Gdn. *
* *
* vs. *
* *
* Saunders et als. *
* and Davidson *
* *

REPORT OF SPECIAL COMMISSIONER:

TO THE HONORABLE JAMES L. McLEMORE, JUDGE OF THE SAID COURT:

The undersigned, Special Commissioner appointed by a decree entered in this cause on the 27th day of June, 1921, for the specific purposes set out in the said decree, begs leave to report:

That in obedience to the directions contained in the said decree he, your said Special Commissioner, caused to be executed by the purchasers of the property in this cause mentioned and described, a certain deed of trust on the said property, securing the sum of \$3378.06, the amount due for the purchase price of the said real estate, evidenced by two certain bonds, one for the principal sum of \$1126.02, representing one-third of the purchase price, made payable to Mrs. Floy S. Saunders, (widow of Richard H. Saunders, deceased, representing her one-third dower interest in the said funds), the other bond for the principal sum of \$2252.04, representing the remaining two-thirds of the purchase price of the said property, made payable to Floy S. Saunders, Guardian for Richard H. Saunders, Jr., both of said bonds bearing legal interest from the 1st day of January, 1921, payable on demand, which said two bonds were delivered to the said Floy S. Saunders in her personal right and as Guardian of Richard H. Saunders, Jr., aforesaid, respectively, receipts therefor having been taken and same being herewith filed as a part of this report.

That upon the execution of the aforesaid trust deed and two bonds by the purchasers, J. O. Davidson and Peter Davidson, the Special Commissioner executed to them a deed for the said property, with special warranty of title, which said deed and trust deed have

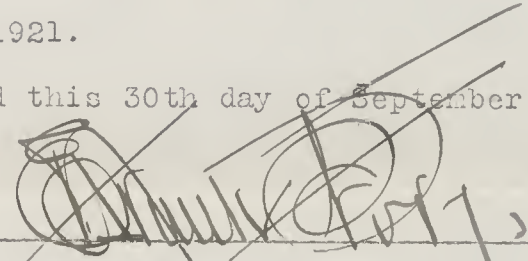
been duly recorded in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, as evidenced by receipts of G. E. Bunting, Clerk, also herewith filed as a part of this report.

Your Commissioner further reports that the said Floy S. Saunders, in her individual right and as Guardian aforesaid, has paid to him the sum of \$182.50, representing the fee allowed him by the Court and the costs of this suit, all of which has been distributed as follows:

To G. E. Bunting, Clerk, his costs,	\$10.00
" Sheriff costs for serving summons,	9.00
" M. Anderson Maxey, Comr. in Chancery,	10.00
" Internal revenue on deed	3.50
" E. Frank Story, Atty. fee allowed by the Court,	150.00
Making a total of,.....	\$182.50

All of which said doings and transaction were had and done in accordance with the specific directions contained in the aforesaid decree of June 27th, 1921.

Respectfully submitted this 30th day of September, 1921.


SPECIAL COMMISSIONER

 * Saunders, Gdn. *
 *
 * vs. *
 *
 * Saunders et als. *
 * and Davidson *
 *

Received of E. Frank Story, Special Commissioner in the above styled suit, one certain bond for the sum of Eleven Hundred Twenty-Six & 02/100 (\$1126.02) Dollars, signed by J. O. Davidson and Peter Davidson, payable on demand with legal interest from the 1st day of January, 1921, and payable to me. Which said bond said Special Commissioner has delivered to me in accordance with the directions contained in a decree entered in the above styled cause on the 27th day of June, 1921.

Sept. 1, 1921

Mrs. Floy S. Saunders

 * Saunders, Gdn. *
 *
 * vs. *
 *
 ** Saunders et als. *
 * and Davidson *
 **

Received of E. Frank Story, Special Commissioner in the above styled suit, one certain bond for the sum of Twenty-Two Hundred Fifty-Two & 04/100 (\$2252.04) Dollars, signed by J. O. Davidson and Peter Davidson, payable on demand, with legal interest from the 1st day of January, 1921, to me as Guardian for Richard H. Saunders, Jr. Which said bond said Special Commissioner has delivered to me in accordance with the directions contained in a decree entered in the above styled cause on the 27th day of June, 1921.

Sept. 1-1921

Mrs. Floy S. Saunders

Guardian for Richard H.
 Saunders, Jr.

MR. *E. Bank Story*
TO G. E. BUNTING, CLERK CIRCUIT COURT
OF NANSEMOND COUNTY
SUFFOLK, VA..

192

TAX, \$ 340 TRANSFER, \$ 100 FEE, \$ 125

War tax 350

RECORDING

B & W

DEED FORM

E. Bank

Story, Sec. Com. TO J. O. & Peter Davidson

9 65\

Paid

Sept 6th

192

1 *Henry N. Bunting* Clerk

MR G. Bank Story, City
TO G. E. BUNTING, CLERK CIRCUIT COURT
OF NANSEMOND COUNTY
SUFFOLK, VA..

1921-9-2

TAX, \$ 340 TRANSFER, \$ x FEE, \$ 2.00

5.50

RECORDING dp of DEED FORM J. O. & P. H.
Davidson TO G. Bank Story, Clerk

Paid

Sept 6th

1921

Ruby V. Bunting Clerk

Saunders, Gdw.

No. 3 Report of Spec. Comm.

Saunders et al. and
Davidson.

1925: Jan. 14. Filed
J.M.

E. FRANK STORY
ATTORNEY AT LAW
OFFICES
COURTLAND AND FRANKLIN
VIRGINIA

 * Saunders, Guardian *
 * *
 * vs. *
 * *
 * Saunders, et als. and *
 * Davidson. *
 * *

This day this cause came on to be further heard on the papers formerly read, and upon the report of Commissioner in Chancery, M. Anderson Maxey, filed on the _____ day of _____ 1921, reporting that it will be to the interest of the heirs of Richard H. Saunders, deceased that the real estate in the bill and proceedings in this cause mentioned and described, should be sold to J. O. Davidson and Peter Davidson, in accordance with the contract made and entered into by the said decedent, Richard H. Saunders, with the said purchasers prior to his death, to which report there is no exception, and was argued by counsel:

On consideration whereof, the Court doth approve and confirm the said report, and doth adjudge, order and decree that E. Frank Story be, and he is hereby appointed a Special Commissioner for the purpose of receiving from the said purchasers, the balance of the purchase price of the said real estate, which is generally described as follows:

First: "All that certain tract of land situated in Holy Neck Magisterial District, in the county of Nansemond and State of Virginia, containing about one hundred and twenty-five acres, more or less, and bounded as follows: On th north by the land of J. E. Vincent, on the east by the land of Henry Everett, on the south by the lands of Alfred and Henry Howell, and on the west by the lands of Jack and Arch Copeland and David Milteer."

Second: "All that certain tract of land, situated in Holy Neck Magisterial District, Nansemond County, Virginia, containing eleven acres, more or less, and bounded by the Everett Holland tract of land and the Jackson Peele tract of land, now owned by R. H. Saunders, and the David Milteer tract."

The amount of the unpaid balance ascertained to be due by the said purchasers as of January 1st, 1921, being the sum of

\$3,378.06, which said amount the said Special Commissioner is hereby authorized and directed to receive, and when the same is fully paid, that he execute to the said purchaser a deed, with special warranty of title, for the said real estate.

The Court doth further adjudge, order and decree that the said Special Commissioner be, and he is hereby authorized to receive in settlement of the aforesaid sum of \$3,378.06, the amount due for the purchase price of the said real estate, two bonds, to be executed by the said purchasers, one of said bonds to be for the sum of \$1,126.02, representing one-third of the aforesaid purchase price, same to be made payable to Mrs. Floy S. Saunders, (widow of Richard H. Saunders, deceased, representing her one-third dower interest in the said funds, which said funds are held by the Court to be a part of the personal property belonging to the estate of Richard H. Saunders, deceased); the other bond to be for the sum of \$2,252.04, representing the remaining two-thirds of the purchase price of the said property, made payable to Floy S. Saunders, Guardian for Richard H. Saunders, the remaining sold distributee of the estate of Richard H. Saunders, deceased, both of said bonds to bear legal interest from the 1st day of January, 1921, to be payable on demand, containing a waiver of the Homestead Exemption, and to be secured equally by a deed of trust to be executed by the said purchasers, in due form of law, on the real estate hereinbefore described, which said two bonds, the said Special Commissioner will forthwith, after the execution thereof, deliver to the obligees hereinbefore named, taking receipts therefor to be filed with the papers in this cause, and the said Special Commissioner will forthwith, after the execution of the deed of trust hereinbefore provided for, lodge both the deed and deed of trust with the Clerk of the Circuit Court of Nansemond County, Virginia, to be by him recorded, as required by law.

The Court doth further adjudge, order and decree that the costs of this suit and sale, including a fee of \$_____ to be paid to E. Frank Story, Attorney for his services in this cause, which said amount shall be in lieu of commissions of the Special Commissioner, the taxed attorneys fee and the writing of the aforesaid deed to the purchasers, (but not the trust deed, the expense of which shall be borne by the purchasers) shall be paid as follows:

One-third by Mrs. Floy S. Saunders, individually, and the remaining two-thirds by the said Mrs. Floy S. Saunders, Guardian of Richard Henry Saunders, and the said Guardian is hereby authorized to charge the amount thus paid by her in this behalf against her said ward in the regular course of her Guardian-ship account.

And it being evident that the said Special Commissioner will not receive any funds as Special Commissioner other than the costs of this suit, he shall not be required to execute a bond.

~~And the Commissioner will report to Court.~~

It being apparent to the Court that the aforesaid Guardian, Floy S. Saunders, has heretofore executed a bond as Guardian of her said ward, Richard Henry Saunders, in an amount sufficient to amply protect the funds directed to be paid her under this decree, it will not be necessary for her to execute an additional bond.

And the Commissioner will report to Court.

 * Saunders, Guardian *
 * *
 * vs. *
 * *
 * Saunders, et als. and *
 * Davidson. *
 * *

This day this cause came on to be further heard on the papers formerly read, and upon the report of Commissioner in Chancery, M. Anderson Maxey, filed on the 10 day of March 1921, reporting that it will be to the interest of the heirs of Richard H. Saunders, deceased that the real estate in the bill and proceedings in this cause mentioned and described, should be sold to J. O. Davidson and Peter Davidson, in accordance with the contract made and entered into by the said decedent, Richard H. Saunders, with the said purchasers prior to his death, to which report there is no exception, and was argued by counsel:

On consideration whereof, the Court doth approve and confirm the said report, and doth adjudge, order and decree that E. Frank Story be, and he is hereby appointed a Special Commissioner for the purpose of receiving from the said purchasers, the balance of the purchase price of the said real estate, which is generally described as follows:

First: "All that certain tract of land situated in Holy Neck Magisterial District, in the county of Nansemond and State of Virginia, containing about one hundred and twenty-five acres, more or less, and bounded as follows: On th north by the land of J. E. Vincent, on the east by the land of Henry Everett, on the south by the lands of Alfred and Henry Howell, and on the west by the lands of Jack and Arch Copeland and David Milteer."

Second: "All that certain tract of land, situated in Holy Neck Magisterial District, Nansemond County, Virginia, containing eleven acres, more or less, and bounded by the Everett Holland tract of land and the Jackson Peele tract of land, now owned by R. H. Saunders, and the David Milteer tract."

The amount of the unpaid balance ascertained to be due by the said purchasers as of January 1st, 1921, being the sum of

\$3,378.06, which said amount the said Special Commissioner is, here-
by authorized and directed to receive, *in prior deed of trust bonds as hereinafter provided* and when the same is fully so
paid, that he execute to the said purchaser a deed, with special
warranty of title, for the said real estate.

The Court doth further adjudge, order and decree that the
said Special Commissioner be, and he is hereby authorized to re-
ceive in settlement of the aforesaid sum of \$3,378.06, the amount
due for the purchase price of the said real estate, two bonds, to
be executed by the said purchasers, one of said bonds to be for the
sum of \$1,126.02, representing one-third of the aforesaid purchase
price, same to be made payable to Mrs. Floy S. Saunders, (widow of
Richard H. Saunders, deceased, representing her one-third dower
interest in the said funds, which said funds are held by the Court
to be a part of the personal property belonging to the estate of
Richard H. Saunders, deceased); the other bond to be for the sum
of \$2,252.04, representing the remaining two-thirds of the purchase
price of the said property, made payable to Floy S. Saunders, Guar-
dian for Richard H. Saunders, the remaining sold distributee of
the estate of Richard H. Saunders, deceased, both of said bonds
to bear legal interest from the 1st day of January., 1921, to be
payable on demand, containing a waiver of the Homestead Exemption,
and to be secured equally by a deed of trust to be executed by the
said purchasers, in due form of law, on the real estate hereinbe-
fore described, which said two bonds, the said Special Commissioner
will forthwith, after the execution thereof, deliver to the obli-
gees hereinbefore named, taking receipts therefor to be filed with
the papers in this cause, and the said Special Commissioner will
forthwith, after the execution of the deed of trust hereinbefore
provided for, lodge both the deed and deed of trust with the Clerk
of the Circuit Court of Nansemond County, Virginia, to be by him
recorded, as required by law.

The Court doth further adjudge, order and decree that the costs of this suit and sale, including a fee of \$ 150- to be paid to E. Frank Story, Attorney for his services in this cause, which said amount shall be in lieu of commissions of the Special Commissioner, the taxed attorneys fee and the writing of the aforesaid deed to the purchasers, (but not the trust deed, the expense of which shall be borne by the purchasers) shall be paid as follows:

One-third by Mrs. Floy S. Saunders, individually, and the remaining two-thirds by the said Mrs. Floy S. Saunders, Guardian of Richard Henry Saunders, and the said Guardian is hereby authorized to charge the amount thus paid by her in this behalf against her said ward in the regular course of her Guardian-ship account.

And it being evident that the said Special Commissioner will not receive any funds as Special Commissioner other than the costs of this suit, he shall not be required to execute a bond.

~~And the Commissioner will report to Court.~~

It being apparent to the Court that the aforesaid Guardian, Floy S. Saunders, has heretofore executed a bond as Guardian of her said ward, Richard Henry Saunders, in an amount sufficient to amply protect the funds directed to be paid her under this decree, it will not be necessary for her to execute an additional bond.

And the Commissioner will report to Court.

Saunders, Edw.

— R. 3 2nd Decree

Saunders et als.
and Davidson

Enter June 27. 1921

J. L. McInnis.

J. —————

#. 5- 715 351

E. FRANK STORY
ATTORNEY AT LAW
OFFICES
COURTLAND AND FRANKLIN
VIRGINIA

COMMISSIONER'S REPORT.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

Floy S. Saunders, Guardian
for Richard Henry Saunders,
Jr. Complainant,

v.

Richard Henry Saunders, Jr., an
infant under the age of twenty-one
years, J. O. Davidson, Peter David-
son, Floy S. Saunders, Josie Holland,
Stella Beale, Lucy S. Cross, A. H.
Saunders, S. F. Saunders, Minnie
Cutchin, Gabie Howell, M. P. Saunders
and J. P. Saunders. Defendants.

Commissioner's Office,

Suffolk, Virginia, March 4, 1921.

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

In pursuance of a decree of your Honor's court, entered
in the suit of which the above is the general style, on the 22nd
day of January, 1921, I gave notice to the parties that on the
23rd day of February, 1921, at 3:30 o'clock, p.m., and at the
offices of James H. Corbitt, Attorney at Law, National Bank
Building, in the City of Suffolk, Virginia, I should proceed to
execute the said decree. The said notice, with service of
same, is herewith returned.

