

1925-014
Norismond Co (Suffolk) Chancery Causes: Gillie May Steinhardt by et al vs Alex Steinhardt

Derby, Howell, Jones

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA.

Gillie May Steinhardt,
an infant under the age
of 21 years, who sues by
her next friend and father,
J. P. Derby

vs.

Alex Steinhardt

In Chancery. To Second February Rules, the third Monday in February, 1925.

11⁰⁰ PL

2/5/25

John N. Sebull for }
E. L. Beach } -9-

Issued 2-5-25

Rule notes on reverse side

Process issued Dec. 7. Returned to
Prob. Rules, 3rd Monday, 1855,
Prob. Rules. Process returned & executed,
Bills filed & decrees nisi.
March Rules. 1st Monday 1855
decrees nisi confirmed & cause
set for hearing

J. H. Montgomery, Clerk

E. L. BEALE
ATTORNEY AT LAW
FRANKLIN, VIRGINIA
EXAMINER OF RECORDS SECOND JUDICIAL CIRCUIT

Feb. 5th. 1925.

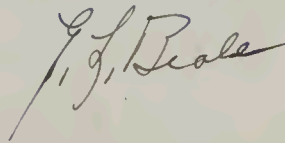
Mr. Geo. E. Bunting, Clerk,
Suffolk, Va.,

Dear Sir:-

I am enclosing memo. of suit, Steinhardt, etc. vs. Steinhardt, together with notice to take depositions. Please give the notices to the Sheriff when you give him the subpoena in chancery to serve so as to save him an extra trip.

I am enclosing Mr. Derby's check for \$11.00 as a deposit for your costs and for the Sheriff. Please pay Mr. Rawls out of this check for his services, and if this is not sufficient let me know and I will send you the remainder. Thanking you, I am,

Yours very truly,



CHANCERY SUMMONS

The Commonwealth of Virginia.

TO THE SHERIFF OF NANSEMOND COUNTY---GREETING:

You are Hereby Commanded to Summon Alex Steinhardt

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 February, 1925, to answer

Bill in Chancery, exhibited against him

in the said Court by Gillie May Steinhardt, an infant under the age of 21
years, who sues by her next friend and father, J.P. Derby

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this 7th day of
February, 19 25, in the 1919th year of the Commonwealth.

A Copy--Teste:

Clerk

Teste:

Clerk

Executed this 10 day of February, 1915 by delivering a true copy of the with-
in process to Alex Steinhardt in Nansemond county, Ver.

E. L. Beale Sheriff
in person, in the County of Nansemond, State of Virginia
J. C. Taylor Deputy

Sheriff

John N. Sebrell and

E. L. Beale

p. q.

Gille May Steinhardt, etc

vs.

In Chancery

Alex Steinhardt

1925

February

Rules

Third

Monday.

NANSEMOND COUNTY COURT,

Process Book, No.

Page

Gillie May Steinhardt, an infant whose
sues by her next friend and father, J.
P. Derby

v.

Alex Steinhardt

The depositions of Gillie May Steinhardt, and others, taken before me, B. W. Council, a Notary Public for the County of Nansemond, in the State of Virginia, pursuant to notice hereto annexed, at Holland, in Nansemond County, Virginia, on the 2nd day of May, 1925, between the hours of 10:00 o'clock a.m. and 5:00 o'clock p.m. to be read as evidence in behalf of Gillie May Steinhardt in a certain suit in equity, depending in the Circuit Court of Nansemond County, Virginia, wherein the said Gillie May Steinhardt is plaintiff by her next friend and father J. P. Derby, and Alex Steinhardt is defendant.

Present E. L. Beale attorney for complainant.

The witness, Gillie May Steinhardt, being duly sworn deposes as follows:

Please state your name, age, residence and are you complainant in this suit asking for divorce from your husband, Alex Steinhardt?

A. Gillie May Steinhardt, I was 21 years old April 20th. 1925, reside with my father, Mr. J. P. Derby in Nansemond County, Virginia, and I am the complainant in this suit.

Q. Please state when you and Alex Steinhardt were married.

A. October 15th. 1921.

Q. Are you both now living together as husband and wife?

A. No.

Q. How long have you and he been separated and living apart?

A. Ever since October 15th. 1921, which is the same day that we were married. He left me on that day and has not lived with me since.

