

1925-018
Nansemond Co (Suffolk) Chancery Causes: M. E. Moore vs Lila B. Moore

Waters, Jones

J. R. SAUNDERS

JOHN K. HUTTON

SAUNDERS & HUTTON
Attorneys at Law
Suffolk, Va.

August 29th, 1924.

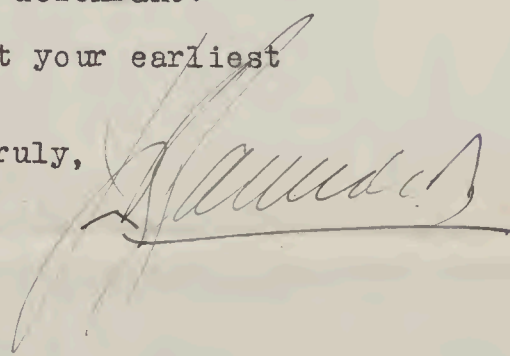
Mr. George E. Buntin, Clerk,
Suffolk, Virginia.

Dear Sir:

I enclose you herewith memorandum, bill and notice to take depositions together with check for deposit fee in the case of M. E. Moore against Lila B. Moore who resides at #1559-45th Street, Lamberts Point, Norfolk, Virginia. I would thank you to send this notice to take depositions and process to Norfolk to be served on this defendant.

Thanking you to get this done at your earliest convenience, I am,

Yours very truly,

A handwritten signature in dark ink, appearing to read "J. R. Saunders", is written over a horizontal line. The signature is fluid and cursive.

JRS/P.
Enc.

TO THE CLERK OF THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA:

M. E. Moore.....Complainant

Vs. IN CHANCERY MEMORANDUM

~~Willa~~ B. Moore.....Defendant.

Please issue process returnable to the Second Rules,
Third Monday in September, 1924.

Deposit \$7.50

[Signature] P.Q.

Rule Notes:

Sept. 2, 1924-Process issued ,returnable to Sept. Rules, Third Monday, 1924

M. E. Moore,
Complainant,

Vs.

Lilla B. Moore,
Defendant.

MEMORANDUM.

CHANCERY SUMMONS

The Commonwealth of Virginia.

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

You are Hereby Commanded to Summon Lila B. Moore -----

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 September, 1924, to answer a

Bill in Chancery, exhibited against her

in the said Court by M.E. Moore,

And have then and there this summons.

Witness. G. E. Bunting, Clerk of our said Court, at his office, this 2nd day of
September, 1924, in the 138th year of the Commonwealth.

~~A Copy~~ Teste:

Clerk }

Teste:

Clerk

PAID
ORIGINAL

Saunders & Hutton, ----- p. q.

M.E. Moore

vs. } In Chancery

Lila B. Moore

19 24

September ----- Rules

Third ----- Monday.

NANSEMOND COUNTY COURT,

Process Book, No. 3

Page -----

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

City of Norfolk

Wm. D. Armistead
SHERIFF
John W. D. Armistead
SHERIFF

Executed this 3^d day of September, 1924 by delivering a true copy of the with-
in process to *Lila B. Moore*

STATE OF NORTH CAROLINA, }

Office Register of Deeds,

Hertford COUNTY.

Aug 22 1924

To any Ordained Minister of any Religious Denomination, or any Justice of the Peace of said County:

M. E. Moore having applied to me for a LICENSE for the marriage
of *M. E. Moore* of *Hertford Co.*
age *22* years, color, *Col.*, the son of *Arthur Moore*
and *Angelin Moore* the father now *Living* the mother *Living*
Living resident of *Hertford Co.* and *Lila B. Waters*
of *Hertford Co.* age *19* years, color *Col.*
daughter of *Frank Waters* and *Ella Waters*
the father *Living* the mother, *Living* resident of *Hertford Co. N.C.*

* and the written consent of _____ the _____
of the said _____ to the proposed marriage having been filed with me.

And there being no legal impediment to such marriage known to me, you are hereby authorized, at any time within one year from the date hereof, to celebrate the proposed marriage at any place within said County.