I attended at the time and place so appointed and took the
depositions of Joe E. Holland, H. T. Jones, and J. W. Smith.
The said depositions are returned herewith. After consideration
of the same, together with the pleadings in the cause, I
respectfully report:-

1. That the infant defendant, Richard Henry Saunders,
Jr. is possessed or entitled, subject to the dower of his mother,
Floy S. Saunders, to the following described real estate in

Nansemond County, Virginia:

First: "All that certain tract of land situated in Holy Neck Magisterial District, in the county of Nansemond and State of Virginia, containing about one hundred and twenty-five acres, more or less and bounded as follows: On the north by the land of J. F. Vincent, on the east by the land of Henry Everett, on the south by the lands of Alfred and Henry Howell, and on the west by the lands of Jack and Arch Copeland and David Milteer."

It being the same tract or parcel of land conveyed to the said Richard H. Saunders, by John Bradshaw and wife, by their deed bearing date the 23rd day of November, 1914, and of record in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, in Deed Book No. 80, at page 359.

Second: "All that certain tract of land, situated in Holy Neck Magisterial District, Nansemond County, Virginia, containing eleven acres, more or less, bounded by the Everett Holland tract of land and the Jackson Peele tract of land, now owned by R.H. Saunders, and the David Milteer tract."

It being the same tract or parcel of land conveyed to the said R. H. Saunders by S. F. Everett and wife, by their deed bearing date the 21st day of November, 1916, and of record in the aforesaid Clerk's Office in Deed Book No. 84, at page 553.

The fee-simple value of the said real estate is \$5,500. Its annual value is \$200.

That in addition to his interest in the foregoing real estate, the said infant is seized and possessed in fee-simple, subject to the dower interest of his mother, of certain real estate lying situate and being in Nansemond County, Virginia, the estimated value of which, as a whole, that is, including the dower interest of his mother, Floy S. Saunders, is about \$40,000.00 and consists:

First: Of those three certain lots, tracts or parcels of land fully set forth and described in a certain bill in Chancery filed in a certain suit now pending in your Honor's Court, generally styled, Saunders, Guardian vs. Saunders et als., reference

to which is hereby generally and specially made for a full and accurate description of the said real estate:

Second: That certain other tract or parcel of land fully set forth and described in the bill of complaint filed in another certain suit in equity, now pending in your Honor's Court, generally styled, Saunders, Guardian vs. Saunders et als. and Bynum, reference to which said bill of complaint is hereby generally and specially made for a full and accurate description of the said property:

Third: An undivided one-third interest, subject to the lien of a certain trust deed, in a certain tract or parcel of land fully set forth and described in the bill of complaint filed in another certain suit in equity now pending in your Honor's Court, generally styled, Saunders, Guardian et als. vs. Saunders et als., reference to which is hereby generally and specially made for a full and accurate description of the said property.

That the said infant has personal property of the approximate value of \$5000.00, and that he has no other property.

2. The interest of the said infant defendant will be promoted by a sale of the real estate in the bill mentioned, or any part thereof, and an investment of the proceeds of sale in other property.

3. That the rights of no person will be violated by such sale and investment.

4. That the following aunts and uncles of the said infant defendant would be the heirs at law or distributees of the infant defendant if he were dead: Josie Holland, Stella Beale, Lucy S. Cross, Minnie Cutchin, Gabie Howell, A. H. Saunders, S. E. Saunders, H. P. Saunders and J. P. Saunders, and the same are properly before the Court.

5. That there are no liens for delinquent taxes, or otherwise, binding the said property.

6. That the sale of the said real estate on the terms and conditions set out in the contract made between Richard H. Saunders, and J. O. Davidson and Peter Davidson is a good and fair sale for the said property.

7. That there is no other matter deemed pertinent by the Commissioner, or required to be stated by any party in interest.

Respectfully submitted,

Commissioner in Chancery.

Landers

v.

Davidson

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA;

 * Floy S. Saunders, Guardian for *
 * Richard Henry Saunders, Jr. *
 * *
 * vs. *
 * *
 * Richard Henry Saunders, Jr., an in- *
 * fant under the age of twenty-one *
 * years, Tom Bynum, Floy S. Saunders, *
 * Josie Holland, Stella Beale, Lucy *
 * Cross, A. H. Saunders, Minnie Cutchin, *
 * Gabie Howell, S. E. Saunders, H. P. *
 * Saunders and J. P. Saunders. *
 * *

This day this cause, which has regularly matured at rules, according to law, came on to be heard on the bill of the complainant, verified by oath thereto, and exhibits therewith filed, the answer of John C. Parker, Jr., Guardian ad Litem, a discreet and competent attorney at law, duly assigned at rules, according to law, to defend the interest of the infant defendant, Richard Henry Saunders, Jr., this day filed by leave of court, and his own answer, on oath, to the bill of complaint, to which answers the complainant replies generally; the adult defendants, Tom Bynum, Floy S. Saunders, Josie Holland, Stella Beale, Lucy S. Cross, A. H. Saunders, Minnie Cutchin, Gabie Howell, S. E. Saunders, H. P. Saunders and J. P. Saunders, on whom process has been duly served, still failing to appear and plead, answer or demur, the said bill was taken for confessed as to them, and was argued by counsel:

On consideration whereof, the Court doth adjudge, order and decree that this cause be referred to one of the Commissioners of this Court who is directed to inquire and report to the Court as follows:

(1) Of what estate, real and personal, the infant defendant, Richard Henry Saunders, Jr., is possessed or entitled and what is his respective share or interest therein, where such estate is situated and what is its fee-simple and annual value:

(2) Whether the interest of the said infant defendant

will be promoted by a sale of the real estate in the bill mentioned, or any part thereof, and an investment of the proceeds of sale in other property:

(3) Whether the rights of any person will be violated by such sale and investment:

(4) Who would be the heirs at law or distributees of the infant defendants if he were dead, and whether all such persons are properly before the Court in this cause:

(5) Whether there are any liens for delinquent taxes, or otherwise, binding the said property:

(6) Whether the sale of the said real estate on the terms and conditions set out in the contract made between Richard H. Saunders, and Tom Bynum is a good and fair sale for the said property.

(7) Any other matter deemed pertinent by the commissioner, or required to be stated by any party in interest.

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA:

* Floy S. Saunders, Guardian *
* for Richard Henry Saunders, *
* Jr. *
* *
* vs. *
* *
* Richard Henry Saunders, Jr., an *
* infant under the age of twenty-one *
* years, J. O. Davidson, Peter David- *
* son, Floy S. Saunders, Josie Holland, *
* Stella Beale, Lucy S. Cross, A. H. *
* Saunders, S. E. Saunders, Minnie *
* Cutchin, Gabie Howell, H. P. Saunders *
* and J. P. Saunders. *
* *

This day this cause, which has regularly matured at rules, according to law, came on to be heard on the bill of the complainant, verified by oath thereto, and exhibits therewith filed, the answer of John C. Parker, Jr., Guardian ad Litem, a discreet and competent attorney at law, duly assigned at rules, according to law, to defend the interest of the infant defendant, Richard Henry Saunders, Jr., this day filed by leave of court, and his own answer, on oath, to the bill of complaint, to which answers the complainant replies generally; the adult defendants, J. O. Davidson, Peter Davidson, Floy S. Saunders, Josie Holland, Stella Beale, Lucy S. Cross, A. H. Saunders, Minnie Cutchin, Gabie Howell, S. E. Saunders, H. P. Saunders and J. P. Saunders, on whom process has been duly served, still failing to appear and plead, answer or demur, the said bill was taken for confessed as to them, and was argued by counsel:

On consideration whereof, the Court doth adjudge, order and decree that this cause be referred to one of the commissioners of this Court who is directed to inquire and report to the court as follows:

(1) Of what estate, real and personal, the infant defendant, Richard Henry Saunders, Jr., is possessed or entitled and

what is his respective share or interest therein, where such estate is situated and what is its fee-simple and annual value:

(2) Whether the interest of the said infant defendant will be promoted by a sale of the real estate in the bill mentioned, or any part thereof, and an investment of the proceeds of sale in other property:

(3) Whether the rights of any person will be violated by such sale and investment:

(4) Who would be the heirs at law or distributees of the infant defendant if he were dead, and whether all such persons are properly before the Court in this cause:

(5) Whether there are any liens for delinquent taxes, or otherwise, binding the said property:

(6) Whether the sale of the said real estate on the terms and conditions set out in the contract made between Richard H. Saunders, and J. O. Davidson and Peter Davidson is a good and fair sale for the said property.

(7) Any other matter deemed pertinent by the Commissioner, or required to be stated by any party in interest.

Saunders, Lee.

re. 1st Decree

Saunders et als. and
Davidson.

Enter Jan'y 22. 1921.
James L. McImore.

Chancery Order Book 5,
page 319.

E. FRANK STORY
ATTORNEY AT LAW
OFFICES
COURTLAND AND FRANKLIN
VIRGINIA

VIRGINIA: IN THE CIRCUIT COURT OF NANSEMOND COUNTY:

 * Saunders, Gdn. *
 * *
 * vs. *
 * *
 * Saunders et als. *
 * and Davidson *
 * *

This day this cause came on to be further heard on the papers formerly read, and upon the report of E. Frank Story, Special Commissioner appointed by a decree entered in this cause on the 27th day of June, 1921, which said report is in part as follows:

"That in obedience to the directions contained in the said decree he, your said Special Commissioner, caused to be executed by the purchasers of the property in this cause mentioned and described, a certain deed of trust on the said property, securing the sum of \$3378.06, the amount due for the purchase price of the said real estate, evidenced by two certain bonds, one for the principal sum of \$1126.02, representing one-third of the purchase price, made payable to Mrs. Floy S. Saunders, (widow of Richard H. Saunders, deceased, representing her one-third dower interest in the said funds) the other bond for the principal sum of \$2252.04, representing the remaining two-thirds of the purchase price of the said property, made payable to Floy S. Saunders, Guardian for Richard H. Saunders, Jr., both of said bonds bearing legal interest from the 1st day of January, 1921, payable on demand, which said two bonds were delivered to the said Floy S. Saunders in her personal right and as Guardian of Richard H. Saunders, Jr. aforesaid, respectively, receipts therefor having been taken and same being herewith filed as a part of this report.

That upon the execution of the aforesaid trust deed and two bonds by the purchasers, J. C. Davidson and Peter Davidson, the Special Commissioner executed to them a deed for the said property, with special warranty of title, which said deed and trust deed have been duly recorded in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, as evidenced by receipts of G. H. Bunting, Clerk, also herewith filed as a part of this report.

Your Commissioner further reports that the said Floy S. Saunders, in her individual right and as Guardian aforesaid, has paid to him the sum of \$182.50, representing the fee allowed him by the Court and the costs of this suit, all of which has been distributed as follows:

To G. H. Bunting, Clerk, his costs,	\$10.00
" Sheriff costs for serving summons,	9.00
" M. Anderson Maxey, Comr. in Chancery,	10.00
" Internal revenue on deed,	3.50
" E. Frank Story, Atty. fee allowed by the Court,	150.00
Making a total of,....	\$182.50

All of which said doings and transaction were had and done in accordance with the specific directions contained in the aforesaid decree of June 27th, 1921.

Respectfully submitted this 30th day of September, 1921.

(Signed) H. Frank Story
Special Commissioner."

This day filed by leave of Court, to which report there is no exception, and was argued by counsel:

On consideration whereof, the Court doth approve and confirm the said report, and it appearing that nothing further remains to be done in this cause, it is directed that same be removed from the docket.

Holland, Va.,

Jan. 23, 1918.

This is to certify that I R. H. Saunders and Floy Saunders have this day sold to J. O. Davidson and Peter Davidson for the sum of \$5500.00 the farm known as the Jackson Peele farm and the Silas Everett farm adjoining. And we hereby this day acknowledge the receipt of \$638.75 as part payment on said farm leaving to be paid \$4861.25 and interest from date. Taxes and insurance to be paid by said J. O. Davidson from date.

(Signed) R. H. Saunders

(Signed) Floy S. Saunders

Holland, Va., Feby. 10,-19

This is to certify that June O. Davidson has paid \$500.00 on the principle and the interest for 1 year on farm bought of me leaving a balance of \$4361.25 on the 23rd day of Jany. 1919, and interest from that date. I agree to give a deed & take a deed of trust for the above amount when demanded.

(Signed) . R. H. Saunders

Received of June O. Davidson \$1000.00 on principle
on farm contract in addition to interest and taxes,
leaving a balance of \$3361.25 this Dec. 1, 1919.

(Signed) R. H. Saunders,
Holland, Va.

Saunders, Guardian

-R-3 "Exhibit B"

Saunders et al. and

Davidson

E. FRANK STORY
ATTORNEY AT LAW
COURTLAND, VIRGINIA
BRANCH OFFICE AT FRANKLIN, VIRGINIA

COMMISSIONER'S REPORT.

VIRGINIA:

IN THE CIRCUIT COURT OF HANSMOND COUNTY.

Floy S. Saunders, Guardian
for Richard Henry Saunders,
Jr. Complainant,

v.

Richard Henry Saunders, Jr., an
infant under the age of twenty-one
years, J. C. Davidson, Peter David-
son, Floy S. Saunders, Josie Holland,
Stella Beale, Lucy S. Cross, A. H.
Saunders, S. F. Saunders, Minnie
Cutchin, Gabie Howell, H. P. Saunders
and J. P. Saunders. Defendants.

Commissioner's Office,

Suffolk, Virginia, March 4, 1921.

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

In pursuance of a decree of your Honor's court, entered
in the suit of which the above is the general style, on the 22nd
day of January, 1921, I gave notice to the parties that on the
23rd day of February, 1921, at 3:30 o'clock, p.m., and at the
offices of James H. Corbitt, Attorney at Law, National Bank
Building, in the City of Suffolk, Virginia, I should proceed to
execute the said decree. The said notice, with service of
same, is herewith returned.

I attended at the time and place so appointed and took the
depositions of Joe E. Holland, H. T. Jones, and J. W. Smith.
The said depositions are returned herewith. After consideration
of the same, together with the pleadings in the cause, I
respectfully report:-

1. That the infant defendant, Richard Henry Saunders,
Jr. is possessed or entitled, subject to the dower of his mother,
Floy S. Saunders, to the following described real estate in

Nansemond County, Virginia:

First: "All that certain tract of land situated in Holy Neck Magisterial District, in the county of Nansemond and State of Virginia, containing about one hundred and twenty-five acres, more or less and bounded as follows: On the north by the land of J. F. Vincent, on the east by the land of Henry Everett, on the south by the lands of Alfred and Henry Howell, and on the west by the lands of Jack and Arch Copeland and David Milteer."

It being the same tract or parcel of land conveyed to the said Richard H. Saunders, by John Bradshaw and wife, by their deed bearing date the 23rd day of November, 1914, and of record in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, in Deed Book No. 80, at page 359.

Second: "All that certain tract of land, situated in Holy Neck Magisterial District, Nansemond County, Virginia, containing eleven acres, more or less, bounded by the Everett Holland tract of land and the Jackson Peele tract of land, now owned by R. E. Saunders, and the David Milteer tract."

It being the same tract or parcel of land conveyed to the said R. E. Saunders by S. F. Everett and wife, by their deed bearing date the 21st day of November, 1916, and of record in the aforesaid Clerk's Office in Deed Book No. 84, at page 553.

The fee-simple value of the said real estate is \$5,500. Its annual value is \$200.

That in addition to his interest in the foregoing real estate, the said infant is seized and possessed in fee-simple, subject to the dower interest of his mother, of certain real estate lying situate and being in Nansemond County, Virginia, the estimated value of which, as a whole, that is, including the dower interest of his mother, Floy S. Saunders, is about \$40,000.00 and consists:

First: Of those three certain lots, tracts or parcels of land fully set forth and described in a certain bill in Chancery filed in a certain suit now pending in your Honor's Court, generally styled, Saunders, Guardian vs. Saunders et als., reference

to which is hereby generally and specially made for a full and accurate description of the said real estate:

Second: That certain other tract or parcel of land fully set forth and described in the bill of complaint filed in another certain suit in equity, now pending in your Honor's Court, generally styled, Saunders, Guardian vs. Saunders et als. and Bynum, reference to which said bill of complaint is hereby generally and specially made for a full and accurate description of the said property:

Third: An undivided one-third interest, subject to the lien of a certain trust deed, in a certain tract or parcel of land fully set forth and described in the bill of complaint filed in another certain suit in equity now pending in your Honor's Court, generally styled, Saunders, Guardian et als. vs. Saunders et als., reference to which is hereby generally and specially made for a full and accurate description of the said property.