Q. Please state if you will what brought about this separation so soon after you were married.

A. Well, we had been going together for about eighteen months, and I was very much in love with him and being young I suppose I put too much confidence in him and he betrayed my confidence. We became engaged shortly after he began to go with me. He was to see me every Sunday and sometimes two or three times during the week. I had promised to marry him, and he betrayed my confidence and we became intimate. He repeatedly promised to marry me and told me that if anything happened he would surely marry me. As I said I was very much in love with him and had confidence in him. I suppose that it was about four months after I became pregnant by him that my mother found it out. She then told my father and he got after me and also Alex Steinhardt about it on Sunday when he came to see me. He then on that Sunday acknowledged his fault and betrayal and in the presence of my father and mother promised again

2.

to marry me, but would not say when he would. My father is a mighty good man and thought the easiest way was the best way and decided to wait a day or two to see what he was going to do. He waited until the following Saturday and Mr. Steinhardt had not been to see me again, so my father went to look for him. He found him in Holland and he went with my father to Suffolk to get the marriage license and when they came back they stopped by Holland to get Mr. Paulette to perform the marriage. My father, Mr. Steinhardt and Mr. Paulette then all came home together and we were married at home on that same day. As soon as we were married Mr. Steinhardt said he had to go home to see his mother and would be back. He has never been back to see me since we were married and I have never seen him to speak to him since.

Q. Do you think that your husband had any right to believe or even think that you had been intimate with anyone else than himself.

A. No I do not. He knows very well that I have not, and as a matter of fact he told my father that he knew that he was the only one.

Q. Have you ever said or done anything to cause him to desert you and treat you in the manner that he has?

A. No sir, I have not.

Q. Has he ever offered to take care of you or your baby since he was born?

A. No sir.

Q. Have you ever made an effort in any manner to have Mr. Alex Steinhardt to live with you since your marriage?

A. Well, after he did not come back as he said that he would we naturally became apprehensive as to what his intentions were. My father advised with several people as to what was the best thing to do. I was expecting our baby and he had wilfully neglected me and deserted me. My father and mother were as good to me as they could be and they naturally thought it very strange that he did not come back to even see me after he had acknowledged to them his betrayal, so my father then thought it best to bring suit to compel him to take care of me and our baby, and if possible to get him to live with me. We found out that he did not intend to ever live with me so I waited to bring suit for divorce at the proper time.

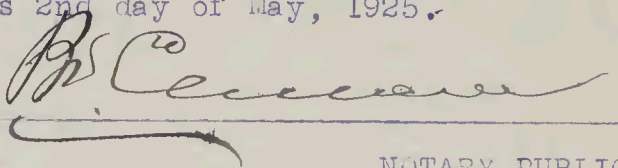
And further this deponent saith not.

Ellie May Steinhardt

State of Virginia,
County of Nansemond, to-wit:

I, B. W. Council a Notary Public in and for the County aforesaid
in the State of Virginia do hereby certify that the foregoing dep-
ositions of Gillie May Steinhardt were duly taken, reduced to writ-
ing and signed by the witness before me at the place and time there-
in mentioned pursuant to the annexed notice.

In witness whereof I have hereunto set my hand at Holland, in
Nansemond County, Virginia, this 2nd day of May, 1925.



NOTARY PUBLIC.

221927

To Alex Steinhardt:

Please take notice that on the 2nd day of May, 1925, in the office of B. W. Council, a Notary Public, in the Town of Holland, in Nansemond County, Virginia, between the hours of 10:00 o'clock a.m. and 5:00 o'clock p.m., of that day, I shall proceed to take the depositions of Gillie May Steinhardt, and perhaps of other persons, to be read as evidence in behalf of the said Gillie May Steinhardt, in a certain suit in equity in which she, who sues by her next friend and father J. P. Derby, is seeking to obtain an absolute divorce on the grounds of desertion, in which suit you are defendant; and if from any cause the taking of the said depositions be not commenced, or, if commenced, be not concluded, on that day, the taking thereof will be adjourned from day to day, at the same place and between the same hours, until the same shall be completed.

Given under my hand this 24th day of April, 1925.

Gillie May Steinhardt,
an Infant under the age
of 21 years who sues by
her next friend and father,
J. P. Derby,

By

J. L. Bean & Geo. M. Sebell Jr.
Counsel.

Notice to take Deposition

Steinhardt, by Debye.

vs.

Steinhardt

J. R. Raulo Const.
for Messrs. Debye & Co.
have this day served
the within Summons
by leaving a true
Copy in the hands
of Alvin Steinhardt
Defendant.

