1925-017
Nansemond Co (Suffolk) Chancery Causes: Willie McDaniel vs Ida Bell Sesoms McDaniel

Sesoms, Watson, Goodman

HUGH L. HOLLAND
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

November 28, 1923.

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

Re: Willie McDaniel
Vs: Ida Bell Sesoms McDaniel

Dear Sir:-

I hand you herewith bill of complaint to be filed in the above entitled suit. Process in this suit was returnable to First December Rules. Please let me know whether process and notice of taking depositions have been served by the Sheriff and returned to your office.

Yours very truly,

Hugh L. Holland

H/ED

Enc: 1

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA:

WILLIE MCDANIEL.....COMPLAINANT

VS) MEMORANDUM

IDA BELL SESOMS MC DANIEL.....DEFENDANT.

Please summon defemdant for complainant to First December (1923) Rules in Chancery.

p.q.

Pub Notes;

Nov. 21, 1923 Process issued, returnable 1st December Rules, 3rd Monday, 1923

Dec. Rule, 1st Monday, 1923, Process returned executed, bill filed & docket

Dec. Rules, 3rd Monday, 1923

Decree nisi confirmed & cause set for hearing

WILLIE MCDANIEL

COMPLAINANT

VS) MEMORANDUM

IDA BELL SESOMS MCDANIEL

DEFENDANT

~~Please return to:-~~

HUGH L. HOLLAND
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

CHANCERY SUMMONS

The Commonwealth of Virginia.

TO THE SHERIFF OF NANSEMOND COUNTY---GREETING:

You are Hereby Commanded to Summon Ida Bell Sessoms McDaniel

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 First Monday in December, 1923 to answer a Bill in Chancery, exhibited against her in the said Court by Willie McDaniel

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this 21st day of November, 19 23, in the ~~13~~ 148th year of the Commonwealth.

~~A Copy---Teste:~~

~~Clerk~~

Teste: G. E. Bunting Clerk

Executed on the 27 day of
Nov. 1923 within the county of
Nansemond, by delivering a
true copy of the within process
in writing, to Ida Bell Sesoms
McDaniel in person
E. B. Rawles
Sheriff of Nansemond County.

Original

Hugh L. Holland, p. q.

Willie McDaniel

v.

Ida Bell Sesoms McDaniel

vs. } In Chancery

1923

December Rules

First Monday.

NANSEMOND COUNTY COURT,

Process Book, No.

Page

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

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

... Sheriff

NOTICE OF TAKING DEPOSITIONS.

TO IDA BELL SESOMS MCDANIEL:

Take notice that on the 31st day of December, 1924, at the office of Hugh L. Holland, Attorney at Law, 200 American Bank & Trust Company Building, Suffolk, Virginia, between the hours of 10:00 A.M. and 5:00 P.M. of that date, before a Notary Public, I shall proceed to take the depositions of witnesses to be read as evidence in my behalf in a certain suit of equity, pending in the Circuit Court of Nansemond County, Virginia, in which I am complainant, and you, the defendant; and, if from any cause, the taking of the said depositions be not commenced, or if commenced, be not concluded on that date, the taking thereof will be adjourned from day to day or time to time at the same place and at the same hours until the same shall be completed.

Willie McDaniel.
By Hugh L. Holland,

Executed this 17th day of December, 1924, by calling at the usual place of abode of Ida Bell Sesoms McDaniel in Nansemond County, Virginia, and not finding her at home, I explained the purport of the above notice to Minnie Sesoms, mother of Ida Bell Sesoms McDaniel, and a member of her family over sixteen years of age, and delivered a true copy of the above notice to the said Minnie Sesoms for Ida Bell Sesoms McDaniel.

E.B. Rawles, Sheriff of Nansemond County.

By W.R. Dimmer D.S.

Willie McDaniel....Complainant

vs) Notice of taking depositions

Ida Bell Sesoms McDaniel.

Defendant.

HUGH L. HOLLAND
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

NOTICE OF TAKING DEPOSITION.

TO IDA BELL SESOMS MC DANIEL.

Take notice that on the 11th day of December, 1923, at the office of Hugh L. Holland, Attorney at Law, 200-~~03~~ American Bank & Trust Company Building, Suffolk, Virginia, between the hours of 10:00 A.M. and 5:00 P.M. of that date, before a Notary Public, I shall proceed to take the depositions of witnesses to be read as evidence in my behalf in a certain suit in equity, pending in the Circuit Court of Nansemond County, Virginia, in which I am complainant, and you, the defendant; and, if from any cause, the taking of the said depositions be not commenced, or if commenced, be not concluded on that date, the taking thereof will be adjourned from day to day or time to time at the same place and at the same hours until the same shall be completed.