That the said infant has personal property of the approximate value of \$5000.00, and that he has no other property.

2. The interest of the said infant defendant will be promoted by a sale of the real estate in the bill mentioned, or any part thereof, and an investment of the proceeds of sale in other property.

3. That the rights of no person will be violated by such sale and investment.

4. That the following aunts and uncles of the said infant defendant would be the heirs at law or distributees of the infant defendant if he were dead: Josie Holland, Stella Beale, Lucy B. Cross, Minnie Cutchin, Gabie Howell, A. H. Saunders, B. F. Saunders, H. P. Saunders and J. P. Saunders, and the same are properly before the Court.

5. That there are no liens for delinquent taxes, or otherwise, binding the said property.

6. That the sale of the said real estate on the terms and conditions set out in the contract made between Richard H. Saunders, and J. O. Davidson and Peter Davidson is a good and fair sale for the said property.

7. That there is no other matter deemed pertinent by
the Commissioner, or required to be stated by any party in interest.

Respectfully submitted,

M. Anderson Maxey
Commissioner in Chancery.

Commissioner's Fee (\$10.00)
pd. by E. Frank Story, Atty.
M. Anderson Maxey

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

To

Floy S. Saunders, Guardian
for Richard Henry Saunders,
Jr.....Complainant,

and

Richard Henry Saunders, Jr., an
infant under the age of twenty-one
years, J. O. Davidson, Peter David-
son, Floy S. Saunders, Josie Holland,
Stella Beale, Lucy S. Cross, A. H.
Saunders, S. E. Saunders, Minnie
Cutchin, Gabie Howell, H. P. Saunders
and J. P. SaundersDefendants.

You are hereby notified that on Wednesday, the 23rd day of February, 1921, at the offices of James H. Corbitt, Attorney at Law, National Bank Building, in the City of Suffolk, Virginia, at 3:30 o'clock, P.M., (at which time and place you are required to attend) I shall take, state and settle the following accounts which are to be taken, stated and settled and reported to Court in pursuance of a decree of the Circuit Court of Nansemond County, Virginia, rendered on the 22nd day of January, 1921, in the suit in Chancery pending in said Court, to which you are parties plaintiff and defendant, to-wit:

"(1) Of what estate, real and personal, the infant defendant, Richard Henry Saunders, Jr., is possessed or entitled and what is his respective share or interest therein, where such estate is situated and what is its fee-simple and annual value:

(2) Whether the interest of the said infant defendant will be promoted by a sale of the real estate in the bill mentioned, or any part thereof, and an investment of the proceeds of sale in other property:

(3) Whether the rights of any person will be violated

by such sale and investment:

(4) Who would be the heirs at law or distributees of the infant defendant if he were dead, and whether all such persons are properly before the Court in this cause:

(5) Whether there are any liens for delinquent taxes, or otherwise, binding the said property:

(6) Whether the sale of the said real estate on the terms and conditions set out in the contract made between Richard H. Saunders, and J. O. Davidson and Peter Davidson is a good and fair sale for the said property.

(7) Any other matter deemed pertinent by the Commissioner, or required to be stated by any party in interest."

Given under my hand as Commissioner in Chancery of said Court this 12th day of February, 1921.

M. Anderson Macey
Commissioner in Chancery.

Executed the within notice in Southampton County, Virginia, this 18th day of February, 1921, as follows:

As to the within named Josie Holland, by delivering a true copy hereof to her in person:

As to the within named Stella Beale, not finding her at her usual place of abode, I delivered a true copy hereof to Bernice Beale Herrin, a member of her family over the age of sixteen years, and explained to her the purport thereof.

C. L. Gizzard

Sheriff of Southampton County,
Virginia.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

To

Floy S. Saunders, Guardian
for Richard Henry Saunders,
Jr.....Complainant,

and

Richard Henry Saunders, Jr., an
infant under the age of twenty-one
years, J. O. Davidson, Peter David-
son, Floy S. Saunders, Josie Holland,
Stella Beale, Lucy S. Cross, A. H.
Saunders, S. F. Saunders, Minnie
Cutchin, Gabie Howell, H. P. Saunders
and J. P. SaundersDefendants.

You are hereby notified that on Wednesday, the 23rd
day of February, 1921, at the offices of James H. Corbitt,
Attorney at Law, National Bank Building, in the City of Suffolk,
Virginia, at 3:30 o'clock P.M., (at which time and place you
are required to attend) I shall take, state and settle the fol-
lowing accounts which are to be taken, stated and settled and
reported to Court in pursuance of a decree of the Circuit Court
of Nansemond County, Virginia, rendered on the 22nd day of
January, 1921, in the suit in Chancery pending in said Court, to
which you are parties plaintiff and defendant, to-wit:

"(1) Of what estate, real and personal, the infant defen-
dant, Richard Henry Saunders, Jr., is possessed or entitled and
what is his respective share or interest therein, where such estate
is situated and what is its fee-simple and annual value:

(2) Whether the interest of the said infant defendant
will be promoted by a sale of the real estate in the bill mention-
ed, or any part thereof, and an investment of the proceedings of
sale in other property:

(3) Whether the rights of any person will be violated

by such sale and investment:

(4) Who would be the heirs at law or distributees of the infant defendant if he were dead, and whether all such persons are properly before the Court in this cause:

(5) Whether there are any liens for delinquent taxes, or otherwise, binding the said property:

(6) Whether the sale of the said real estate on the terms and conditions set out in the contract made between Richard H. Saunders, and J. O. Davidson, and Peter Davidson is a good and fair sale for the said property.

(7) Any other matter deemed pertinent by the Commissioner, or required to be stated by any party in interest."

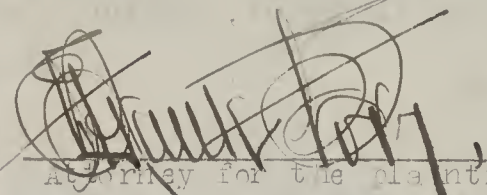
Given under my hand as Commissioner in Chancery of said Court this 12th day of February, 1921.

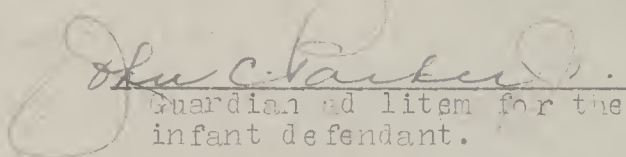
M. Anderson Mafey
Commissioner in Chancery.

Executed in the County of Lee of Wight
on this, 17th day of Feb, 1921. by delivering
true copies of the within to -
A. H. Saunders & Minnie Cutchin
in person.

W. H. Chapman Sheriff
By J. L. Harcum, D. S.

We hereby accept due and legal service of the within
notice.


Attorney for the plaintiff,
and adult defendants, J. C.
Davidson, Peter Davidson and
Floy S. Saunders.


Guardian ad litem for the
infant defendant.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

To

Floy S. Saunders, Guardian
for Richard Henry Saunders,
Jr.Complainant,

and.

Richard Henry Saunders, Jr., an
infant under the age of twenty-one
years, J. O. Davidson, Peter David-
son, Floy S. Saunders, Josie Holland,
Stella Beale, Lucy S. Cross, A. H.
Saunders, S. E. Saunders, Minnie
Cutchin, Gabie Howell, H. P. Saunders
and J. P. Saunders.....Defendants.

You are hereby notified that on Wednesday, the 23rd
day of February, 1921, at the offices of James H. Corbitt,
Attorney at Law, National Bank Building, in the City of Suffolk,
Virginia, at 3:30 o'clock, P.M., (at which time and place you
are required to attend) I shall take, state and settle the fol-
lowing accounts which are to be taken, stated and settled and
reported to Court in pursuance of a decree of the Circuit Court
of Nansemond County, Virginia, rendered on the 22nd day of
January, 1921, in the suit in Chancery pending in said Court, to
which you are parties plaintiff and defendant, to-wit:

"(1) Of what estate, real and personal, the infant defen-
dant, Richard Henry Saunders, Jr., is possessed or entitled and
what is his respective share or interest therein, where such estate
is situated and what is its fee-simple and annual value;

(2) Whether the interest of the said infant defendant
will be promoted by a sale of the real estate in the bill mention-
ed, or any part thereof, and an investment of the proceeds of sale
in other property:

(3) Whether the rights of any person will be violated

by such sale and investment:

(4) Who would be the heirs at law or distributees of the infant defendant if he were dead, and whether all such persons are properly before the Court in this cause:

(5) Whether there are any liens for delinquent taxes, or otherwise, binding the said property:

(6) Whether the sale of the said real estate on the terms and conditions set out in the contract made between Richard H. Saunders, and J. O. Davidson and Peter Davidson is a good and fair sale for the said property.

(7) Any other matter deemed pertinent by the Commissioner, or required to be stated by any party in interest."

Given under my hand as Commissioner in Chancery of said Court this 12th day of February, 1921.

M. Anderson Masey
Commissioner in Chancery.

Original

Executed on the 18 day of
Feb. 1921 within the county of
Nansemond, by delivering a
true copy of the within process,
in writing, to *Gabe Howell*

in person
E B Rawles
Sheriff of Nansemond County.

Executed on the 18 day of
Feb. 1921 within the county of
Nansemond, by delivering a
true copy of the within process,
in writing, to *S E Saunders*

in person
E B Rawles
Sheriff of Nansemond County.

Executed on the 18 day of
Feb. 1921 within the county of
Nansemond, by delivering a
true copy of the within process,
in writing, to *H P Saunders*

in person
E B Rawles
Sheriff of Nansemond County.

J P Saunders
could not be found at
usual place of abode on
18 day of Feb.
1921, so the within process
was executed on the said
18 day of Feb. 1921
within the county of Nanse-
mond by delivering a true copy
of the same, in writing, and
giving information of its pur-
port to

B F Davidson

who was found at

J P Saunders
usual place of abode, and who
is a member of

his
family, and above the age of
sixteen years.

E B Rawles
Sheriff of Nansemond County.

Lucy Cross
could not be found at
usual place of abode on
18 day of Feb.
1921, so the within process
was executed on the said
18 day of Feb. 1921
within the county of Nanse-
mond by delivering a true copy
of the same, in writing, and
giving information of its pur-
port to

H P Saunders

who was found at

Lucy Cross
usual place of abode, and who
is a member of

her
family, and above the age of
sixteen years.

E B Rawles
Sheriff of Nansemond County.

6

Mr. J. W. Smith being duly sworn deposeth as follows:

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

A. J. W. Smith, 50, Holland, Virginia, farming.

Q. Please state if you are familiar with what is known as the Jackson Pele place, belonging to the estate of Richard H. Saunders, deceased?

A. Yes, I am familiar with it.

Q. Have you recently been on it?

A. Yes, sir, I have recently been on it for the purpose of making an estimate.

Q. What, in your judgment, is a fair fee-simple value for this farm?

A. About \$5,500.00, the contract price.

Q. What do you think it would rent for?

A. About \$200.

Q. Mr. Saunders during his life time entered into a contract with J. O. and Peter Davidson, for the sale of this farm for the sum of \$5,500, and while the terms were not stated in the contract, it was understood that they should be liberal. Please state whether or not you think it would be to the interest of Mrs. Saunders and her son, the infant defendant, Richard Henry Saunders, Jr., to sell this property at the price named or not?

A. Yes, sir.

Q. Do you think the interest of any party would be injured by making this sale?

A. No, sir.

And further this deponent saith not.

J. W. Smith

Mr. H. T. Jones being duly sworn deposeth as follows:

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

A. H. T. Jones, 37, Holland, Virginia, farming.

Q. Please state if you are familiar with what is known as the Jackson Peele place, belonging to the estate of Richard H. Saunders, deceased?

A. Yes, I am familiar with it.

Q. Have you recently been on it?

A. Yes, sir, I have recently been on it for the purpose of making an estimate.

Q. What, in your judgment, is a fair fee-simple value for this farm?

A. About \$5,500, the contract price.

Q. What do you think it would rent for?

A. About \$200.

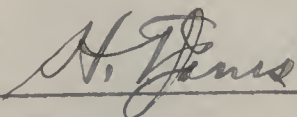
Q. Mr. Saunders, during his life time, entered into a contract with J. O. and Peter Davidson, for the sale of this farm for the sum of \$5,500, and while the terms were not stated in the contract, it was understood that they should be liberal. Please state whether or not you think it would be to the interest of Mrs. Saunders and her son, the infant defendant, Richard Henry Saunders, Jr., to sell this property at the price named or not?

A. Yes.

Q. Do you think the interest of any party would be injured by making this sale?

A. No, sir, I do not.

And further this deponent saith not.



Mr. Joe E. Holland being duly sworn deposeth as follows:

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

A. Joe E. Holland, 38, Holland, Virginia, farming.

Q. Please state if you are familiar with what is known as the Jackson Peele place, belonging to the estate of Richard H. Saunders, deceased?

A. Yes, I am familiar with it.

Q. Have you recently been on it?

A. Yes, I have recently been on it for the purpose of making an estimate.

Q. What, in your judgment, is a fair fee-simple value for this farm?

A. About \$5,500, the contract price.

Q. What do you think it would rent for?

A. About \$200.

Q. Mr. Saunders, during his life time, entered into a contract with J. O. and Peter Davidson, for the sale of this farm for the sum of \$5,500, and while the terms were not stated in the contract, it was understood that they should be liberal. Please state whether or not you think it would be to the interest of Mrs. Saunders and her son, the infant defendant, Richard Henry Saunders, Jr., to sell this property at the price named or not?

A. Yes.

Q. Do you think the interest of any party would be injured by making this sale?

A. No, I do not.

And further this deponent saith not.

Joe E. Holland

Sanders, Guardian

v.

Sanders, et al, and

Day Dixon.

DOUGLAS HOPKIN'S REPORT.

March 10. 1921. filed
JLM

H. Anderson "Laney",

Law Offices of

JAMES H. CORBITT
SUFFOLK, VIRGINIA

THE LINDEN PRINTING COMPANY, HARTFORD, CONN

VIRGINIA: IN THE CIRCUIT COURT OF NANSEMOND COUNTY:

 * Saunders, Gdn. *
 * *
 * vs. *
 * *
 * Saunders et als. *
 * and Davidson *
 * *

This day this cause came on to be further heard on the papers formerly read, and upon the report of E. Frank Story, Special Commissioner appointed by a decree entered in this cause on the 27th day of June, 1921, which said report is in part as follows:

"That in obedience to the directions contained in the said decree he, your said Special Commissioner, caused to be executed by the purchasers of the property in this cause mentioned and described, a certain deed of trust on the said property, securing the sum of \$3378.06, the amount due for the purchase price of the said real estate, evidenced by two certain bonds, one for the principal sum of \$1126.02, representing one-third of the purchase price, made payable to Mrs. Floy S. Saunders, (widow of Richard H. Saunders, deceased, representing her one-third dower interest in the said funds) the other bond for the principal sum of \$2252.04, representing the remaining two-thirds of the purchase price of the said property, made payable to Floy S. Saunders, Guardian for Richard H. Saunders, Jr., both of said bonds bearing legal interest from the 1st day of January, 1921, payable on demand, which said two bonds were delivered to the said Floy S. Saunders in her personal right and as Guardian of Richard H. Saunders, Jr. aforesaid, respectively, receipts therefor having been taken and same being herewith filed as a part of this report.