This the 27th day
April - 1925

J. R. Raulo
Const.

Sworn to before me this
11th day of May 1925

J. A. McQuinn

33 The case of Walker v. Walker seems to
- apply to this case. 120 Pa. 410. I do not
think sufficient evidence as to the de-
- scription or how it was brought about is shown.

J. L. M.

COPY

MARRIAGE LICENSE

Virginia Nansemond County

to-wit:

To Any Person Licensed to Celebrate Marriages:

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

Alex Steinhardt

and Gillie May Derby

Given under my hand, as Clerk of the Circuit Court of Nansemond County (or City) this 15th day of October, 1921

G.E. Bunting,

Clerk.

MARRIAGE CERTIFICATE

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

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

Date of Marriage October 15, 1921

Place of Marriage Nansemond County

Alex Steinhardt

FULL NAMES OF PARTIES

and

Gille May Derby

Age of Husband 18 years; Condition (single, widowed or divorced) Single

Age of Wife 18 years; Condition (single, widowed or divorced) "

Race (White or Colored) White

(PRESENT)

Husband's Place of Birth Nansemond County Mailing Address Nansemond County

Wife's Place of Birth Southampton Co. Mailing Address " "

Names of Husband Henry Steinhardt and Mary E. his wife

Parents Wife J.P. Derby and Nannie " "

Occupation of Husband Farmer

Given under my hand this 15th day of October, 1921

G.E. Bunting,

Clerk.

Certificate of Time and Place of Marriage

I, L.F. Paulette

a Minister

of the Baptist

Church, or religious order of that name, do certify that on the 15th day of Oct., 1921, at South Quay, Virginia, under authority of the above License, I joined together in the Holy State of Matrimony the persons named and described therein. I qualified and gave bond according to law authorizing me to celebrate the rites of marriage in the County (or City) of Norfolk, State of Virginia.

Given under my hand this 17th day of Oct., 1921

A true copy:

Teste:

L.F. Paulette

Clerk

(Person who performs ceremony sign here.)

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

County (or City) Nansemond

Alex Steinhardt
Husband

and { **Marriage License**

Gillie May Derby
Wife

Date of Issue Oct. 15, 1921

Marriage Register No. 3 Page 151

11

Exhibit A"

Gillie May Steinhardt, an infant, who sues
by her next friend and father, J. P. Derby.
v.

Alex Steinhardt

The depositions of J. P. Derby and others, taken before me, B. W. Council a Notary Public for the County of Nansemond, in the State of Virginia, pursuant to notice hereto annexed, at Holland, in Nansemond County, Virginia, on the 21st day of February, 1925, between the hours of 10;00 o'clock a.m and 5;00 o'clock p.m. to be read as evidence in behalf of Gillie May Steinhardt in a certain suit in equity, depending in the Circuit Court of Nansemond County Virginia, wherein the said Gillie May Steinhardt is plaintiff by her next friend and father, J. P. Derby, and Alex Steinhardt is defendant.

Present: E. L. Beale attorney for complainant.

The witness, J. P. Derby, being duly sworn deposes as follows:

Please state your name, age, residence, occupation, and do you know the parties to this suit?

A. J. P. Derby, 50 years of age, live in Nansemond County, Virginia, and a farmer and I know the parties.

Q. Please state whether the complainant in this suit, Mrs. Gillie May Steinhardt is your daughter.

A. Yes she is.

Q. Please state her age.

A. She will be 21 years old on the 20th of April, 1925.

Q. Please state when your daughter, Gillie May Steinhardt and Alex Steinhardt were married and where.

A. They were married on October 15th. 1921 in Nansemond Co. Va.

Q. Have they been living together as husband and wife since their marriage up to the present time?

A. No, they have not lived together since that time.

Q. Why is it that they are not living together as husband and wife?

A. Because Alex Steinhardt deserted her and left her.

Q. When was it that he deserted and left her?

A. On October 15th. 1921.

Q. Have they ever since that date, Oct. 15th. 1921, lived together as husband and wife?

A. No.

Q. Why was it that Alex Steinhardt left his wife, Gillie May Steinhardt?

A. Well, he said that he was going home, and I told him that he could come back whenever he wanted to and make my home his home.

2.

I saw him shortly after and I understood that his mother was so opposed to the marriage that she persuaded him not to go back to his wife.