Willie Mc Daniel.

BY Hugh L Holland.
p.q.
His attorney

Filed 21 Nov

Willie McDaniel

vs

Ida Bell Sessoms

McDaniel

Notice of Taking

Depositions

Original.

Executed on the 22 day of

Nov. 1922 within the county of

Nansemond, by delivering a

true copy of the ~~within~~ ~~writing~~ Notice

in writing, to Ida Bell Sessoms

McDaniels in person

E B Rawles

Sheriff of Nansemond County.

HUGH L. HOLLAND

ATTORNEY AT LAW

SUFFOLK, VIRGINIA

HUGH L. HOLLAND
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

November 20, 1923.

Mr. George E. Bunting, Clerk,
Suffolk, Virginia.

Re: Willie McDaniel
Vs: Ida Bell Sesoms McDaniel

Dear Sir:-

I hand you herewith memorandum and notice of taking depositions in this case. The defendant, Ida Bell Sesoms McDaniel, is a colored woman who lives with her father William Sesoms on the farm of Mr. S.E. Everett on the new road beyond Kingsboro. Please have process and notice of taking depositions served on defendant promptly, certainly before the first Monday in December 1923. Please advise me as soon as you receive original notice of taking depositions and process back from the Sheriff with his returns. I hand you herewith my check for $10.00 to cover writ tax and deposit.

Yours very truly,

Hugh L. Holland

H/ED

Enc: 3

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,
Willie McDaniel *and* Ida Bell Sesoms

Given under my hand, as Clerk of the Circuit *Court of* Nansemond *County (or City) this* 14th *day of* November, 19 21

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 November 14, 1921 Place of Marriage Suffolk, Va.

FULL NAMES OF PARTIES

Williw McDaniel *and* Ida Bell Sesoms

Age of Husband 17 years; Condition (single, widowed or divorced) Single

Age of Wife 15 years; Condition (single, widowed or divorced) "

Race (White or Colored) Colored

(PRESENT)

Husband's Place of Birth Portsmouth, Va. Mailing Address Nansemond County

Wife's Place of Birth Chowan Co. N.C. Mailing Address " "

Names of Parents { Husband Melvin McDaniel and Adia his wife
Wife William Sesoms and Minnie his wife

Occupation of Husband Laborer

Given under my hand this 14th day of November, 19 21.

G.E.Bunting, *Clerk.*

Certificate of Time and Place of Marriage

I, Jas.M.Copeland, a Minister of the Christian Church, or religious order of that name, do certify that on the 14th day of November, 19 21, at Suffolk, 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 Nansemond, State of Virginia.

Given under my hand this 14th day of November, 1921.

A true copy:
Teste: J.E.Bunting, Clerk

Jas.M.Copeland
(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).

No,191

County (or City) Nansemond

Willie McDaniel

Husband

and { **Marriage License**

Ida Bell Sesoms

Wife

Date of Issue November 14,1921

Marriage Register No......3.*Page*.151

Father of girl appeared
in person and certificate
of boy's mother filed

L. E. Bunting, --Clerk

The depositions of Willie McDaniel, George T. Watson and R.B. Goodman, were taken before me, C.L. Lewis, a Notary Public in and for the City of Suffolk, State of Virginia, on the 31st day of December, 1924, between the hours of 10:00 A.M. and 5:00 P.M. of that date, pursuant to due notice to defendant served in person as shown by annexed notice, according to law, to be read as evidence on behalf of the plaintiff in a certain suit in equity pending in the Circuit Court of Nansemond County, Virginia, wherein Willie McDaniel is the complainant and Ida Bell Sesoms McDaniel is the defendant.

Present:

Hugh L. Holland, counsel for plaintiff.

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

George T. Watson, being duly sworn, deposes as follows:

Q. Are you the same George T. Watson that testified in this case on December 11, 1923?

A. Yes sir I am the same fellow.

Q. You testified at that time that Ida Bell Sesoms McDaniel, wife of Willie McDaniel, left him on November 14, 1921, and had not lived with him since that time. Was that true?