That upon the execution of the aforesaid trust deed and two bonds by the purchasers, J. O. Davidson and Peter Davidson, the Special Commissioner executed to them a deed for the said property, with special warranty of title, which said deed and trust deed have been duly recorded in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, as evidenced by receipts of G. E. Bunting, Clerk, also herewith filed as a part of this report.

Your Commissioner further reports that the said Floy S. Saunders, in her individual right and as Guardian aforesaid, has paid to him the sum of \$182.50, representing the fee allowed him by the Court and the costs of this suit, all of which has been distributed as follows:

To G. E. Bunting, Clerk, his costs,	\$10.00
" Sheriff costs for serving summons,	9.00
" M. Anderson Maxey, Comr. in Chancery,	10.00
" Internal revenue on deed,	3.50
" E. Frank Story, Atty. fee allowed by the Court,	150.00
Making a total of,....	\$182.50

All of which said doings and transaction were had and done in accordance with the specific directions contained in the aforesaid decree of June 27th, 1921.

Respectfully submitted this 30th day of September, 1921.

(Signed) E. Frank Story
Special Commissioner."

This day filed by leave of Court, to which report there is no exception, and was argued by counsel:

On consideration whereof, the Court doth approve and confirm the said report, and it appearing that nothing further remains to be done in this cause, it is ordered that same be removed from the docket.

Saunders, Geo.

7 Decr

Saunders et al. and
Dorison

Enter Jan. 14. 1925

Jas. M. Moore

5-77 574

Exam.

E. FRANK STORY
ATTORNEY AT LAW
OFFICES
COURTLAND AND FRANKLIN
VIRGINIA

 * Saunders, Guardian *
 *
 * vs. *
 *
 * Saunders et als. and *
 * Davidson. *

The answer of Richard Henry Saunders, Jr., an infant under the age of twenty-one years, by John C. Parker, Jr., his guardian ad litem assigned to defend him in this suit, and the answer of the said John C. Parker, Jr., Guardian ad Litem to the said infant defendant, to a bill of complaint exhibited against the said infant and others by Floy S. Saunders, Guardian for Richard Henry Saunders, Jr., in the Circuit Court of Nansemond County, Virginia:

For answer to the said bill the said infant defendant by his said guardian ad litem, answers and says that being of tender years he does not know what his true interest is in relation to the subject-matter of the said bill, nor does he know whether the statements therein contained are true or not. He confides the protection of his interest therein to the care of the Court. And the said Guardian ad Litem of the said infant defendant for answer to the said bill answers and says that he knows nothing of the truth or falsity of the statements in the said bill contained. He prays full protection for the infant defendant.

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

RICHARD HENRY SAUNDERS, Jr.,

By John C. Parker, Jr.
 GUARDIAN AD LITEM

John C. Parker, Jr.
 GUARDIAN AD LITEM OF THE SAID INFANT

State of Virginia,
 Southampton County, to-wit:

Sworn to before me in my county aforesaid, by John C. Parker, Jr. Guardian ad Litem, as aforesaid, this 13 day of Jan. 1921

Rich M. Owens

NOTARY PUBLIC

Saunders, Guardian

N. J. Ann. of Edu. and
Literature

Saunders et al. and
Davidson.

1921. Jan. filed Jm

E. FRANK STORY
ATTORNEY AT LAW
OFFICES
COURTLAND AND FRANKLIN
VIRGINIA

TO THE HONORABLE JAMES L. McLEMORE, JUDGE OF THE CIRCUIT
COURT OF NANSEMOND COUNTY, VIRGINIA:

=====

Humbly complaining, your complainant, Floy S. Saunders, Guardian for Richard Henry Saunders, Jr., an infant, who qualified as such Guardian in your Honor's Court on the 30th day of October, 1920, as will more fully appear from a certificate of the Clerk of the Court, showing the same, herewith filed, marked "Exhibit A", and prayed to be taken and read as a part of this bill,- sheweth unto the Court the following cause of complaint:

That the late R. H. Saunders, who departed this life intestate on the 24 day of October, 1920, leaving as his sole heir at law, a widow and the aforesaid infant child, Richard Henry Saunders, Jr., of the age of twenty-two months, was, during his life-time and at the time of his death, seised and possessed of certain tracts or parcels of land generally described as follows:

First: "All that certain tract of land situated in Holy Neck Magisterial District, in the county of Nansemond and State of Virginia, containing about one hundred and twenty-five ^{acres}, more or less and bounded as follows: On the north by the land of J. E. Vincent, on the east by the land of Henry Everett, on the south by the lands of Alfred and Henry Howell, and on the west by the lands of Jack and Arch Copeland and David Milteer."

It being the same tract or parcel of land conveyed to the said Richard H. Saunders, by John Bradshaw and wife, by their deed bearing date the 23rd day of November, 1914, and of record in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, in Deed Book No. 80, at page 359.

Second: "All that certain tract of land, situated in Holy Neck Magisterial District, Nansemond County, Virginia, containing eleven acres, more or less, bounded by the Everett Holland tract of land and the Jackson Peele tract of land, now owned by R. H. Saunders, and the David Milteer tract."

It being the same tract or parcel of land conveyed to the said R. H. Saunders by S. E. Everett and wife, by their deed bearing date the 21st day of November, 1916, and of record in the

aforesaid Clerk's Office in Deed Book No. 84, at page 553.

V That in addition to his interest in the foregoing real estate, the said infant is seised and possessed in fee-simple, subject to the dower interest of his mother, of certain real estate lying situate and being in Nansemond County, Virginia, the estimated value of which, as a whole, that is, including the dower interest of his mother, Floy S. Saunders, is about \$40,000.00 and consists:

First: Of those three certain lots, tracts or parcels of land fully set forth and described in a certain bill in Chancery filed in a certain suit now pending in your Honor's Court, generally styled, Saunders, Guardian vs. Saunders et als., reference to which is hereby generally and specially made for a full and accurate description of the said real estate:

Second: That certain other tract or parcel of land fully set forth and described in the bill of complaint filed in another certain suit in equity, now pending in your Honor's Court, generally styled, Saunders, Guardian vs. Saunders et als. and Bynum, reference to which said bill of complaint is hereby generally and specially made for a full and accurate description of the said property:

Third: An undivided one-third interest, subject to the lien of a certain trust deed, in a certain tract or parcel of land fully set forth and described in the bill of complaint filed in another certain suit in equity now pending in your Honor's Court, generally styled, Saunders, Guardian et als. vs. Saunders et als., reference to which is hereby generally and specially made for a full and accurate description of the said property.

That the said infant has personal property of the approximate value of \$5000.00, and that he has no other property.

* Your complainant further sheweth unto the Court that prior to the death of R. H. Saunders he, together with his wife, Floy S. Saunders, entered into an agreement with J. O. Davidson and Peter Davidson for the sale of the aforesaid tracts or parcels of land, a copy of which contract, together with the receipts evidencing certain payments made thereon, is herewith filed, marked "Exhibit B", and prayed to be taken and read as a part of this bill; that from said agreement it will be seen that the original pur-

chase price of the said property was Fifty-Five Hundred (\$5500.00) Dollars; that payments have been made thereon reducing the said amount to Thirty-Three Hundred Sixty-One & 25/100 (\$3361.25) Dollars, as of December 1st, 1919; that it was mutually understood and agreed by and between the parties that liberal terms should be extended the said purchasers for the remainder due on the said contract.

Your complainant, as Guardian of the said infant child, believes and alleges that it will be to the interest of her said ward to sell the said tract or parcels of land for the price in the said contract stated: that the interest on the said purchase price will yield a greater revenue than the rental of the said property.

Your complainant further sheweth unto the Court that if the said infant were dead, the following persons would be his heirs or distributees, namely, Floy S. Saunders, his mother, and his uncles, A. H. Saunders, S. E. Saunders, H. P. Saunders and J. P. Saunders, and his aunts, Josie Holland, Stella Beale, Lucy S. Cross, Minnie Cutchin and Gabie Howell.

In tender consideration of the premises, and forasmuch as your complainant is remediless therein, save in a court of equity where such matters are alone and properly cognizable, your complainant prays that the said Richard Henry Saunders, Jr., an infant under the age of twenty-one years, Floy S. Saunders, A. H. Saunders, S. E. Saunders, H. P. Saunders, J. P. Saunders, Josie Holland, Stella Beale, Lucy S. Cross, Minnie Cutchin, Gabie Howell, J. O. Davidson and Peter Davidson, may be made parties defendant to this bill and required to answer the same, the infant by his guardian ad litem and the adults in proper person, though not under oath, which is hereby waived; that a guardian ad litem may be assigned the said infant to defend his interest in this suit; that the said land may

be decreed to be sold, and the proceeds invested as the Court shall direct; that all proper allowances and counsel's fees may be made in this suit; that all proper accounts may be taken, inquiries directed, and such other and further and general relief may be granted as to equity shall seem meet.

And your complainant will ever pray, etc.

Floy S. Saunders
Guardian of Richard Henry Saunders Jr.

~~W. L. Lester~~, p. q.

STATE OF VIRGINIA, (
(to-wit:
Nansemond County, (

I, W. L. Lester a notary public in and for the county aforesaid, in the State of Virginia, do hereby certify that Floy S. Saunders, the complainant in the above suit, this day personally appeared before me in my County aforesaid, and made oath that she believes the several statements made in the foregoing bill to be true.

Given under my hand this 22nd day of December, 1920.

W. L. Lester

NOTARY PUBLIC

Sanders, Guardian

re Bill in Chancery

Sanders et al. vs

Davidson.

Filed Dec. 20, 1920

H. E. Smith
Clerk

E. FRANK STORY
ATTORNEY AT LAW
OFFICES
COURTLAND AND FRANKLIN
VIRGINIA

Mortgage trust deed	5.00
Recording deed	15.50
" Trust deed	14.75

Interest accrued on bonds	6.55
------------------------------	------

Notary's fee

41.80
.50
<u>\$42.30</u>

B. J. Brown

$$\begin{array}{r}
 87 \\
 \underline{5} \\
 4.35 \\
 2.20 \\
 \underline{6} \quad 55
 \end{array}$$

$$\begin{array}{r}
 43 \\
 \underline{44} \\
 220
 \end{array}$$

$$\begin{array}{r}
 90 \\
 85 \\
 \underline{19} \quad 5
 \end{array}$$

Nov. 8. 1924.

All deeds in connection with R. H. Saunders
estate this day mailed to Mrs. Floy S.
Saunders. See letter filed in suit of
Saunders' Gdn. vs. Saunders' Infant et als.

 * Saunders, Gdn. *
 * * * * *
 * vs. *
 * * * * *
 * Saunders et als. *
 * and Bynum *
 * *****

STATEMENT OF COSTS:

Amount Paid Clerk,	\$10.00
Paid Sheriff for serving summons,	9.00
Fee of Commissioner in Chancery,	20.00
Internal revenue on deed,	13.00
Fee allowed E. Frank Story, Atty., by the Court,	<u>300.00</u>
	\$352.00

to - - Bynum -

Ord. Clerk -	10.00
Ord. Sheriff -	9.00
5 - Ch	20.00
Provision on deed	13.00
Fee allowed E. F. B -	
Y & ,	300.00
	352.00

Donaldson

Clerk	10.00
Sheriff	9.00
5 - Ch	10.00
Provision on deed	3.50
Fee allowed E. F. B	150.00
	182.50

Courtland, Va., July 7, 1921.

IN RE: SAUNDERS, GDN. VS. SAUNDERS ET ALS. & DAVIDSON
SAUNDERS? GDN. VS. SAUNDERS ET ALS. & BYNUM:

Mr. G. E. Bunting, Clerk,
Suffolk, Va.

Dear Mr. Bunting:

I am enclosing herewith two decrees, one in each of the above styled suits, entered by the Judge on the 27th day of June, 1921. I have not sent them to you for recordation before because I have just completed settlement with the parties.

If you have entered any other decrees of a later date, please be sure not to change the date of these decrees from June 27th, but enter them as of that date. I make this request because I have executed deeds under these two decrees.

Very truly yours,

Encs.

Dic. EES/RMO:

Franklin, Va., June 27, 1921.

Mrs. Floy S. Saunders

Holland, Va.

Dear Mrs. Saunders:

Neither Bynum or Mr. Davidson came here Saturday to execute their papers, as I had expected them, and I am going to their homes to-morrow morning to get these matters closed up. I have the Carr bond and will get that to you with the other papers.

Very truly yours,

Dic. EFS/RMO:

Franklin, Va., June 10, 1921.

Tom Bynum.

Franklin, Va.

Dear Sir: .

Since writing you on yesterday to come here to-morrow, Mr. Story has received a message calling him to Goldsboro, N. C., and he is leaving here this afternoon. Therefore, I write to say that it will not be necessary for you to come to his office to-morrow as requested in his letter, and he will let you hear from him again in a few days.

Respectfully,

Stenographer

Franklin, Va., June 9, 1921.

Tom Bynum,

Franklin, Va.

Dear Sir:

I write to ask that you please meet me at my office in Franklin on next Saturday, June 11th, at about 2 o'clock p. m. I desire to see you about the Saunders matters.

Very truly yours,

Dis. EFS/RMO:

R. 2 Box 8
Franklin
Feb 24-21

Mr Story,

Dear Sir I saw
Mrs Saunders. She
said you would be
ready in a few
days. Now I want to
know what day will
you be ready to
meet me in Franklin
To fit this business
I'll come any day.
I least let me know.
Yours Truly. Tom Brown

Franklin, Va., Dec. 8, 1920.

Tom Bynum,

Franklin, Va.

Dear Sir:

I am writing to request you to please meet me at my office in Franklin on next Wednesday, Dec. 8th, at about 10 o'clock a. m., and be sure to bring with you your contrance made with R. H. Saunders for the sale of land prior to his death.

I am making this request in order that I may get a copy of the contract for the purpose of getting your deed. This is very important, please for not fail to come and bring the contract.

Very truly yours,

Dec. EFSRMO

Joel Austin Farm

Sold under Contract to Tom Byrum

R. F. D. # 3.

13,000.00

Franklin, Va

Floy S. Saunders, Guardian for
Richard Henry Saunders, Jr., an
infant under the age of twenty-
one years,

vs.

Richard Henry Saunders, Jr., an in-
fant under the age of twenty-one years,
Tom Bynum, Floy S. Saunders, Josie Hol-
land, Stella Beale, Lucy C. Cross, A. H.
Saunders, Minnie Cutchin, Cable Howell, S. E. Saunders,
H. P. Saunders and J. P. Saunders.

Spa. in Chancery to Second December Rules,
1920.

Please appoint John C. Parker, Jr., Guardian
ad Litem to the infant defendant.

Direct summons for Josie Holland and Stella
Beale to the Sheriff of Southampton County,

Recd summons for Tom Bynum to E. Frank Story,
Franklin, Va.

These four deeds compose the
Austin Farm

E. FRANK STORY
ATTORNEY AT LAW
COURTLAND, VIRGINIA
BRANCH OFFICE AT FRANKLIN, VIRGINIA

CHANCERY SUMMONS

The Commonwealth of Virginia.

Ork of Night
TO THE SHERIFF OF NANSEMOND COUNTY---GREETING:

You are Hereby Commanded to Summon.. Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years, Tom Bynum, Floy S. Saunders,
Josie Holland, Stella Beale, Lucy S. Cross, A. H. Saunders, Minnie Cutchins,
Gable Howell, S. B. Saunders, H. P. Saunders and J. P. Saunders.

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 December 1920, to answer a

Bill in Chancery, exhibited against them

in the said Court by Floy S. Saunders, Guardian for Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this 16th day of
December, 1920, in the 135th year of the Commonwealth.