Q. Was there any just cause why he should desert his wife and refuse and decline to live with her and take care of her?

A. None in the world that I know of. My daughter did not do anything to him that I know of to make him leave her.

Q. Has Alex Steinhardt taken care of his wife since he deserted her?

A. No sir.

Q. Who has taken care of her since the desertion?

A. I have have. She has been living with me ever since.

Q. Are there any children by this marriage?

A. Yes, one boy.

Q. Who has the custody and care and upkeek of this boy?

A. I have.

Q. Has Alex Steinhardt contributed anything to his support?

A. No sir.

Q. How long have you and your daughter, Gillie May Steinhardt been living in Nansemond County, Virginia?

A. Five years.

Q. Who is the proper person to have the care and custody of this child of Alex Steinhardt and Gillie May Steinhardt?

A. I think that his mother is the proper person, to have him.

Q. Has Alex Steinhardt ever tried to get his wife to live with him at his home since he left her?

A. No.

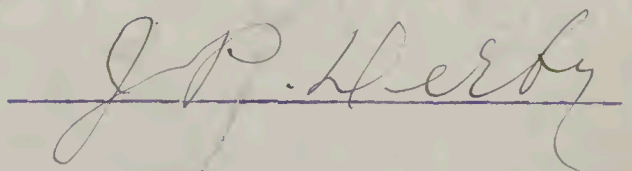
Q. Who do you consider at fault why he does not live with his wife?

A. I think that it sole his fault and the fault of his mother.

Q. Do you think that your daughter, Gillie May Steinhardt, is in any way at fault why he left her and declines to live with her?

A. No sir, I do not.

And further this deponent saith not.

A handwritten signature in cursive script, reading "J. P. Herby", is written over a horizontal line.

3.

The witness, E. J. Howell, being duly sworn deposes as follows:

Please state your name, age, residence, occupation and do you know the parties to this suit?

A. E. J. Howell, 47 years old, live in Holland, Va., farmer and I know the parties.

Q. Are Alex Steinhardt and his wife Gillie May Steinhardt now living together as husband and wife?

A. No.

Q. How long have they been separated?

A. For more than three years they have not lived together.

Q. Do you know why they are not living together as husband and wife?

A. Because he left her and declined to live with her.

Q. Do you know when it was that he left her?

A. I do not remember the date, but they never have lived together since they were married.

Q. Do you know why Alex Steinhardt left his wife, Gillie May Steinhardt?

A. I think that it is because his mother raised so much disturbance on account of the marriage and she persuaded him to leave her and not to live with his wife.

Q. Do you know whether there are any children by their marriage?

A. Yes, there is one boy and he resembles the Steinhardt family.

Q. How long have you known Mr. Derby and his daughter, Gillie May Steinhardt?

A. About five years. They have been living on my farm.

Q. Do you think that Gillie May Steinhardt is in any way responsible for her husband Alex Steinhardt deserting his wife.

A. No, I do not think so and believe that she would have lived with him if he would have let her.

Q. Do you think that he had any just cause for deserting her?

A. No, I do not.

And further this deponent saith not.

E. J. Howell

4.

The witness, P. A. Jones, being duly sworn deposes and says:

Please state your name, age, residence, occupation and do you know the parties to this suit?

A. P. A. Jones, of legal age, live in Nansemond County, Va., am a farmer, and I know the parties to this suit.

Q. How far do you live from Mr. J. P. Derby and far do you live from Mr. Alex Steinhardt?

A. I live about one quarter of a mile from Mr. Derby and about and about three miles from Alex Steinhardt.

Q. Are Alex Steinhardt and Gille May Steinhardt living together as husband and wife?

A. No.

Q. How long have they been separated?

A. Ever since they have been married. I think that they were married in October, 1921.

Q. Why is it that they are not living together as husband and wife?

A. Because he left her.

Q. Do you know why he left his wife, Gillie May Steinhardt?

A. He just deserted her without any just cause and declined to live with her ever since they were married.

Q. Where does Gillie May Steinhardt live and where does Alex Steinhardt live?

A. Mrs Gillie May Steinhardt lives with her father about a quarter of a mile from my home and Alex Steinhardt lives with his mother about three miles from my home.

Q. Have they lived together as husband and wife since they were married?

A. No.

Q. Are there any children by this marriage?

A. Yes, one boy.

Q. Who has charge and custody of this child?

A. The child's mother.

Q. Who is the proper parent to have the custody of this child?

A. I think that the boy's mother, Mrs. Gillie May Steinhardt is the proper one.

Q. Do you know whether Alex Steinhardt has contributed to the support of his wife and child since the marriage and the birth of this boy?