A. Yes sir.

Q. Please state whether Willie McDaniel and Ida Bell Sesoms McDaniel have lived together as husband and wife at all since his marriage to her on November 14, 1921, and also since the date of your last depositions on December 11, 1923, to the present time?

A. No sir they have not lived together as husband and wife since their marriage or since the date of my last depositions on December 11, 1923, to the present time.

Q. Where do you live now and how far is that from Willie McDaniel?

A. I live on the White Marsh Road about one-half a mile from Willie McDaniel.

Q. How often do you see him?

A. I see him almost every day.

And further this deponent saith not.

Geo. T. Watson

Willie McDaniel, being duly sworn, deposes as follows:

Q. Are you the complainant in this suit?

A. Yes sir.

Q. Have you lived with your wife, Ida Bell Sesoms McDaniel, at all as husband and wife since your marriage to her on November 14, 1921?

A. No sir.

Q. You stated in your previous depositions in this case on December 11, 1925, that you had tried to get her to live with you but that she had refused to do so. Please state whether that is still your attitude and hers?

A. Yes sir, I am willing for her to come to live with me at any time but she has always refused to do so.

Q. Where do you live now and how long have you lived there?

A. I live on the White Marsh Road about four miles from Suffolk and have lived in that section ever since my marriage to Ida Bell Sesoms McDaniel, on November 14, 1921.

And further this deponent saith not.

his
Willie X McDaniel
mark

Witness:
Edna Diamond
C. L. Lewis

R.B. Goodman, being duly sworn, deposes as follows:

Q. Are you the same R.B. Goodman that testified in this case on December 11, 1923?

A. Yes sir.

Q. You testified at that time that Ida Bell Sesoms McDaniel, wife of Willie McDaniel, left him on November 14, 1921, and had not lived with him since that time. Was that true?

A. Yes sir.

Q. Where do you live now and how far is that from Willie McDaniel and Ida Bell Sesoms McDaniel?

A. I live on the New Hosier Road in Nansemond County, Virginia, about a mile and a quarter from Willie McDaniel and see him every few days. Ida Bell Sesoms McDaniel lives with her parents somewhere near Magnolia in Nansemond County, Virginia.

Q. Please state whether Willie McDaniel and Ida Bell Sesoms McDaniel have lived together as husband and wife either from November 14, 1921, to the date of your last depositions on December 11, 1923, and also whether they have lived together from December 11, 1923, until the present time?

A. During both of these times I have lived near Willie McDaniel and have known him and his wife both well. I know that they have not lived together as husband and wife any at all from the date of their marriage on November 14, 1921, until the present time.

And further this deponent saith not.

Witness:
Edna Diamond
C.R. Lewis

his
R. B X Goodman
mark

STATE OF VIRGINIA,

CITY OF SUFFOLK.....To-wit:

I, C.L. Lewis, a Notary Public, in and for the City of Suffolk, State of Virginia, do certify that the foregoing depositions of Willie McDaniel, George T. Watson, and R.B. Goodman, were duly taken, sworn to and subscribed before me at the office of Hugh L. Holland, in the City of Suffolk, Virginia, on the 31st day of December, 1924, between the hours of 10:00 A.M. and 5:00 P.M. of that date to be read as evidence on behalf of the plaintiff in a certain suit in equity pending in the Circuit Court of Nansemond County, Virginia, wherein Willie McDaniel is the complainant and Ida Bell Sesoms McDaniel is the defendant.

Given under my hand this 31st day of December, 1924.

My commission expires on the 14th day of January, 1926.

C. L. Lewis

Notary Public in and for the City of Suffolk, State of Virginia.

Willie McDaniel...Complainant

vs) Depositions

Ida Bell Sesoms McDaniel

Defendant.

HUGH L. HOLLAND
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

The depositions of Willie McDaniel, George O. Watson, George T. Watson and R.B. Goodman were taken before me, C. L. Lewis, a Notary Public in and for the City of Suffolk, State of Virginia, on the 11th day of December, 1923, between the hours of 10:00 A.M. and 5:00 P.M. of that date, pursuant to due notice to defendant served in person as shown by annexed notice, according to law, to be read as evidence on behalf of the plaintiff in a certain suit in equity pending in the Circuit Court of Nansemond County, Virginia, wherein Willie McDaniel is the complainant and Ida Bell Sesoms McDaniel is the defendant.

Present:

Hugh L. Holland, counsel for plaintiff.