A Copy---Teste:

Clerk

Teste:

Clerk

Executed this 16 day of Dec., 1920 by delivering a true copy of the with-

in process to Algrie H. Saunders and
Minnie Cutchin

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

J. L. Harcum Sheriff

ORIGINAL

E. Frank Story ----- P. q.

Floy S. Saunders, Guardian

vs. } In Chancery

Richard Henry Saunders, Jr.,
an infant, et als

1920

December Rules

Third Monday.

NANSEMOND COUNTY COURT.

Process Book, No. -----

Page -----

I hereby acknowledge due and legal service of the within summons.

A. H. Saunders

CHANCERY SUMMONS

The Commonwealth of Virginia.

Southampton
TO THE SHERIFF OF NANSEMOND COUNTY---GREETING:

You are Hereby Commanded to Summon Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years, Tom Bynum, Floy S. Saunders,
Josie Holland, Stella Beale, Lucy S. Cross, A. H. Saunders, Minnie Cutchins,
Gabie Howell, S. E. Saunders, H. P. Saunders and J. P. Saunders

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 December, ¹⁹²⁰, to answer a
Bill in Chancery, exhibited against them
in the said Court by Floy S. Saunders, Guardian for Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this 16th day of
December, 1920, in the 125th year of the Commonwealth

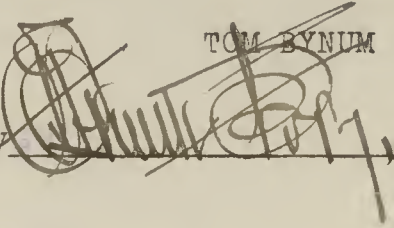
A Copy Teste:

Clerk

Teste:

Clerk

Due and legal service of the within summons is hereby acknowledged

By  His Attorney
TOM BYNUM

Executed in Southampton County Virginia, this 18th, day of December, 1920, by delivering a true copy hereof, to Stella Beale, in person.

As to Josie Holland, not finding her, nor any member of her family on whom same could be served at her usual place of abode in Southampton County Virginia, I executed in Southampton County Virginia, this the above named date, by posting a true copy hereof, for Josie Holland, on the front door of her usual place of abode in Southampton County Virginia.

C. L. Grizzard Sheriff.

Original

F. Frank Story, p. q.

Floy S. Saunders, Guardian,

vs. } In Chancery

Richard Henry Saunders, et al

et als

19 20

December Rules

Third Monday.

NANSEMOND COUNTY COURT,

Process Book, No.

Page

Sheriff

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

in process to

Executed this day of , 191 , by delivering a true copy of the with-

CHANCERY SUMMONS

The Commonwealth of Virginia.

TO THE SHERIFF OF NANSEMOND COUNTY---GREETING:

You are Hereby Commanded to Summon Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years, Tom Bynum, Floy S. Saunders,
Josie Holland, Stella Beale, Lucy S. Cross, A. H. Saunders, Minnie Cutchins,
Gabe Howell, S. E. Saunders, H. P. Saunders and J. P. Saunders.

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 December 1920, to answer a

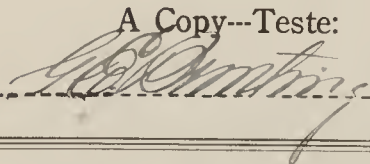
Bill in Chancery, exhibited against them

in the said Court by Floy S. Saunders, Guardian for Richard Henry Saunders,
Jr., an infant under the age of twenty-one years

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this 16th day of
December, 1920, in the 125th year of the Commonwealth.

A Copy---Teste:



Clerk

Teste:



Clerk

Executed this _____ day of _____, 191____ by delivering a true copy of the with-

in process to _____

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

Sheriff

51
A copy for
Richard Henry Saunders, Jr.
an infant.

p. q.

vs. } In Chancery

19

Rules

Monday.

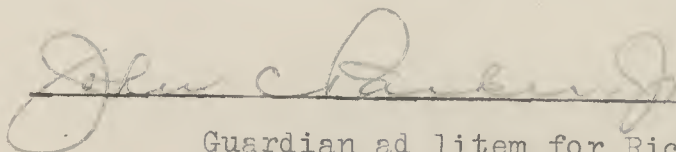
NANSEMOND COUNTY COURT,

Process Book, No. _____

Page _____

December 17, 1920

I hereby acknowledge due and legal service of the
within summons.



Guardian ad litem for Richard
Henry Saunders, Jr., Infant.

CHANCERY SUMMONS

The Commonwealth of Virginia.

TO THE SHERIFF OF NANSEMOND COUNTY--GREETING:

You are Hereby Commanded to Summon Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years, Tom Bynum, Floy S. Saunders,
Josie Holland, Stella Beale, Lucy S. Cross, A. H. Saunders, Minnie Cutchins,
Gabie Howell, S. E. Saunders, H. P. Saunders and J. P. Saunders.

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 December, ¹⁹²⁰, to answer

Bill in Chancery, exhibited against them

in the said Court by Floy S. Saunders, Guardian for Richard Henry Saunders, Jr.,
an infant under the age of twenty-one years

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this 16th day of
December, 1920, in the 135th year of the Commonwealth.

~~A Copy--Teste:~~

Clerk

Teste:

Clerk

Executed this _____ day of _____, 191____ by delivering a true copy of the with-

in process to _____

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

Sheriff

Original

E. Frank Story, -p. q.

Wloy S. Saunders, Guardian

vs. { In Chancery

Richard Henry Saunders, Jr.,
an infant et als.

19-20

December Rules

Third Monday.

NANSEMOND COUNTY COURT.

Process Book, No. 3

Page

Executed on the 17 day of
Dec 1920 within the county of
Nansemond, by delivering a
true copy of the within process,
in writing, to *Wm S. Saunders*

E B Rawler

Executed on the 17 day of
Dec 1920 within the county of
Nansemond, by delivering a
true copy of the within process,
in writing, to *Lucy S*

Cross
E B Rawler

Executed on the 17 day of
Dec 1920 within the county of
Nansemond, by delivering a
true copy of the within process,
in writing, to *Gohie*

Howell
E B Rawler

Executed on the 17 day of
Dec 1920 within the county of
Nansemond, by delivering a
true copy of the within process,
in writing, to

S E Saunders
E B Rawler
Sheriff of Nansemond County.

Executed on the 17 day of
Dec 1920 within the county of
Nansemond, by delivering a
true copy of the within process,

in writing, to *HP J. P.*
Saunders
E B Rawler
Sheriff of Nansemond County.

VIRGINIA: IN THE CIRCUIT COURT OF HANSMOND COUNTY:

* Saunders, Gdn. *
*
** vs. *
*
* Saunders et als. *
* and Bynum *
*

REPORT OF SPECIAL COMMISSIONER:

TO THE HONORABLE JAMES L. McLEMORE, JUDGE OF THE SAID COURT

The undersigned, Special Commissioner appointed by a decree entered in this cause on the 27th day of June, 1921, for the specific purposes set out in the said decree, begs leave to report:

That in obedience to the directions contained in the said decree he, your said Special Commissioner, caused to be executed by the purchaser, Tom Bynum, of the property in this cause mentioned and described, a certain deed of trust on the said property, securing the sum of \$12,956.40, the amount due for the purchase price of the said real estate, evidenced by two certain bonds, one for the principal sum of \$4,312.80, representing one-third of the purchase price of the said real estate, made payable to Mrs. Floy S. Saunders, (widow of Richard H. Saunders, deceased, representing hereone-third dower interest in the said funds), the other bond for the principal sum of \$8,637.60, representing the remaining two-thirds of the purchase price, made payable to Floy S. Saunders, Guardian for Richard H. Saunders, Jr., both of said bonds bearing legal interest from the 1st day of January, 1921, payable on demand, which said two bonds were delivered to the said Floy S. Saunders in her personal right and as Guardian of Richard H. Saunders, Jr. aforesaid, respectively, receipts therefor having been taken and same are herewith filed as a part of this report.

That upon the execution of the aforesaid trust deed and bonds by the purchaser, Tom Bynum, the Special Commissioner executed to him a deed for the said property, with special warranty of title,

which said deed and trust deed have been duly recorded in the Clerk's Office of the Circuit Court of Hansemond County, Virginia, as evidenced by receipts of G. E. Bunting, Clerk, also herewith filed as a part of this report.

Your Commissioner further reports that the said Floy S. Saunders, in her individual right and as Guardian aforesaid, has paid to him the sum of \$352.00, representing the fee allowed him by the Court and the costs of this suit, all of which has been distributed as follows:

To-G. E. Bunting, Clerk, his costs,	\$10.00
" Sheriff for serving summons,	9.00
" M. Anderson Maxey, Comr. in Chancery,	20.00
" Internal revenue on deed,	13.00
" H. Frank Story, Atty. fee allowed by the Court,	300.00
Making a total of,.....	\$352.00

All of which said doings and transactions were had and done in accordance with the specific directions contained in the aforesaid decree of June 27th, 1921.

Respectfully submitted this 30th day of September, 1921.

SPECIAL COMMISSIONER

VIRGINIA: IN THE CIRCUIT COURT OF NANSEMOND COUNTY:

* Saunders, Gdn. *
* *
** vs. *
* *
* Saunders et als. *
* and Bynum *
* *

REPORT OF SPECIAL COMMISSIONER:

TO THE HONORABLE JAMES L. McLEMORE, JUDGE OF THE SAID COURT

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That in obedience to the directions contained in the said decree he, your said Special Commissioner, caused to be executed by the purchaser, Tom Bynum, of the property in this cause mentioned and described, a certain deed of trust on the said property, securing the sum of \$12,956.40, the amount due for the purchase price of the said real estate, evidenced by two certain bonds, one for the principal sum of \$4,318.80, representing one-third of the purchase price of the said real estate, made payable to Mrs. Floy S. Saunders, (widow of Richard H. Saunders, deceased, representing her one-third dower interest in the said funds), the other bond for the principal sum of \$8,637.60, representing the remaining two-thirds of the purchase price, made payable to Floy S. Saunders, Guardian for Richard H. Saunders, Jr., both of said bonds bearing legal interest from the 1st day of January, 1921, payable on demand, which said two bonds were delivered to the said Floy S. Saunders in her personal right and as Guardian of Richard H. Saunders, Jr. aforesaid, respectively, receipts therefor having been taken and same are herewith filed as a part of this report.

That upon the execution of the aforesaid trust deed and bonds by the purchaser, Tom Bynum, the Special Commissioner executed to him a deed for the said property, with special warranty of title,

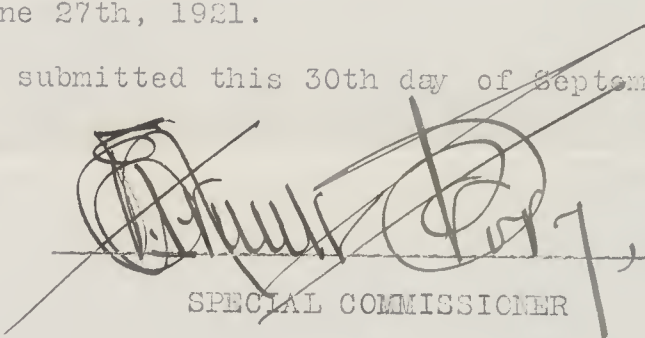
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To-G. E. Bunting, Clerk, his costs,	\$10.00
" Sheriff for serving summons,	9.00
" M. Anderson Maxey, Comr. in Chancery,	20.00
" Internal revenue on deed,	13.00
" E. Frank Story, Atty. fee allowed by the Court,	300.00
Making a total of,.....	\$352.00

All of which said doings and transactions were had and done in accordance with the specific directions contained in the aforesaid decree of June 27th, 1921.

Respectfully submitted this 30th day of September, 1921.


SPECIAL COMMISSIONER

 * Saunders, Gdn. *
 *
 * vs. *
 *
 * Saunders et als. *
 * and Bynum *
 *

Received of E. Frank Story, Special Commissioner in the above styled suit, one certain bond for the sum of \$4,318.30, signed by Tom Bynum, payable on demand with legal interest from the 1st day of January, 1921, to the undersigned. Which said bond said Special Commissioner has delivered to me in accordance with the directions contained in a decree entered in the above styled cause on the 27th day of June, 1921.

Sept. 1-1921

Mrs. Floy S. Saunders.

 * Saunders, Gdn. *
 *
 * Vs. *
 *
 * Saunders et als. *
 * and Bynum *
 *

Received of E. Frank Story, Special Commissioner in the above styled suit, one certain bond for the sum of \$8,637.60, signed by Tom Bynum, payable on demand, with legal interest from the 1st day of January, 1921, to me as Guardian for Richard H. Saunders, Jr. Which said bond said Special Commissioner has delivered to me in accordance with the directions contained in the above styled cause on the 27th day of June, 1921.

Sept. 1-1921

Mrs. Floy S. Saunders.

Guardian for Richard H. Saunders, Jr.

MR *E. Bank Stray, Coll*
TO G. E. BUNTING, CLERK CIRCUIT COURT
OF NANSEMOND COUNTY
SUFFOLK, VA..

1921-5-2

TAX, \$ *1300* TRANSFER, \$ *100* FEE, \$ *125*

RECORDING

DEED FORM

At V.S.
Stray, Sec. Com. TO *Tom Rynum*

Mar tax \$1300
E. Bank

28 75

Paid

Sept 6th

1921

Ruby V. Bunting Clerk

MR *E. Bank Story, City*
TO G. E. BUNTING, CLERK CIRCUIT COURT
OF NANSEMOND COUNTY
SUFFOLK. VA..

1921-8-2

TAX, \$ *1300* TRANSFER, \$ *X* FEE, \$ *500*

1500

RECORDING *W. J. T.* DEED FORM *Tom*
Dynum TO *E. Bank Story, Trusts*

Paid *Sept 6th*

1921 *Rehugh L. Bunting* Clerk

Saunders, G. W.

- r. } Report of Spec.
Comv.

Saunders et al. and
Bynum.

1925: Jan. 14. Filed
{L.M.

E. FRANK STORY
ATTORNEY AT LAW
OFFICES
COURTLAND AND FRANKLIN
VIRGINIA

C O P Y:

* Saunders, Guardian *
* *
* vs. *
* *
* Saunders, et als. and *
* Bynum *
* *

This day this cause came on to be further heard on the papers formerly read, and upon the report of Commissioner in Chancery, M. Anderson Maxey, filed on the _____ day of _____ 1921, reporting that it will be to the interest of the heirs of Richard H. Saunders, deceased, that the real estate in the bill and proceedings in this cause mentioned and described, should be sold to Tom Bynum, in accordance with the contract made and entered into by the said decedent, Richard H. Saunders, with the said purchaser prior to his death, to which report there is no exception and was argued by counsel:

On consideration whereof, the Court doth approve and confirm the said report, and doth adjudge, order and decree that E. Frank Story be, and he is hereby appointed a Special Commissioner for the purpose of receiving from the said purchaser, the balance of the purchase price of the said real estate, which is generally described as follows:

That certain tract or parcel of land, lying situate and being in Holy Neck Magisterial District, Nansemond County, Virginia, estimated to contain _____ acres, more or less, known as a part of the "Jacob Austin farm", and bounded by the lands of Ernest Cross, the Mill Pond, Delia Hayes and others.

The amount of the unpaid balance ascertained to be due by the said purchaser as of January 1st, 1921, being the sum of \$12,556.40, which said amount the said Special Commissioner is hereby authorized and directed to receive and when the same is fully paid, that he execute to the said purchaser a deed, with special warranty of title, for the said real estate.