You are required, within two months after you shall have celebrated such marriage, to return this license to me at my office with your signature subscribed to the certificate under this license, and with the blanks therein filled according to the facts, under penalty of forfeiting two hundred dollars to the use of any person who shall sue for the same.

J. Adonick
REGISTER OF DEEDS,

1. Name of person applying for license
2. Name of man to be married, in full.
3. Residence.
4. Age.
5. White or Colored.
6. Father of man to be married.

7. Mother of man to be married.
8. Living or dead.
9. Living or dead.
10. Residence if known, if not, state unknown.
11. Name of woman to be married, in full.

12. Residence
13. Age.
14. White or Colored.
15. Father's name.
16. Mother's name.
17. Living or dead.

18. Living or dead
19. Residence if known, if not, state unknown.
*If both parties are over 18 years of age s'r.ke out.

Macedonia Waters being duly sworn, says: That the parties applying for license are of lawful age, and that, so far as he is informed and believe, there is no lawful causes or impediment forbidding said marriage.

Macedonia Waters
Mark

WITNESS: *J. Adonick*

STATE OF NORTH CAROLINA, }

Hertford COUNTY.

I, *W. O. Watson* a *Baptist Minister*
united in matrimony *M. E. Moore*
and *Lila B. Waters* the parties licensed above, on the *24th*
day of *August* 192*4*, at *Frank Waters' House*
in *Harrellsville Township*, in said county, according to law.

WITNESSES PRESENT AT MARRIAGE:

Wright Valentine of *Cofield N.C.*
J. E. White of *Harrellsville N.C.*
James Harrell of *Harrellsville N.C.*

1. Name of person officiating. 2. If Minister, of what denomination. If Justice of the peace, so state. 3. Name of man married.
4. Name of woman married. 5. Place of marriage. 6. Township. *At least three persons present at marriage must sign as witnesses.

Exhibit "A"

North Carolina }
Hertford County.

L. J. A. Norichcott, Reg. Deeds for County
and State, aforesaid, do hereby certify that
the foregoing and within exhibiting is a
true and accurate copy of the marriage
records of my office.

Witness My hand and official seal

this the 6th day of June 1924

~~L. J. A. Norichcott~~
Reg. Deeds Hertford Co. No.

No.

M. E. Moore

and

Lila B. Waters

Marriage License.

192



Returned on the

day of 192

and registered in Marriage Register,

on page, this

192

Register of Deeds.

Return to Register of Deeds.

NOTE. Minister or Justice is required to fill the blanks
in the certificate and return the License within two
months after marriage.

VIRGINIA:

CIRCUIT COURT OF THE COUNTY OF HANSEMOND.

M. E. Moore Complainant,

vs. In Chancery - On Bill for Divorce - Depositions.

Lila B. Moore Defendant.

Depositions of Angelina Moore, Lola Jones, Beatrice Moore and M.E. Moore, taken before me, John H. Palmer, Commissioner in Chancery for the Circuit Court of the County of Hansemond, Virginia, on the 28th day of February, A.D. 1925, in pursuance of the annexed notice, at the office of Saunders and Hutton, 105 West Washington Street, Suffolk, Virginia, between the hours of nine o'clock in the forenoon, and three o'clock ^{the same having been regularly continued from September 30, 1924, and thereunto by regular adjournments,} in the afternoon of that day, [^] to be read in evidence in a suit in which M. E. Moore is complainant, and Lila B. Moore is defendant, pending in the Circuit Court of the County of Hansemond, Virginia.

Appearances:

For Complainant, Job R. Saunders, esquire.

For Defendant, None.

TO ^{Wila}~~Willa~~ B. MOORE:

Take Notice, that on the 30th day of September, 1924, at the office of Saunders and Hutton, Pinner Building, in the City of Suffolk, Virginia, between the hours of ten A. M. and five P. M. , of that day, I shall proceed to take the depositions of Angiline Moore and others, to be read as evidence in my behalf in a certain suit in chancery, depending in the Circuit Court of the County of Nansemond, wherein I am the complainant and you are the 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 time to time, at the same place, and between the same hours until the same be completed.

Given under my hand this the 29th day of August, 1924.