A. No not to my knowledge.

Q. Have you ever seen Alex Steinhardt visit his wife or child since their marriage and the birth of this child?

A. No. I think that it is just a plain case of desertion and aban-

5.

document on the part of the husband, and without any just cause.

And further this deponent saith not.

P. A. Jones

State of Virginia,
County of Nansemond, to-wit:

I, B. W. Council a Notary Public for the County aforesaid in the State of Virginia do hereby certify that the foregoing depositions of J. P. Derby, E. J. Howell and P. A. Jones were duly taken, reduced to writing and signed by the witnesses respectively before me at the place and time therein mentioned pursuant to the annexed notice.

In witness whereof I have hereunto set my hand at Holland, in Nansemond County, Virginia, this 21st day of February, 1925.
My Commission expires

22 7
B. W. Council
NOTARY PUBLIC.

22 7

To Alex Steinhardt:

Take notice that on the 21st day of February, 1925, in the office of B. W. Council, a Notary Public, in the Town of Holland, in Nansemond County, Virginia, between the hours of 10;00 o'clock a.m. and 5;00 o'clock p.m., of that day, I shall proceed to take the depositions of J. P. Derby and others, to be read as evidence in my behalf, in a certain suit in equity, depending in the Circuit Court of Nansemond County, Virginia, wherein I am complainant and you are defendant; and if from any cause the taking of the said depositions be not commenced, or, if commenced, be not concluded, on that day, the taking thereof will be adjourned from day to day, at the same place, and between the same hours, until the same shall be completed.

Given under my hand this 6th day of February, 1925.

Gillie May Steinhardt,
an infant under the age
of 21 years who sues by
her next friend and father,
J. P. Derby,

By Wm. H. Selrell Jr. & L. B. Bear
Counsel.

Gellie May Steinhardt, who
sues &

vs.

Alex Steinhardt

Notice to take depositions

Executed This 10th of
February 1925 by deposing
a true copy of the within
process to Alex Steinhardt
in person in Harrison
County W. Va.

E. B. Rawles, Sheriff

By J. C. Taylor

Deputy S.

E. L. BEALE
ATTORNEY AT LAW
FRANKLIN, VIRGINIA
EXAMINER OF RECORDS SECOND JUDICIAL CIRCUIT

Feb. 21st. 1925.

Mr. E. B. Rawls, Sheriff,
Suffolk, Va.,

Dear Sir:-

Please mail me the paper that you served on Mr. Alex Steinhardt in Holland. I mean the one that was the notice to take depositions in the office of Mr. B. W. Council for today.

As I had not received it back I thought you left it with Mr. Ben Council and as it is needed to attach to the depositions we took today I want you to kindly mail it to me. It is on a long legal cap sheet of paper, and your return thereon is the notice to take depositions and the same should be filed with the depositions taken today.

Thanking you, I am,

Yours very truly,

E. L. Beale

The above mentioned paper which is enclosed was delivered to Mr. G. E. Bunting, Clerk, after being executed,

Yours truly

E. B. Rawls

2/24/25-

Gillie May Steinhardt or
by next friend

vs.

Alex Steinhardt

Depositions

Mar 9, 1925 - Del's

H. B. Smith,
Clerk

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

GILLIE MAY STEINHARDT,
an infant, who sues by her next
friend and father, J. P. Derby,

v.

ALEX STEINHARDT.

This day this cause came on to be heard on the complainant's bill and exhibits therewith filed, and the depositions of witnesses, and was argued by counsel.

On consideration whereof, and it appearing to the court independently of the admissions of either party in the pleadings or otherwise, that the said parties were lawfully married on the 15th day of October, 1921, and that immediately thereafter on the said October 15, 1921, the said defendant, Alex Steinhardt, did wilfully desert and abandon the said Gillie May Steinhardt, and that said desertion and abandonment has continued for more than three years and still does continue, the court doth adjudge, order and decree that the said Gillie May Steinhardt and Alex Steinhardt be divorced from the bond of matrimony which was created by the aforesaid marriage, and that the said marriage be, and the same is, hereby dissolved and annulled; and that the custody of their infant child be awarded to the said Gillie May Steinhardt with whom he shall remain.