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

Willie McDaniel, being duly sworn, deposes as follows:

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

A. Willie McDaniel, 20 years old, White Marsh Road, Nansemond County, Virginia, farmer.

Q. Are you the complainant in this suit?

A. Yes sir.

Q. Please state whether you and your wife Ida Bell Sesoms McDaniel are living together now?

A. No sir we are not living together now and have not lived together since our marriage in November 1921.

Q. Please state the circumstances of your marriage and separation briefly?

A. I was confined in the County Jail at the time on the charge of seducing her of which I was not guilty, I did not have any money at all and was unable to employ a lawyer to represent me. I was forced to marry her on November 14, 1921, on account of her parents. We were married in the County Jail on November 14, 1921, and immediately after the marriage we both got into an automobile together and were going to my house to live, but she stated she did not want to marry me anyhow and that she was never going to live with me and made the man driving the automobile take her to her home. I used to see her on the average of once or twice a week but we did not have anything to say to each other. In March 1922 she gave birth to a child and I went to see her at that time and invited her to come to live with me at my house, but she refused to do so. She stated again that she did not

want to marry me anyhow and that she never expected to live with me. I have asked her several times since our marriage and since March 1922 to come to my house to live with me, but she refused to do so.

Q. Where does Ida Bell Sesoms live now?

A. She lives with her mother and father in Nansemond County, Virginia.

And further this deponent saith not.

Witness
Edna Drummond
C. L. Lewis

his
Willie X McDaniel
mark

GEORGE O. WATSON, being duly sworn deposes as follows:

Q. Please state your name age residence and occupation?

A. George O. Watson, 23 years old, on White Marsh Road, Nansemond County, Virginia, farmer.

Q. How long have you known Willie McDaniel and Ida Bell Sesoms McDaniel?

A. I have been knowing Willie McDaniel ever since I can remember and have been knowing Ida Bell Sesoms McDaniel for at least ten years.

Q. Please state whether they are living together now?

A. No sir they are not.

Q. How long have they been separated and which one left the other?

A. She left him on the day of their marriage on November 14, 1921. In fact she refused to go to live with him after the marriage and they never did live together at all as husband and wife. They have not lived together since their marriage.

Q. Please state briefly the circumstances of their marriage and separation?

A. They were married in the County Jail of Nansemond County, Virginia, on November 14, 1921. He was charged with seducing her which he denied. He was advised by several people to go ahead and marry her that it would save him trouble. He did not have any money with which to employ a lawyer and married her against his wishes. I was present at the marriage myself. After the marriage both Willie McDaniel and his wife Ida Bell Sesoms McDaniel got in my car with me. Willie McDaniel had prepared a room to live in at his grandmother's house by the name of Louisa Barnes. He asked his wife Ida Bell Sesoms McDaniel to go with him to the place he had fixed up to live live at.

She stated in the automobile that she did not want to marry him anyhow and had been forced to do it by her parents and that she was never going back to live with him and that she was going back to her people to live. She made me take her back home to her people and refused at that time to go with her husband or to live with him.

Q. Please state whether to your knowledge Willie McDaniel tried at any time after that to get his wife to come home and live with him?

A. Yes sir sometime the following March, which was March 1922, his wife Ida Bell Sesoms McDaniel gave birth to a child. Willie McDaniel went to see her at that time, then she was living with her parents on the C.W. Hill farm in Nansemond County on the White Marsh Road near Saunders station. I went with him. He asked her then to come and live with him, but she told him that she was never going to live with him and would not go. I asked her myself to, as a friend of both of theirs to go back and live with him and to look over the past, but she refused to do so. She stated again that she never wanted to marry him in the beginning and that she was never going to live with him.

Q. Where does the defendant Ida Bell Sesoms McDaniel live now?

A. She lives in Nansemond County, Virginia and has lived in Nansemond County ever since her marriage in 1921.

Q. Where does Willie McDaniel live?

A. He lives in Nansemond County, Virginia, and has lived in Nansemond County ever since his marriage to Ida Bell Sesoms McDaniel.

AND FURTHER THIS DEPONETH SAITH NOT.