The Court doth further adjudge, order and decree that the said Special Commissioner be, and he is hereby authorized to receive in settlement of the aforesaid sum of \$12956.40, the amount due for the purchase price of the said real estate, two bonds, to be executed by the said purchaser, one of said bonds to be for the sum of \$4,318.80, representing one-third of the aforesaid purchase price, same to be made payable to Mrs. Floy S. Saunders, (widow of Richard H. Saunders, deceased, representing her one-third dower interest in the said funds, which said funds are held by the Court to be a part of the personal property belonging to the estate of Richard H. Saunders, deceased); the other bond to be for the sum of \$8,639.60, representing the remaining two-thirds of the purchase price of the said property, made payable to Floy S. Saunders, Guardian for Richard Henry Saunders, the remaining sole distributee of the estate of Richard H. Saunders, deceased, both of said bonds to bear legal interest from the 1st day of January, 1921, to be payable on demand, containing a waiver of the Homestead Exemption, and to be secured equally by a deed of trust to be executed by the said purchaser in due form of law, on the real estate hereinbefore described, which said two bonds, the said Special Commissioner will forthwith, after the execution thereof, deliver to the obligees hereinbefore named, taking receipts therefor to be filed with the papers in this cause, and the said Special Commissioner will forthwith, after the execution of the deed of trust hereinbefore provided for, lodge both the deed and deed of trust with the Clerk of the Circuit Court of Nansemond County, Virginia, to be by him recorded as required by law.

The Court doth further adjudge, order and decree that the costs of this suit and sale, including a fee of \$_____ to be paid to E. Frank Story, Attorney, for his services in this cause, which said amount shall be in lieu of commissions of the

Special Commissioner, the taxed attorneys fee and the writing of the aforesaid deed to the purchaser, (but not the trust deed, the expense of which shall be borne by the purchaser), shall be paid as follows: One-third by Mrs. Floy S. Saunders, individually, and the remaining two-thirds by the said Mrs. Floy S. Saunders, Guardian of Richard Henry Saunders, and the said Guardian is hereby authorized to charge the amount thus paid by her in this behalf against her said ward in the regular course of her Guardianship account.

And it being evident that the said Special Commissioner will not receive any funds as Special Commissioner other than the costs of this suit, he shall not be required to execute a bond.

~~And the Commissioner will report to Court.~~

It being apparent to the Court that the aforesaid Guardian, Floy S. Saunders, has heretofore executed a bond as Guardian of Richard Henry Saunders, in an amount sufficient to amply protect the funds directed to be paid her under this decree, it will not be necessary for her to execute an additional bond.

And the Commissioner will report to Court.

 * Saunders, Guardian *
 * *
 * vs. *
 * *
 * Saunders, et als. and *
 * Bynum. *
 * *

This day this cause came on to be further heard on the papers formerly read, and upon the report of Commissioner in Chancery, M. Anderson Maxey, filed on the 10th day of March 1921, reporting that it will be to the interest of the heirs of Richard H. Saunders, deceased, that the real estate in the bill and proceedings in this cause mentioned and described, should be sold to Tom Bynum, in accordance with the contract made and entered into by the said decedent, Richard H. Saunders, with the said purchaser prior to his death, to which report there is no exception and was argued by counsel:

On consideration whereof, the Court doth approve and confirm the said report, and doth adjudge, order and decree that E. Frank Story be, and he is hereby appointed a Special Commissioner for the purpose of receiving from the said purchaser, the balance of the purchase price of the said real estate, which is generally described as follows:

That certain tract or parcel of land, lying situate and being in Holy Neck Magisterial District, Nansemond County, Virginia, estimated to contain _____ acres, more or less, known as a part of the "Jacob Austin farm", and bounded by the lands of Ernest Cross, the Mill Pond, Delia Hayes and others.

The amount of the unpaid balance ascertained to be due by the said purchaser as of January 1st, 1921, being the sum of \$12,956.40, which said amount the said Special Commissioner is hereby authorized and directed to receive ^{in pursuance of trust bonds as hereinafter provided} and when the same is fully^{ss} paid, that he execute to the said purchaser a deed, with special warranty of title, for the said real estate.

The Court doth further adjudge, order and decree that the said Special Commissioner be, and he is hereby authorized to receive in settlement of the aforesaid sum of \$12956.40, the amount due for the purchase price of the said real estate, two bonds, to be executed by the said purchaser, one of said bonds to be for the sum of \$4,318.80, representing one-third of the aforesaid purchase price, same to be made payable to Mrs. Floy S. Saunders, (widow of Richard H. Saunders, deceased, representing her one-third dower interest in the said funds, which said funds are held by the Court to be a part of the personal property belonging to the estate of Richard H. Saunders, deceased); the other bond to be for the sum of \$8,637.60, representing the remaining two-thirds of the purchase price of the said property, made payable to Floy S. Saunders, Guardian for Richard Henry Saunders, the remaining sold distributee of the estate of Richard H. Saunders, deceased, both of said bonds to bear legal interest from the 1st day of January, 1921, to be payable on demand, containing a waiver of the Homestead Exemption, and to be secured equally by a deed of trust to be executed by the said purchaser in due form of law, on the real estate hereinbefore described, which said two bonds, the said Special Commissioner will forthwith, after the execution thereof, deliver to the obligees hereinbefore named, taking receipts therefor to be filed with the papers in this cause, and the said Special Commissioner will forthwith, after the execution of the deed of trust hereinbefore provided for, lodge both the deed and deed of trust with the Clerk of the Circuit Court of Nansemond County, Virginia, to be by him recorded as required by law.

The Court doth further adjudge, order and decree that the costs of this suit and sale, including a fee of \$300- to be paid to E. Frank Story, Attorney, for his services in this cause, which said amount shall be in lieu of commissions of the

Special Commissioner, the taxed attorneys fee and the writing of the aforesaid deed to the purchaser, (but not the trust deed, the expense of which shall be borne by the purchaser), shall be paid as follows: One-third by Mrs. Floy S. Saunders, individually, and the remaining two-thirds by the said Mrs. Floy S. Saunders, Guardian of Richard Henry Saunders, and the said Guardian is hereby authorized to charge the amount thus paid by her in this behalf against her said ward in the regular course of her Guardianship account.

And it being evident that the said Special Commissioner will not receive any funds as Special Commissioner other than the costs of this suit, he shall not be required to execute a bond.

~~And the Commissioner will report to Court.~~

It being apparent to the Court that the aforesaid Guardian, Floy S. Saunders, has heretofore executed a bond as Guardian of Richard Henry Saunders, in an amount sufficient to amply protect the funds directed to be paid her under this decree, it will not be necessary for her to execute an additional bond.

And the Commissioner will report to Court.

Saunders, Edu.

R. 3 2nd Decree

Saunders, et als. ^{and}
Byrnum.

Enter June 27. 1971.

James W. Moore.

#5-79. 350

E. FRANK STORY
ATTORNEY AT LAW
OFFICES
COURTLAND AND FRANKLIN
VIRGINIA

COMMISSIONER'S REPORT.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

Floy S. Saunders, Guardian for
Richard Henry Saunders, Jr. Complainant,

v.

Richard Henry Saunders, Jr., an in-
fant under the age of twenty-one
years, ✓ Tom Bynum, ✓ Floy S. Saunders,
✓ Josie Holland, ✓ Stella Beale, ✓ Lucy
Cross, ✓ A. H. Saunders, ✓ Minnie Cutchin,
✓ Gabe Howell, ✓ S. F. Saunders, ✓ M. P.
Saunders and ✓ J. P. Saunders Defendants.

Commissioner's Office,

Suffolk, Virginia, March 4, 1921.

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

In pursuance of a decree of your Honor's court, entered in the suit of which the above is the general style, on the 22nd day of January, 1921, I gave notice to the parties that on the 23rd day of February, 1921, at 3:30 o'clock, p.m., and at the offices of James H. Corbitt, Attorney at Law, National Bank Building, in the City of Suffolk, Virginia, I should proceed to execute the said decree. The said notice, with service of same, is herewith returned.

I attended at the time and place so appointed and took the depositions of Joe M. Holland, H. T. Jones and J. W. Smith. The said depositions are returned herewith. After consideration of the same, together with the pleadings in the cause, I respectfully report:-

1. That the infant defendant, Richard Henry Saunders, Jr. is possessed or entitled, subject to the dower of his mother, Floy S. Saunders, to the following described real estate in Nansemond County, Virginia:

That certain tract or parcel of land, contracted to be sold by the said R. H. Saunders during his life-time to Tom Bynum, estimated to contain about _____ acres, known as a part of the "Jacob Austin farm", and bounded by the lands of Ernest Cross, the Mill Pond, Delia Hayes and others.

The fee simple value of the said real estate is \$13,000, and its annual value is \$1,000.

That in addition to his interest in the foregoing real estate, the said infant is seized and possessed in fee-simple, subject to the dower interest of his mother, of certain other real estate lying situate and being in Nansemond County, Virginia, the estimated value of which, as a whole, that is, including the dower interest of his mother, is about \$36,000.00, and consists:

First: Of those three certain lots, tracts or parcels of land fully set forth and described in a certain bill in Chancery filed in a certain suit now pending in your Honor's Court, generally styled, Saunders, Guardian vs. Saunders et als. reference to which is hereby generally and specially made for a full and accurate description of the said real estate:

Second: That certain other tract or parcel of land fully set forth and described in the bill of complaint filed in another certain suit in equity, now pending in your Honor's Court, generally styled, Saunders, Guardian vs. Saunders et als. and Davidson, reference to which said bill of complaint is hereby generally and specially made for a full and accurate description of the said property:

Third: An undivided one-third interest, subject to the lien of a certain trust deed, in a certain tract or parcel of land fully set forth and described in the bill of complaint filed in another certain suit in equity now pending in your Honor's Court, generally styled, Saunders, Guardian et als. vs. Saunders et als., reference to which said bill of complaint is hereby generally and specially made for a full and accurate description of the said property.

That the said infant has personal property of the approximate value of \$5000.00, and that he has no other property.

2. That the interest of the said infant defendant will be promoted by a sale of the real estate in the bill mentioned, or any part thereof, and an investment of the proceeds of sale

in other property.

3. That the rights of no person will be violated by such sale and investment.

4. That the following aunts and uncles of the said infant defendant would be the heirs at law or distributees of the infant defendant, if he were dead: Josie Holland, Stella Beale, Lucy Cross, Minnie Cutchin, Gabie Howell, A. H. Saunders, S. F. Saunders, H. P. Saunders and J. P. Saunders, and the same are properly before the Court.

5. That there are no liens for delinquent taxes, or otherwise, binding the said property.

6. That the sale of the said real estate on the terms and conditions set out in the contract made between Richard H. Saunders, and Tom Bynum is a good and fair sale for the said property.

Respectfully submitted,

Commissioner in Chancery.

Samuel

6.

Bryn

COMMISSIONER'S REPORT.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

Floy S. Saunders, Guardian for
Richard Henry Saunders, Jr. Complainant,

v.

Richard Henry Saunders, Jr., an in-
fant under the age of twenty-one
years, Tom Bynum, Floy S. Saunders,
Josie Holland, Stella Beale, Lucy
Cross, A. H. Saunders, Minnie Cutchin,
Gable Howell, S. F. Saunders, H. P.
Saunders and J. P. Saunders Defendants.

Commissioner's Office,

Suffolk, Virginia, March 4, 1921.

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

In pursuance of a decree of your Honor's court, entered in the suit of which the above is the general style, on the 22nd day of January, 1921, I gave notice to the parties that on the 23rd day of February, 1921, at 3:30 o'clock, p.m., and at the offices of James B. Corbitt, Attorney at Law, National Bank Building, in the City of Suffolk, Virginia, I should proceed to execute the said decree. The said notice, with service of same, is herewith returned.

I attended at the time and place so appointed and took the depositions of Joe E. Holland, J. T. Jones and J. W. Smith. The said depositions are returned herewith. After consideration of the same, together with the pleadings in the cause, I respectfully report:-

1. That the infant defendant, Richard Henry Saunders, Jr. is possessed or entitled, subject to the dower of his mother, Floy S. Saunders, to the following described real estate in Nansemond County, Virginia:

That certain tract or parcel of land, contracted to be sold by the said R. J. Saunders during his life-time to Tom Bynum, estimated to contain about _____ acres, known as a part of the "Jacob Austin farm", and bounded by the lands of Ernest Cross, the Mill Pond, Delia Hayes and others.

The fee simple value of the said real estate is \$13,000, and its annual value is \$1,000.

That in addition to his interest in the foregoing real estate, the said infant is seized and possessed in fee-simple, subject to the dower interest of his mother, of certain other real estate lying situate and being in Nansemond County, Virginia, the estimated value of which, as a whole, that is, including the dower interest of his mother, is about \$36,000.00, and consists:

First: Of those three certain lots, tracts or parcels of land fully set forth and described in a certain bill in Chancery filed in a certain suit now pending in your Honor's Court, generally styled, Saunders, Guardian vs. Saunders et als. reference to which is hereby generally and specially made for a full and accurate description of the said real estate:

Second: That certain other tract or parcel of land fully set forth and described in the bill of complaint filed in another certain suit in equity, now pending in your Honor's Court, generally styled, Saunders, Guardian vs. Saunders et als. and Davidson, reference to which said bill of complaint is hereby generally and specially made for a full and accurate description of the said property:

Third: An undivided one-third interest, subject to the lien of a certain trust deed, in a certain tract or parcel of land fully set forth and described in the bill of complaint filed in another certain suit in equity now pending in your Honor's Court, generally styled, Saunders, Guardian et als. vs. Saunders et als., reference to which said bill of complaint is hereby generally and specially made for a full and accurate description of the said property.

That the said infant has personal property of the approximate value of \$5000.00, and that he has no other property.

2. That the interest of the said infant defendant will be promoted by a sale of the real estate in the bill mentioned, or any part thereof, and an investment of the proceeds of sale

in other property.

3. That the rights of no person will be violated by such sale and investment.

4. That the following aunts and uncles of the said infant defendant would be the heirs at law or distributees of the infant defendant, if he were dead: Josie Holland, Stella Beale, Lucy Cross, Minnie Cutchin, Gabie Howell, A. H. Saunders, S. F. Saunders, H. P. Saunders and J. P. Saunders, and the same are properly before the Court.

5. That there are no liens for delinquent taxes, or otherwise, binding the said property.

6. That the sale of the said real estate on the terms and conditions set out in the contract made between Richard H. Saunders, and Tom Bynum is a good and fair sale for the said property.

Respectfully submitted,

Commissioner's Fee _____

M. Anderson Masey
Commissioner in Chancery.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

To

Floy S. Saunders, Guardian for
Richard Henry Saunders, Jr.....Complainant,

and

Richard Henry Saunders, Jr., an in-
fant under the age of twenty-one
years, Tom Bynum, Floy S. Saunders,
Josie Holland, Stella Beale, Lucy
Cross, A. H. Saunders, Minnie Cutchin,
Gable Howell, S. E. Saunders, H. P.
Saunders and J. P. Saunders.....Defendants.

You are hereby notified that on Wednesday, the 23rd
day of February, 1921, at the offices of James H. Corbitt,
Attorney at Law, National Bank Building, in the City of Suffolk,
Virginia, at 3:30 o'clock, P.M., (at which time and place you
are required to attend) I shall take, state and settle the fol-
lowing accounts which are to be taken, stated and settled and
reported to Court in pursuance of a decree of the Circuit Court
of Nansemond County, Virginia, rendered on the 22nd day of
January, 1921, in the suit in Chancery pending in said Court, to
which you are parties plaintiff and defendant, to-wit:

"(1) Of what estate, real and personal, the infant
defendant, Richard Henry Saunders, Jr., is possessed or entitled
and what is his respective share or interest therein, where such
estate is situated and what is its fee-simple and annual value:

(2) Whether the interest of the said infant defendant
will be promoted by a sale of the real estate in the bill mentioned,
or any part thereof, and an investment of the proceeds of sale in
other property:

(3) Whether the rights of any person will be violated
by such sale and investment:

(4) Who would be the heirs at law or distributees of the infant defendant, if he were dead, and whether all such persons are properly before the Court, in this cause:

(5) Whether there are any liens for delinquent taxes, or otherwise, binding the said property:

(6) Whether the sale of the said real estate on the terms and conditions set out in the contract made between Richard H. Saunders, and Tom Bynum is a good and fair sale for the said property.