W. E. Moore
complainant.
By J. H. Saunders
His Attorney.

M. E. Moore,
Complainant.

Vs.

Lilla B. Moore,
Defendant.

NOTICE TO TAKE DEPOSITIONS.

ORIGINAL.

Executed in the City of Norfolk,
Va., this the 3 day of Sept 1924
by serving a Copy hereof on

Lilla B. Moore

IN PERSON.

C. H. TUMBLESON,

Sergt. City of Norfolk, Va.

By

W. Carmine
Deputy

EXAMINED BY MR. SAUNDERS.

Q. Angiline Moore, a witness for the complainant, being duly sworn, deposes and says:

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

A. Name, Angiline Moore; age, 56; Residence, Nansemond County, Virginia; occupation, housewife.

Q. Do you know M. E. Moore and his wife, Lila B. Moore?

A. Yes sir.

Q. M. E. Moore is your son. Is he not?

A. Yes; he is my son.

Q. Have you known his wife all the time during their married life?

A. Yes sir.

Q. How near did they live to you at the time they separated?

A. They lived with me.

Q. How long had they been living there?

A. They had been living there about 2 years.

Q. During that time did your son support her and take care of her like a man should take care of his wife?

A. Yes sir. He certainly did.

Q. Did he treat her kindly?

A. Very kindly.

Q. During this time, did he do anything to her or did you observe anything in his conduct that caused her to leave him?

A. Not anything at all. I never seen anything. He treated her all right.

Q. Did she leave him or did he leave her?

A. She left him.

Q. Did you have any talk with her prior to her leaving or about the time she left as to whether or not she intended to live with him again?

A. Yes sir. I asked her was she coming back, and she said, "Never no more".

Q. Do you know why she left him?

A. She left him because she had somebody else, and she had some letters there that were from another man and I saw them.

Q. Did you read the letters?

A. Yes sir.

Q. What kind of letters were they?

A. They were love letters, and read like love letters.

Q. Where was this man living who wrote these letters at the time she left your son?

A. In North Carolina.

Q. Do you know where she went when she left your son?

A. She went there,—North Carolina.

Q. About when was it that she left him?

A. She left him in November.

Q. What year?

A. It was 1920.

Q. Since November, 1920, have she and your son lived together?

A. They have not.

Q. Would you have known it if they had lived together?

A. Yes sir.

And further this deponent saith not.

Angelina Moore

Iola Jones, a witness for the complainant, being duly sworn deposes and says:

Q. Please state your name, age, residence and occupation?
A. Iola Jones; 24 years; Hansemond County, Virginia; Housewife.

Q. Do you know M. E. Moore and Lila B. Moore, and did you know them during the time they were living together as husband and wife?

A. Yes sir.

Q. Do you remember the time they separated and which one left the other?

A. Yes sir. She left him.

Q. How far were they living from you at the time she left him?

A. I lived next door to them.

Q. About how far were the houses apart?

A. About one hundred yards.

Q. Did you have any talk with her along about the time she left him as to whether or not she intended to live with him again?

A. Yes sir. She said she was never coming to live with him any more.

Q. Do you know why she left him?

A. Yes. She left him for another man.

Q. Do you know anything about the other man?

A. No more than saw the letter that she got from him.

Q. Was there anything said in the letters about arrangements to meet?

A. Yes sir.

Q. Was that at the time she left him?

A. Yes sir.

Q. Where were they to meet?

A. They were to meet here in Suffolk.

Q. Where was he living at the time?

A. North Carolina.

Q. Where was she going?

A. To North Carolina.

Q. How did you happen to see the letter?

A. It was showed to me.

Q. Do you know whether or not ^{Mr. Moore,} he took care of her and supported her and treated her kindly as a husband should treat his wife while they live together?

A. Yes sir. He did.

Q. Did you visit there often?

A. Yes sir. Every day.

Q. Did you know of anything or observe anything in his treatment toward her that caused her to leave?

A. No sir.

Q. About when was it she left him?

A. She left him in November, 1920.

Q. Since November, 1920, have they lived together?

A. No sir.

Q. Would you have known it if they had lived together?

A. Yes sir.

And further this deponent saith not.