Geo O Watson

George T. Watson, being duly sworn, deposes as follows:

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

A. George T. Watson, 56 years old, White Marsh Road, Nansemond County, Virginia, farmer.

Q. How long have you known Willie McDaniel and Ida Bell Sesoms McDaniel?

A. I have known Willie McDaniel and Ida Bell Sesoms McDaniel both ever since I can remember.

Q. Please state whether they are living together now?

A. No sir they are not living together now. In fact they have never lived together.

Q. How long have they been separated and which one left the other?

A. She left him on the day of their marriage, which was on November 14, 1921.

Q. Please state briefly the circumstances of their marriage and separation?

A. They were married in the County Jail on November 14, 1921. Willie McDaniel was confined in the County Jail at that time on the charge of seducing her which he denied. Being unable to employ a lawyer he was forced to marry her by her parents, which was entirely against her wishes. I was not present at the marriage but met them as they were coming out of the County Jail. Willie McDaniel had prepared a place for himself and his wife to live at his grandmother's house by the name of Louisa Barnes. Ida Bell Sesoms McDaniel stated several times that she was not going to live with her husband; that she was forced to marry him because her parents made her do it and which was against her wishes. In March 1922 she gave birth to a child and Willie McDaniel went to see her at that time and asked to

come back to live with him but she said she was never going to live with him and that she did not want to marry him in the beginning but that her father and mother made her to so.

Q. Where does Ida Bell Sesoms McDaniel live now?

A. She lives in Nansemond County, Virginia, with her parents and has lived with them in Nansemond County, Virginia, ever since her marriage to Willie McDaniel.

Q. Where does Willie M6Daniel live now?

A. He lives in Nansemond County, Virginia, and has lived in Nansemond County since his marriage to Ida Bell Sesoms McDaniel.

And further this deponent saith not.

Geo. L. Walton

R.B. Goodman, being duly swwrn, deposes as follows:

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

A. R.B. Goodman, 55 years old, lives on New Hosier Road in Nansemond County, Virginia, farmer.

A. How long have you been knowing Willie McDaniel and Ida Bell Sesoms McDaniel?

A. I have been knowing Willie McDaniel and Ida Bell Sesoms McDaniel both for about ten years.

Q. Please state whether they are living together now?

A. No sir they are not living together now. They have never lived together as husband and wife since their marriage which was in November 1921.

Q. How long have they been separated and which one left the other?

A. She left him on the day of their marriage, which was on November 14, 1921.

Q. Please state briefly the circumstances of their marriage and separation?

A. They were married in the County Jail on November 14, 1921. Willie McDaniel was confined in jail at that time on the charge of seducing her which he denied. He was advised by several people to go ahead and marry her that it would save him trouble. He did not have any money at all with which to employ a lawyer to represent him and married her against her wishes. I was not present at the marriage but used to see Willie McDaniel and Ida Bell Sesoms MdDaniel on the average of once or twice a day on account of living near both of them. I used to see them often at night but Willie McDaniel stayed at his home and Ida Bell Sesoms M

cdaniel stayed at her home

with her parents. During the day they would have nothing to say to each other, Willie McDaniel had prepared a place for himself and wife to live at his grandmother's house on the White Marsh Road in Nansemond County, Virginia, but she refused to go to live there with him. I asked her myself several time to go back and live with him but she stated that she did not want to marry him and that she was forced to do so on account of her mother and father.

Q. Where does Ida Bell Sesoms McDaniel live now?

A. She lives in Nansemond County, Virginia, and has lived in Nansemond County since her marriage to Willie McDaniel.

Q. Where does Willie McDaniel live now?

A. He lives in Nansemond County, Virginia.

And further this deponent saith not.

Witness:
Edna Diamond
C. L. Lewis

R. B. x Goodman
Mark

STATE OF VIRGINIA, CITY OF SUFFOLK.....TO-WIT:

I, C.L. Lewis, a Notary Public in and for the City of Suffolk, State of Virginia, do certify that the foregoing depositions of Willie McDaniel, George O. Watson, George T. Watson and R.B. Goodman were duly taken, sworn to and subscribed before me at the office of Hugh L. Holland, in the City of Suffolk, Virginia, on the 11th day of December, 1923, between the hours of 10:00 A.M. and 5:00 P.M. of that date to be read as evidence on behalf of the plaintiff in a certain suit in equity pending in the Circuit Court of Nansemond County, Virginia, wherein Willie McDaniel is the complainant and Ida Bell Sesoms McDaniel is the defendant.

Given under my hand this 11th day of December, 1923.

My commission expires on the 14th day of January, 1926.

C. L. Lewis

Notary Public in and for the City of Suffolk, State of Virginia.