(7) Any other matter deemed pertinent by the Commissioner, or required to be stated by any party in interest."

Given under my hand as Commissioner in Chancery of said Court this 12th day of February, 1921.

Comm. fee: \$20.00
pd. by E. Frank Story, Atty.

M. Anderson Masey

M. Anderson Masey
Commissioner in Chancery.

Executed the within notice in Southampton County, Virginia, this 18th day of February, 1921, as follows:

As to the within named Josie Holland, by delivering a true copy hereof to her in person.

As to Stella Beale, not finding her at her usual place of abode, I delivered a true copy hereof to Bernice Beale Herrin, a member of her family over the age of sixteen years, and explained to her the purport thereof.

C. L. Ginzard

Sheriff of Southampton County,
Virginia.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

To

Floy S. Saunders, Guardian for
Richard Henry Saunders, Jr.Complainant,

and.

Richard Henry Saunders, Jr., an in-
fant under the age of twenty-one
years, Tom Bynum, Floy S. Saunders,
Josie Holland, Stella Beale, Lucy
Cross, A. H. Saunders, Minnie Cutchin,
Gable Howell, S. F. Saunders, H. P.
Saunders and J. P. Saunders.....Defendants.

You are hereby notified that on Wednesday, the 23rd
day of February, 1921, at the offices of James H. Corbitt,
Attorney at Law, National Bank Building, in the City of Suffolk,
Virginia, at 3:30 o'clock, P.M., (at which time and place you
are required to attend) I shall take, state and settle the fol-
lowing accounts which are to be taken, stated and settled and
reported to Court in pursuance of a decree of the Circuit Court
of Nansemond County, Virginia, rendered on the 22nd day of
January, 1921, in the suit in Chancery pending in said Court, to
which you are parties plaintiff and defendant, to-wit:

"(1) Of what estate, real and personal, the infant
defendant, Richard Henry Saunders, Jr., is possessed or entitled
and what is his respective share or interest therein, where such
estate is situated and what is its fee-simple and annual value:

(2) Whether the interest of the said infant defendant
will be promoted by a sale of the real estate in the bill mentioned
or any part thereof, and an investment of the proceeds of sale in
other property:

(3) Whether the rights of any person will be violated
by such sale and investment:

(4) Who would be the heirs at law or distributees of the infant defendant, if he were dead, and whether all such persons are properly before the Court in this cause:

(5) Whether there are any liens for delinquent taxes, or otherwise, binding the said property:

(6) Whether the sale of the said real estate on the terms and conditions set out in the contract made between Richard H. Saunders, and Tom Bynum is a good and fair sale for the said property.

(7) Any other matter deemed pertinent by the Commissioner, or required to be stated by any party in interest."

Given under my hand as Commissioner in Chancery of said Court this 12th day of February, 1921.

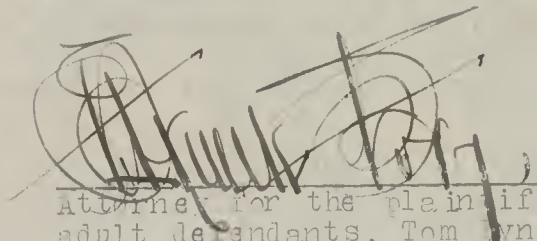
M. Anderson Maskey
Commissioner in Chancery.

Executed in the County of Isle of Wight
on this 17th day of Feb., 1921 by delivering
true copies of the within to:

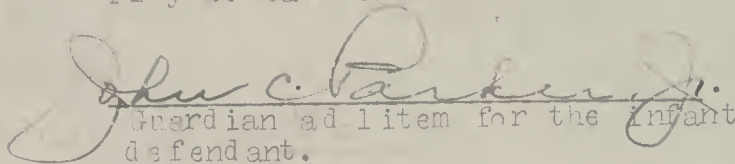
A. H. Saunders & Minnie Cutchin
in person.

W. H. Chapman Sheriff
by J. L. Harcum. D. S.

We hereby accept due and legal service of the within
notice.



Attorney for the plaintiff and
adult defendants, Tom Lynum and
Floy S. Saunders.



Guardian ad litem for the infant
defendant.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

To

Floy S. Saunders, Guardian for
Richard Henry Saunders, Jr.,.....Complainant,

and

Richard Henry Saunders, Jr., an in-
fant under the age of twenty-one
years, Tom Bynum, Floy S. Saunders,
Josie Holland, Stella Beale, Lucy
Cross, A. H. Saunders, Minnie Cutchin,
Gable Howell, S. E. Saunders, H. P.
Saunders, and J. P. SaundersDefendants.

You are hereby notified that on Wednesday, the 23rd day of February, 1921, at the offices of James H. Corbitt, Attorney at Law, National Bank Building, in the City of Suffolk, Virginia, at 3:30 o'clock, P.M., (at which time and place you are required to attend) I shall take, state and settle the following accounts which are to be taken, stated and settled and reported to Court in pursuance of a decree of the Circuit Court of Nansemond County, Virginia, rendered on the 22nd day of January, 1921, in the suit in Chancery pending in said Court, to which you are parties plaintiff and defendant, to-wit:

"(1) Of what estate, real and personal, the infant defendant, Richard Henry Saunders, Jr., is possessed or entitled and what is his respective share or interest therein, where such estate is situated and what is its fee-simple and annual value:

(2) Whether the interest of the said infant defendant will be promoted by a sale of the real estate in the bill mentioned, or any part thereof, and an investment of the proceeds of sale in other property.

(3) Whether the rights of any person will be violated by such sale and investment:

(4) Who would be the heirs at law or distributees of the infant defendant, if he were dead, and whether all such persons are properly before the Court in this cause:

(5) Whether there are any liens for delinquent taxes, or otherwise, binding the said property:

(6) Whether the sale of the said real estate on the terms and conditions set out in the contract made between Richard H. Saunders, and Tom Bynum is a good and fair sale for the said property.

(7) Any other matter deemed pertinent by the Commissioner, or required to be stated by any party in interest."

Given under my hand as Commissioner in Chancery of said Court this 12th day of February, 1921.

M. Anderson Mayes
Commissioner in Chancery.

Executed on the 18 day of
Feb. 1921 within the county of
Nansemond, by delivering a
true copy of the within process,

in writing, to *Gabe Howell*

in person
E. B. Rawls
Sheriff of Nansemond County.

Executed on the 18 day of
Feb. 1921 within the county of
Nansemond, by delivering a
true copy of the within process,

in writing, to *S. E. Saunders*

in person
E. B. Rawls
Sheriff of Nansemond County.

Executed on the 18 day of
Feb. 1921 within the county of
Nansemond, by delivering a
true copy of the within process,

in writing, to *H. P. Saunders*

in person
E. B. Rawls
Sheriff of Nansemond County.

J. P. Saunders
could not be found at his
usual place of abode on

18 day of Feb.
1921, so the within process
was executed on the said
18 day of Feb. 1921
within the county of Nanse-
mond by delivering a true copy
of the same, in writing, and
giving information of its pur-
port to

B. F. Davidson

who was found at

J. P. Saunders
usual place of abode, and who
is a member of

his
family, and above the age of
sixteen years.

E. B. Rawls
Sheriff of Nansemond County.

Lucy Cross
could not be found at his
usual place of abode on

18 day of Feb.
1921, so the within process
was executed on the said
18 day of Feb. 1921
within the county of Nanse-
mond by delivering a true copy
of the same, in writing, and
giving information of its pur-
port to

H. P. Saunders

who was found at

Lucy Cross
usual place of abode, and who
is a member of

her
family, and above the age of
sixteen years.

E. B. Rawls
Sheriff of Nansemond County.

Mr. Joe F. Holland being duly sworn deposeth as follows:

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

A. Joe F. Holland, 38, Holland, Virginia, farming.

Q. Please state if you are familiar with the tract or parcel of land in Holy Neck Magisterial District, Nansemond County, Virginia, which Richard Henry Saunders agreed to sell to Tom Bynum.

A. Yes, I am familiar with the property.

Q. Have you recently been on the premises?

A. Yes, sir.

Q. What, in your judgment, is a fair fee-simple value for this tract or parcel of land?

A. \$13,000.

Q. What will it rent for per annum?

A. About \$1,000.

Q. Mr. Saunders, prior to his death, entered into a contract with Tom Bynum to sell him this tract or parcel of land for the sum of \$13,000, \$800 of which was paid to Mr. Saunders prior to his death, and the other to be on liberal terms; I should say something like \$500 per annum and the interest on the principal. Please state if, in your judgment, you consider this a good sale.

A. Yes.

Q. I understand then, Mr. Holland, that you think the interest of the infant defendant, Richard Henry Saunders, Jr., would be promoted by this sale?

A. Yes, I think so.

Q. Do you know or think that the rights of any party in interest will be injured by this sale; the parties in interest are Mrs. Saunders, the widow, and the infant defendant above

named?

A. No, I don't think they would.

And further this deponent saith not.

J. E. Holland

Mr. J. W. Smith being duly sworn deposeth as follows:

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

A. J. W. Smith, 50, Holland, Virginia, farming.

Q. Please state if you are familiar with the tract or parcel of land in Holy Neck Magisterial District, Nansemond County, Virginia, which Richard Henry Saunders agreed to sell to Tom Bynum?

A. Yes, sir.

Q. Have you recently been on the premises?

A. Yes, sir.

Q. What, in your judgment, is a fair fee-simple value for this tract or parcel of land?

A. \$13,000.

Q. What will it rent for per annum?

A. About \$1,000.

Q. Mr. Saunders, prior to his death, entered into a contract with Tom Bynum to sell him this tract or parcel of land for the sum of \$13,000, \$800.00 of which was paid to Mr. Saunders prior to his death, and the other to be on liberal terms; I should say something like \$500 per annum and the interest on the principal. Please state if, in your judgment, you consider this a good sale.

A. Yes, sir.

Q. I understand then, Mr. Smith, that you think the interest of the infant defendant, Richard Henry Saunders, Jr. would be promoted by this sale?

A. Yes, I think so.

Q. Do you know or think that the rights of any party in interest will be injured by this sale; the parties in interest are Mrs. Saunders, the widow, and the infant defendant above named?

A. No, I don't think they would.

And further this deponent saith not.

J. W. Smith

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Mr. H. T. Jones being duly sworn deposeth as follows:

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

A. H. T. Jones, 37, Holland, Virginia, farming.

Q. Please state if you are familiar with the tract or parcel of land in Holy Neck Magisterial District, Nansemond County, Virginia, which Richard Henry Saunders agreed to sell to Tom Bynum?

A. Yes; I am familiar with it.

Q. Have you recently been on the premises?

A. Yes, sir.

Q. What, in your judgment, is a fair fee-simple value for this tract or parcel of land?

A. \$13,000.

Q. What will it rent for per annum?

A. About \$1,000.

Q. Mr. Saunders, prior to his death, entered into a contract with Tom Bynum to sell him this tract or parcel of land for the sum of \$13,000, \$800 of which was paid to Mr. Saunders prior to his death, and the other to be on liberal terms; I should say something like \$500 per annum and the interest on the principal. Please state if, in your judgment, you consider this a good sale.

A. Yes.

Q. I understand then, Mr. Jones, that you think the interest of the infant defendant, Richard Henry Saunders, Jr. would be promoted by this sale?

A. Yes, I think so.

Q. Do you know or think that the rights of any party in interest will be injured by this sale; the parties in interest are Mrs. Saunders, the widow, and the infant defendant above named?

A. No, I don't think they would.

And further this deponent saith not.

A. Jones

March 1921

Brundage, Eustace,
T.
Brundage, et al., and
Synes.

COMMISSIONER'S REPORT.

10th March 1921. filed.
J.H.M.

A. Anderson, Esq.,
Law Offices of
JAMES H. CORBITT
SUFFOLK, VIRGINIA

THE LINDEN PRINTING COMPANY, HARTFORD, CONN

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA:

 * Floy S. Saunders, Guardian *
 * for Richard Henry Saunders, *
 * Jr. *
 * *
 * vs. *
 * *
 * Richard Henry Saunders, Jr., an *
 * infant under the age of twenty-one *
 * years, J. O. Davidson, Peter David- *
 * son, Floy S. Saunders, Josie Holland, *
 * Stella Beale, Lucy S. Cross, A. H. *
 * Saunders, S. E. Saunders, Minnie *
 * Cutchin, Gabie Howell, H. P. Saunders *
 * and J. P. Saunders. *
 * *

This day this cause, which has regularly matured at rules, according to law, came on to be heard on the bill of the complainant, verified by oath thereto, and exhibits therewith filed, the answer of John C. Parker, Jr., Guardian ad Litem, a discreet and competent attorney at law, duly assigned at rules, according to law, to defend the interest of the infant defendant, Richard Henry Saunders, Jr., this day filed by leave of court, and his own answer, on oath, to the bill of complaint, to which answers the complainant replies generally; the adult defendants, J. O. Davidson, Peter Davidson, Floy S. Saunders, Josie Holland, Stella Beale, Lucy S. Cross, A. H. Saunders, Minnie Cutchin, Gabie Howell, S. E. Saunders, H. P. Saunders and J. P. Saunders, on whom process has been duly served, still failing to appear and plead, answer or demur, the said bill was taken for confessed as to them, and was argued by counsel:

On consideration whereof, the Court doth adjudge, order and decree that this cause be referred to one of the commissioners of this Court who is directed to inquire and report to the court as follows:

(1) Of what estate, real and personal, the infant defendant, Richard Henry Saunders, Jr., is possessed or entitled and

what is his respective share or interest therein, where such estate is situated and what is its fee-simple and annual value:

(2) Whether the interest of the said infant defendant will be promoted by a sale of the real estate in the bill mentioned, or any part thereof, and an investment of the proceeds of sale in other property:

(3) Whether the rights of any person will be violated by such sale and investment:

(4) Who would be the heirs at law or distributees of the infant defendant if he were dead, and whether all such persons are properly before the Court in this cause:

(5) Whether there are any liens for delinquent taxes, or otherwise, binding the said property:

(6) Whether the sale of the said real estate on the terms and conditions set out in the contract made between Richard H. Saunders, and J. O. Davidson and Peter Davidson is a good and fair sale for the said property.

(7) Any other matter deemed pertinent by the Commissioner, or required to be stated by any party in interest.

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA;

* Floy S. Saunders, Guardian for *
* Richard Henry Saunders, Jr. *
* *
* vs. *
* *
* Richard Henry Saunders, Jr., an in- *
* fant under the age of twenty-one *
* years, Tom Bynum, Floy S. Saunders, *
* Josie Holland, Stella Beale, Lucy *
* Cross, A. H. Saunders, Minnie Cutchin, *
* Gabie Howell, S. E. Saunders, H. P. *
* Saunders and J. P. Saunders. *
* *

This day this cause, which has regularly matured at rules, according to law, came on to be heard on the bill of the complainant, verified by oath thereto, and exhibits therewith filed, the answer of John C. Parker, Jr., Guardian ad Litem, a discreet and competent attorney at law, duly assigned at rules, according to law, to defend the interest of the infant defendant, Richard Henry Saunders, Jr., this day filed by leave of court, and his own ^{as such guardian ad litem} answer, on oath, to the bill of complaint, to which answers the complainant replies generally; the adult defendants, Tom Bynum, Floy S. Saunders, Josie Holland, Stella Beale, Lucy S. Cross, A. H. Saunders, Minnie Cutchin, Gabie Howell, S. E. Saunders, H. P. Saunders and J. P. Saunders, on whom process has been duly served, still failing to appear and plead, answer or demur, the said bill was taken for confessed as to them, and was argued by counsel:

On consideration whereof, the Court doth adjudge, order and decree that this cause be referred to one of the Commissioners of this Court who is directed to inquire and report to the Court as follows:

(1) Of what estate, real and personal, the infant defendant, Richard Henry Saunders, Jr., is possessed or entitled and what is his respective share or interest therein, where such estate is situated and what is its fee-simple and annual value:

(2) Whether the interest of the said infant defendant

will be promoted by a sale of the real estate in the bill mentioned, or any part thereof, and an investment of the proceeds of sale in other property:

(3) Whether the rights of any person will be violated by such sale and investment:

(4) Who would be the heirs at law or distributees of the infant defendant, if he were dead, and whether all such persons are properly before the Court in this cause:

(5) Whether there are any liens for delinquent taxes, or otherwise, binding the said property:

(6) Whether the sale of the said real estate on the terms and conditions set out in the contract made between Richard H. Saunders, and Tom Bynum is a good and fair sale for the said property.