And nothing further remaining to be done in this cause, it is ordered that the same be removed from the docket.

VIRGINIA: IN THE CIRCUIT
COURT OF NANSEMOND COUNTY.

GILLIE MAY STEINHARDT, an
infant, who sues by her
next friend and father,
J. P. Derby,

v.

ALEX STEINHARDT.

1925

DECREE.

May 11
Cuth ~~11th~~ 1925

J. L. M. Linnery
#5-7g, 543

JOHN N. SEBRELL, JR.
ATTORNEY AND COUNSELLOR AT LAW
SEABOARD BANK BUILDING
NORFOLK, VIRGINIA

Gillie May Steinhardt,
an infant under the age
of 21 years, who sues by
her next friend and father,
J. P. Derby

vs.

Alex Steinhardt.

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

Your complainant, Gillie May Steinhardt, who sues by her next
friend and father, J. P. Derby, she being an infant under the age
of 21 years, respectfully represents by her next friend and father
J. P. Derby, as follows:

1st. That the said Gillie May Steinhardt is an infant under the
age of 21 years, and on the 15th day of October, 1921, she, whose
maiden name was Gillie May Derby, was lawfully married in Nanse-
mond County, Virginia, to Alex Steinhardt, as will appear from a
certificate of marriage herewith filed, marked "Exhibit A", and
made a part of this bill; and,

2nd. That immediately after or on the date of the said marriage
the said Alex Steinhardt wilfully deserted and abandoned your
complainant, which desertion has been for a period of more than
three years, that is to say on the 15th day of October, 1921, the
said Alex Steinhardt, did voluntarily, wilfully and without any
justification whatever, leave your complainant's daughter, the said
Gillie May Steinhardt, and at the time told her that he never ex-
pected to live with her and would never return to her, and that
the said Gillie May Steinhardt has never lived with the said Alex
Steinhardt since that date; and,

3rd. That the said Gillie May Steinhardt has resided and been
domiciled in this State ever since the aforesaid marriage, and for
more than one year next preceding the commencement of this suit, and
is domiciled and now resides in this State with her said Father
J. P. Derby and has always lived with him both before and since the
said marriage; and,

4th. That the said Gillie May Steinhardt last cohabited with

the said Alex Steinhardt in the said County of Nansemond in the State of Virginia; and,

5th. That there is issue of the said marriage, a boy named, Franklin Henry Steinhardt, who is in the custody of his mother the said Gillie May Steinhardt and who has been in her custody and care ever since birth; and,

6th. That the said Gillie May Steinhardt and her son the said Franklin Henry Steinhardt have been living with the said J. P. Derby ever since the said marriage.

In considerationwhereof, and forasmuch as your complainant is remedyless in the premises save in a Court of Equity, your complainant prays that the said Alex Steinhardt may be made a party defendant to this bill, and required, but not on oath, to answer the same, the oath being hereby waived; that proper process may be issued, that a divorce from the bond of matrimony which was created by the aforesaid marriage be decreed her, the said Gillie May Steinhardt, and that the said Gillie May Steinhardt may be decreed the care and custody of her child, the said Franklin Henry Steinhardt, and that the said Gillie May Steinhardt may have all such other and further and general relief in the premises as the nature of her case may require, or to equity shall seem meet.

And your complainant will ever pray, etc.

Gillie May Steinhardt,
an infant under the age
of 21 years who sues by
her next friend and father,
J. P. Derby

X J. P. Derby

John N. Schell Jr.
E. L. P.

Counsel.

State of Virginia,
County of Southampton, to-wit:

I, J. P. Derby a Notary Public in and for the County aforesaid in the State of Virginia do hereby certify that J. P. Derby whose name is signed to the writing above this day personally appeared before me in my said county and made oath before me that the statements made therein are true and correct to the best of his

knowledge and belief. My commission expires Nov-22-1925

Given under my hand this 13th day of February, 1925.

B. Cresswell

Notary Public.

Bill in Chancery

Gillie May Steinhart
by her next friend.
vs.

Alex Steinhart.

Filed Feb. 16, 1935-

J. E. Ambry,
Clerk

E. L. BEALE

ATTORNEY AT LAW
FRANKLIN, VIRGINIA

EXAMINER OF RECORDS SECOND JUDICIAL CIRCUIT

Jon. N. Selmer &
E. L. Drake, May

Allen May Steinhardt &c
18
Alex Steinhardt

Deposit

\$11.00

2-7-25