WILLIE MCDANIEL....COMPLAINANT

VS) DEPOSITIONS

OLLIE BELL SESOMS MCDANIEL

DEFENDANT?

Pld Dec. 11, 1923

G. E. Whitley
Clerk

HUGH L. HOLLAND
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

Willie McDaniel . . . . . Complainant

vs) Decree

Ida Bell Sesoms McDaniel . . . . . Defendant

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

Om consideration whereof it appearing to the Court from the evidence taken and submitted in this cause that the said defendant, Ida Bell Sesoms McDaniel, since her marriage with the plaintiff has without cause deserted him for a period of more than three years, that the plaintiff is a resident of the County of Nansemond, and has been domiciled in the State of Virginia, for more than twelve months next preceding the commencement of this suit, and that the defendant now resides in the County of Nansemond, State of Virginia, the Court doth adjudge, order and decree that the said plaintiff be, and he is hereby granted a divorce a vinculo matrimonii, from the said defendant, and that the marriage heretofore solemnized be, and the same is hereby annulled and set aside, and it appearing that nothing further remains to be done in this cause, it is ordered to be stricken from the docket.

But neither party shall marry by virtue of this decree until the expiration of six months from the date of the entering of same.

Willie McDaniel....Complainant

vs) Decree

Ida Bell Sesoms McDaniel

Defendant.

Entered Jany 5. 1925

Jas L. McLemore,

#5 - Pg. 509

HUGH L. HOLLAND
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

WILLIE MCDANIEL.....COMPLAINANT

VS) BILL OF COMPLAINT

IDA BELL SESOMS MCDANIEL..DEFENDANT

TO THE HONORABLE CIRCUIT COURT OF NANSEMOND COUNTY:

Your complainant, Willie Mc Daniel, respectfully, represants:

(1) That on the 14th day of November 1921, your complainant, Willie McDaniel, was lawfully in the City of Suffolk, Virginia, to Ida Bell Sesoms McDaniel, whose maiden name was Ida Bell Sesoms, as will appear from a certificate of marriage herewith filed, marked "Exhibit A," and made a part of this bill; and,

(2) That your complainant and the said defendant never lived together after the aforesaid marriage on November 14, 1921; and,

(3) That the said Ida Bell Sesoms McDaniel did wilfully deserted and abando-ned your complainant on the 14th day of November 1921; that is to say, on the 14th day of November 1921 at the time of the aforesaid marriage, the said Willie McDaniel, did prepare a home for the said defendant and invited her to live with him as his wife at his place of abode in Nansemond County, Virginia, which the said defendant voluntarily, wilfully and without any justification whatever refuse to do; that immediately after the marriage the said defendant refused to live with your said complainant, wilfully deserted and abandoned him and never did consummate said marriage; that at

the time of said marriage your complainant was confined in the County Jail, threatened with prosecution for seduction, of which he was not guilty. Being unable to employ counsel and not knowing his rights in the premises the said marriage was forced on your said complainant by the parents of the said defendant against the will and wishes of both your complainant and the said defendant; that your complainant and the said defendant have never lived together since said marriage; that your complainant has seen the said defendant several times since the said marriage and tried to induce her to live with him, which she has constantly and continuously refused to do and still refuses to do; and,

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

(5) That the said defendant now resides in the County of Nansemond, in the State of Virginia;

In consideration whereof and forasmuch as your complainant is remediless in the premises save in a court of equity, your complainant prays that the said Ida Bell Sesoms may be made a party defendent to this bill, and required, but not oath, to answer the same, the oath being hereby waived; that proper process may be issued, that a divorce of mensa et thoro be decreed your complainant now; that a divorce from the bond of matrimohy be decreed your complainant at the expiration of three years from November 14, 1921; and that your complainant may have all such further, and other, and general relief in the premises as the nature of his case may require, or to equity shall seem meet.

Willie McDaniel
Complainant
by Counsel

Hugh L. Holland
Counsel.

WILLIE MCDANIEL

COMPLAINANT

VS) BILL OF COMPLAINT

IDA BELL SESMONS MCDANIEL

DEFENDANT

Filed Dec. 3 1953

W. B. Duntley Clerk

HUGH L. HOLLAND
ATTORNEY AT LAW
SUFFOLK, VIRGINIA

Hugh R. Holland, Jr.

Willie McKenzie

&

Ida Bree Stevens McKenzie

Final Decree

Jan. 5, 1925

11-21-23 Abstract $10.00