(7) Any other matter deemed pertinent by the Commissioner, or required to be stated by any party in interest.

x

Saunders, Geo

-R- 1st Decree

Saunders et al. ^{and}
Byrum.

Enter Jan. 22. 1921.

James L. McElmore,

Chancery Order Book 5,
page 321.

E. FRANK STORY
ATTORNEY AT LAW
OFFICES
COURTLAND AND FRANKLIN
VIRGINIA

VIRGINIA: IN THE CIRCUIT COURT OF HANSEMOND COUNTY:

 * Saunders, Gdn. *
 * *
 * vs. *
 * *
 * Saunders et als. *
 * and Bynum *
 * *

This day this cause came on to be further heard on the papers formerly read, and upon the report of E. Frank Story, Special Commissioner appointed by a decree entered in this cause on the 27th day of June, 1921, which said report is in part as follows:

"That in obedience to the directions contained in the said decree he, your said Special Commissioner, caused to be executed by the purchaser, Tom Bynum, of the property in this cause mentioned and described, a certain deed of trust on the said property, securing the sum of \$12,956.40, the amount due for the purchase price of the said real estate, evidenced by two certain bonds, one for the principal sum of \$4,318.80, representing one-third of the purchase price of the said real estate, made payable to Mrs. Floy S. Saunders, (Widow of Richard H. Saunders, deceased, representing her one-third dower interest in the said funds), the other bond for the principal sum of \$8,637.60, representing the remaining two-thirds of the purchase price, made payable to Floy S. Saunders, Guardian for Richard H. Saunders, Jr., both of said bonds bearing legal interest from the 1st day of January, 1921, payable on demand, which said two bonds were delivered to the said Floy S. Saunders in her personal right and as Guardian of Richard H. Saunders, Jr. aforesaid, respectively, receipts therefor having been taken and same are herewith filed as a part of this report.

That upon the execution of the aforesaid trust deed and bonds by the purchaser, Tom Bynum, the Special Commissioner executed to him a deed for the said property, with special warranty of title, which said deed and trust deed have been duly recorded in the Clerk's Office of the Circuit Court of Hansemond County, Virginia, as evidenced by receipts of G. H. Bunting, Clerk, also herewith filed as a part of this report.

Your Commissioner further reports that the said Floy S. Saunders, in her individual right and as Guardian aforesaid, has paid to him the sum of \$352.00, representing the fee allowed him by the Court and the costs of this suit, all of which has been distributed as follows:

To-G. H. Bunting, Clerk, his costs,	\$10.00
" Sheriff for serving summons,	9.00
" M. Anderson Maxey, Comr. in Chancery,	20.00
" Internal revenue on deed,	13.00
" E. Frank Story, Atty. fee allowed by the Court,	300.00
Making a total of,.....	\$352.00

All of which said doings and transactions were had and

done in accordance with the specific directions contained in the aforesaid decree of June 27th, 1921.

Respectfully submitted this 30th day of September, 1921.

(Signed) M. Frank Story,
Special Commissioner."

This day filed by leave of Court, to which report there is no exception, and was argued by counsel:

On consideration whereof, the Court doth approve and confirm the said report, and it appearing that nothing further remains to be done in this cause it is directed that same be removed from the docket.

VIRGINIA: IN THE CIRCUIT COURT OF NANSEMOND COUNTY:

 * Saunders, Gdn. *
 * *
 * vs. *
 * *
 * Saunders et als. *
 * and Bynum *
 * *

This day this cause came on to be further heard on the papers formerly read, and upon the report of E. Frank Story, Special Commissioner appointed by a decree entered in this cause on the 27th day of June, 1921, which said report is in part as follows:

"That in obedience to the directions contained in the said decree he, your said Special Commissioner, caused to be executed by the purchaser, Tom Bynum, of the property in this cause mentioned and described, a certain deed of trust on the said property, securing the sum of \$12,956.40, the amount due for the purchase price of the said real estate, evidenced by two certain bonds, one for the principal sum of \$4,318.80, representing one-third of the purchase price of the said real estate, made payable to Mrs. Floy S. Saunders, (Widow of Richard H. Saunders, deceased, representing her one-third dower interest in the said funds), the other bond for the principal sum of \$8,637.60, representing the remaining two-thirds of the purchase price, made payable to Floy S. Saunders, Guardian for Richard H. Saunders, Jr., both of said bonds bearing legal interest from the 1st day of January, 1921, payable on demand, which said two bonds were delivered to the said Floy S. Saunders in her personal right and as Guardian of Richard H. Saunders, Jr. aforesaid, respectively, receipts therefor having been taken and same are herewith filed as a part of this report.

That upon the execution of the aforesaid trust deed and bonds by the purchaser, Tom Bynum, the Special Commissioner executed to him a deed for the said property, with special warranty of title, which said deed and trust deed have been duly recorded in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, as evidenced by receipts of G. E. Bunting, Clerk, also herewith filed as a part of this report.

Your Commissioner further reports that the said Floy S. Saunders, in her individual right and as Guardian aforesaid, has paid to him the sum of \$352.00, representing the fee allowed him by the Court and the costs of this suit, all of which has been distributed as follows:

To-G. E. Bunting, Clerk, his costs,	\$10.00
" Sheriff for serving summons,	9.00
" M. Anderson Maxey, Comr. in Chancery,	20.00
" Internal revenue on deed,	13.00
" E. Frank Story, Atty. fee allowed by the Court,	300.00
Making a total of,.....	<u>\$352.00</u>

All of which said doings and transactions were had and

done in accordance with the specific directions contained in the aforesaid decree of June 27th, 1921.

Respectfully submitted this 30th day of September, 1921.

(Signed) E. Frank Story,
Special Commissioner."

This day filed by leave of Court, to which report there is no exception, and was argued by counsel:

On consideration whereof, the Court doth approve and confirm the said report, and it appearing that nothing further remains to be done in this cause it is ordered that same be removed from the docket.

Sanders, Edw.

- 7-3 Decree

Sanders et al. and
Byrum.

Enter Jan. 14. 1925

James L. McNamee

5-78.513

Exam.

E. FRANK STORY
ATTORNEY AT LAW
OFFICES
COURTLAND AND FRANKLIN
VIRGINIA

 * Saunders, Guardian *
 *
 * vs. *
 *
 * Saunders et als. and *
 * Bynum *

The answer of Richard Henry Saunders, Jr., an infant under the age of twenty-one years, by John C. Parker, Jr., his guardian ad litem assigned to defend him in this suit, and the answer of the said John C. Parker, Jr., guardian ad litem to the said infant defendant, to a bill of complaint exhibited against the said infant and others by Floy S. Saunders, Guardian for Richard Henry Saunders, Jr., in the Circuit Court of Nansemond County, Virginia:

For answer to the said bill the said infant defendant by his said guardian ad litem, answers and says that being of tender years he does not know what his true interest is in relation to the subject-matter of the said bill, nor does he know whether the statements therein contained are true or not. He confides the protection of his interest therein to the care of the Court. And the said guardian ad litem of the said infant defendant for answer to the said bill answers and says that he knows nothing of the truth or falsity of the statements in the said bill contained. He prays full protection for the infant defendant.

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

RICHARD HENRY SAUNDERS, Jr.,

By John C. Parker, Jr.
 GUARDIAN AD LITEM

John C. Parker, Jr.
 GUARDIAN AD LITEM OF THE SAID INFANT

State of Virginia,
 Southampton County, to-wit:

Sworn to before me in my county aforesaid by John C. Parker, Jr., Guardian ad Litem, as aforesaid, this 13 day of January, 1921.

Rich M. Owens
 NOTARY PUBLIC

Saunders, Geo.

N. 3. Ann. of Geo. ad.
Liter.

Saunders et al. and
Byrnes.

1921. Jan. filed Jan.

E. FRANK STORY
ATTORNEY AT LAW
OFFICES
COURTLAND AND FRANKLIN
VIRGINIA

Received of Tom Bynum \$800.00 as part payment on my farm sold to him this 18th day of Dec. 1919 known as the Jacob Austin farm, less that part sold to Ernest Cross & Willie Austin farm, including also the remainder of my land bordering the mill pond which has not been sold to Delia Hayes and Ernest Cross. It is agreed that Tom Bynum is to pay for this land \$13000.00 and this \$800.00 is part payment on same said land. Further payments are to be credited on this agreement until deed is passed.

(Signed) R. H. Saunders

(") Floy S. Saunders

Dec. 18-19

Thirteen Thousand Dollars. Eight Hundred paid this day leaving balance of \$12,200.00

Sanders, Guardian

- R. 3 "Exhibit B"

Sanders et al. and
Byrnes.

E. FRANK STORY
ATTORNEY AT LAW
COURTLAND, VIRGINIA
BRANCH OFFICE AT FRANKLIN, VIRGINIA

TO THE HONORABLE JAMES L. MOLEMORE, JUDGE OF THE CIRCUIT
COURT OF NANSEMOND COUNTY, VIRGINIA:

=====

Humbly complaining, your complainant, Floy S. Saunders, Guardian for Richard Henry Saunders, Jr., an infant, who qualified as such Guardian in your Honor's Court on the 30th day of October, 1920, as will more fully appear from a certificate of the Clerk of the Court, showing the same, herewith filed marked exhibit "A", and prayed to be taken and read as a part of this bill,- sheweth unto the Court the following cause of complaint:

That the late R. H. Saunders, who departed this life intestate on the 24 day of October, 1920, leaving as his sole heirs at law, a widow and the aforesaid infant child, Richard Henry Saunders, Jr., of the age of twenty-two months, was, during his life-time and at the time of his death, seised and possessed of a certain tract or parcel of land generally described as follows:

That certain tract or parcel of land, contracted to be sold by the said R. H. Saunders during his life-time to Tom Bynum, estimated to contain about _____ acres, known as a part of the "Jacob Austin farm", and bounded by the lands of Ernest Cross, the Mill Pond, Delia Hayes and others.

Your complainant sheweth unto the Court, however, that the boundaries to the aforesaid tract or parcel of land are not very specifically defined and she is of the opinion that it will be necessary to have a survey made of the said property before a deed is executed therefor.

That in addition to his interest in the foregoing real estate, the said infant is seised and possessed in fee-simple, subject to the dower interest of his mother, of certain other real estate lying situate and being in Nansemond County, Virginia, the estimated value of which, as a whole, that is, including the dower interest of his mother, is about \$36,000.00, and consists:

First: Of those three certain lots, tracts or parcels of land fully set forth and described in a certain bill in Chancery filed in a certain suit now pending in your Honor's

Court, generally styled, Saunders, Guardian vs. Saunders et als. reference to which is hereby generally and specially made for a full and accurate description of the said real estate:

Second: That certain other tract or parcel of land fully set forth and described in the bill of complaint filed in another certain suit in equity, now pending in your Honor's Court, generally styled, Saunders, Guardian vs. Saunders et als. and Davidson, reference to which said bill of complaint is hereby generally and specially made for a full and accurate description of the said property:

Third: An undivided one-third interest, subject to the lien of a certain trust deed, in a certain tract or parcel of land fully set forth and described in the bill of complaint filed in another certain suit in equity now pending in your Honor's Court, generally styled, Saunders, Guardian et als. vs. Saunders et als., reference to which said bill of complaint is hereby generally and specially made for a full and accurate description of the said property.

That the said infant has personal property of the approximate value of \$ 5000.00, and that he has no other property.

Your complainant further showeth unto the Court that prior to the death of R. H. Saunders he, together with his wife, Floy S. Saunders, entered into an agreement with one Tom Bynum for the sale of the aforesaid tract or parcel of land, a copy of which contract, together with the receipts evidencing certain payments made thereon, is herewith filed, marked "Exhibit B", and prayed to be taken and read as a part of this bill; that from said agreement it will be seen that the original purchase price of the said property was Thirteen Thousand (\$13,000.00) Dollars: that payments have been made thereon reducing the said amount to Twelve Thousand Two Hundred (\$12,200.00) Dollars, as of December 18th, 1919; that it was mutually understood and agreed by and between the parties that liberal terms should be extended the said purchaser for the remainder due on the said contract.

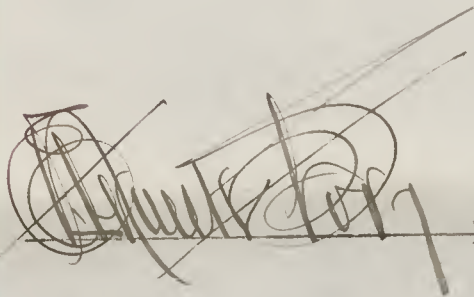
Your complainant, as Guardian of the said infant child, believes and alleges that it will be to the interest of her said ward to sell the said tract or parcel of land for the price in the said contract stated; that the interest on the said purchase price will yield a greater revenue than the rental of the said property.

Your complainant further sheweth unto the Court that if the said infant were dead, the following persons would be his heirs or distributees, namely, Floy S. Saunders, his mother, and his uncles, A. H. Saunders, S. E. Saunders, H. P. Saunders and J. P. Saunders, and his aunts, Josie Holland, Stella Beale, Lucy S. Cross, Minnie Cutchin and Gabie Howell.

In tender consideration of the premises, and forasmuch as your complainants are remediless therein, save in a court of equity, where such matters are alone and properly cognizable, your complainant prays that the said Richard Henry Saunders, Jr., an infant under the age of twenty-one years, Floy S. Saunders, A. H. Saunders, S. E. Saunders, H. P. Saunders, J. P. Saunders, Josie Holland, Stella Beale, Lucy S. Cross, Minnie Cutchin, Gabie Howell and Tom Bynum, may be made parties defendant to this bill and required to answer the same, the infant by his guardian ad litem, and the adults in proper person, though not under oath, which is hereby waived; that a guardian ad litem may be assigned the said infant to defend his interest in this suit; that the said land may be decreed to be sold, and the proceeds invested as the Court shall direct; that all proper allowances and counsel's fees may be made in this suit; that all proper accounts may be taken, inquiries directed, and such other and further and general relief may be granted as to equity shall seem meet.

And your complainant will ever pray, etc.

Floy S. Saunders



STATE OF VIRGINIA, (
Nansemond County, (to-wit:
(

I, W. C. Leather a notary public in and
for the county aforesaid, in the State of Virginia, do hereby cer-
tify that Floy S. Saunders, the complainant in the above suit,
this day personally appeared before me in my County aforesaid, and
made oath that she believes the several statements made in the
foregoing bill to be true.

Given under my hand this 22nd day of December, 1920.

W. C. Leather

My commission expires Sept. 13th, 1925

NOTARY PUBLIC

Saunders, Gordon

-R. 3/ Bill in Chancery

Saunders et als. ^{and}

Bynum.

Filed Dec. 20, 1920.

H. E. Benthin,
Clk

E. FRANK STORY
ATTORNEY AT LAW
OFFICES
COURTLAND AND FRANKLIN
VIRGINIA