Tola Jones

Beatrice Moore, a witness for the complainant, being duly sworn deposes and says.

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

A. Name, Beatrice Moore; age, 15; residence, Nansemond County; occupation, school girl.

Q. Were you living in the house with your brother, M. E. Moore, and his wife at the time they separated?

A. Yes sir.

Q. Do you know which one left the other?

A. Yes sir. She left him.

Q. Did you see any cause she had to leave him?

A. No.

Q. Do you know whether he treated her right and supported ^{her} while they lived together?

A. He certainly did.

Q. How long did you folks live together?

A. About two years.

Q. Did he continue to live there after she left?

A. Yes sir.

Q. Have you ever seen her since that time?

A. Once since.

Q. Where was she?

A. In Norfolk, Virginia.

Q. Has she ever been back?

A. No sir.

Q. Do you know whether or not your brother and she have lived together since that time?

A. They have not.

Q. Would you have known it if they had?

A. Yes sir.

Q. Did you see her the day she left?

A. Yes sir.

Q. Did you have any talk with her?

A. No sir.

By the Commissioner:

Q. Do you know when she left him? And further this deponent saith not.

A. Yes, sir.

Q. When was that?

A. November, 1920.

John H. Palmer, Com'r in Chancery

Beatrice Moore.

M. E. Moore, complainant, being duly sworn, deposes and says:

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

A. Name, M. E. Moore; age, 29; residence, Nansemond County; occupation, preacher.

Q. How long have you lived in Nansemond County?

A. I have lived here practically all my life since I was a little boy.

Q. Were you living in Nansemond County at the time you and your wife separated?

A. Yes sir.

Q. Did you give her any cause to leave you?

A. No sir.

Q. Did you and she have any row or fuss or anything before she left?

A. No; we did not. Not a thing.

Q. Did you know she was going to leave?

A. No more than what she said after I saw the letter.

Q. What kind of letter did you see?

A. A letter that came from a man in North Carolina, the one she is living with now.

Q. What did he say in that letter?

A. He asked her to meet him in Suffolk and he would go back with her to North Carolina.

Q. Did you see that letter?

A. Yes sir. I found it.

Q. Did she meet him in Suffolk?

A. I don't know whether she met him or not, but he asked her to meet him here.

Q. Do you know of anything that you had done to make her leave?

A. No sir. I asked her not to leave and I went with her to the station and begged her not to leave, but she said she was going anyway.

Q. Did she tell you whether or not she was coming back any more?

A. She said she was not coming back any more unless her mind changed, and it has not changed. She wrote me later that she was not coming back.

Q. Did I understand you to say that she was living with this man now?

A. Yes sir. She is living with him now.

Q. Do you know where she is living?

A. She is living in Norfolk, but I do not know the address. I gave it to you once but I don't remember it now.

Q. Did you properly provided for her as a husband should for his wife?

A. Yes sir.

Q. Did you treat her kindly?

A. Yes sir.

Q. Do you know of any reason at all that she has to leave, except to go to this other man?

A. No other.

Q. When did she leave you?

A. November 25th, 1920.

~~And further this deponent saith not.~~

BY THE COMMISSIONER.

Q. State whether you are married to the defendant?

A. Yes sir.

Q. When were you married to her?

A. August 23rd, 1914.

Q. Where were you married to her?

A. Harrellsville, North Carolina.

Q. Where did you reside after you were married?

A. We lived in Harrellsville until the following year when we moved to Nansemond County, Virginia.

Q. Have you lived there in Nansemond County since that time?

A. Yes. Until now.

And further this deponent saith not.

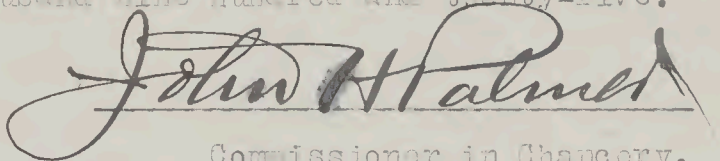
M. E. Moore

STATE OF VIRGINIA,

CITY OF SUFFOLK, to-wit:

I, John H. Palmer, a Commissioner in Chancery for the Circuit Court of the County of Hansemond, in the State of Virginia, do hereby certify that the foregoing depositions were duly taken and reduced to writing before me, and signed in my immediate presence, at the place and time in the caption mentioned, pursuant to the said annexed notice.

IN WITNESS WHEREOF, I have hereunto set my hand at Suffolk, Virginia, this twenty-eighth day of February, in the year of our Lord one thousand nine hundred and twenty-five.


Commissioner in Chancery.

Fees: \$ 10.00.

CIRCUIT COURT OF THE COUNTY
OF HALESTON.

W. S. Moore
Complainant
vs.

Ellis B. Moore
Defendant.

On bill for Divorce.

DEPOSITIONS.

Saunders and Hutton,
Attys.

Filed 3-3-25

H. B. Anthony,
Clerk

SAUNDERS & HUTTON
Attorneys at Law
Suffolk, Ala.

M. E. Moore.....Complainant.

Vs.

DECREE

Lila B. Moore.....Defendant.

This cause, in which process has been duly served upon the defendant, Lila B. Moore, came on this day to be heard on the complainant's bill and the exhibit filed therewith, the defendant failing to appear, plead, answer or demur to the complainant's bill of complaint, the depositions taken before John H. Palmer, Commissioner in Chancery, duly filed in this cause, and was argued by counsel.

Upon consideration of all of which, independently of the admissions of either party in the pleadings or otherwise, the court is of the opinion that the parties last cohabited in the County of Nansemond, Virginia, and that the defendant has, without cause, abandoned the complainant for a period of more than three years, and that the complainant is entitled to the relief prayed for in his said bill. It is, therefore, adjudged, ordered and decreed that the marriage heretofore had and solemnized between the defendant, Lila B. Moore, and the complainant, M. E. Moore, shall be, and the same is, hereby dissolved; and that the said M. E. Moore be forever divorced from the said Lila B. Moore.

And there remaining nothing further to be done in this ~~suit~~^{cause}, it is ordered that the same be stricken from the docket.

M. E. Moore,
Complainant,

Vs. DECREE

Lila B. Moore,
Defendant.

Enter the 20 day of
Octo, 1925.

Jas. L. McHenry

Entered in Chancery Order
Book #5, page 566.

M. E. Moore.....Complainant,
Vs. IN CHANCERY BILL
~~Lilla~~ Lila B. Moore.....Defendant.

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF NANSEMOND
COUNTY, VIRGINIA:

Your complainant, M. E. Moore, respectfully represents:

FIRST: That on the 23rd day of August, 1914, your complainant was lawfully married in the County of Hertford, North Carolina, to Lil/a B. Moore, whose maiden name was Lil/a B. Waters, as will appear from a certificate of marriage herewith filed marked Exhibit "A" and made a part of this bill.

SECOND: That shortly after the said marriage your said complainant and his said wife moved to Nansemond County, Virginia, where they resided continuously until the 25th day of November, 1921.

THIRD: That the said defendant has wilfully deserted and abandoned your said complainant for a period of more than three years next preceding the commencement of this suit; that is to say, that on the 25th day of November, 1921, in the County of Nansemond, Virginia, the said Lil/a B. Moore did wilfully, voluntarily and without any justification whatever leave her home and your said complainant; that immediately before leaving and at times subsequent thereto, the said defendant did declare her intention to leave your said complainant and never return to him and she has never returned.

FOURTH: That the said Lil/a B. Moore now lives at number 1559-45th Street, Lamberts Point, Norfolk, Virginia, with another man to whom she is not married, and since she deserted your said complainant has been the mother of one child, not the child of your said complainant, and your said complainant is informed that the said child is the child of the man with whom she is now living

at number 1559-45th Street, Lamberts Point, Norfolk, Virginia, as aforesaid.

FIFTH: That your said complainant 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 now domiciled and now resides in the County of Nansemond, Virginia, and that your said complainant last lived with the said Lilla B. Moore as husband and wife in the County of Nansemond, Virginia.

In consideration whereof and for as much as your complainant is remediless in the premises save in a court of equity, your complainant prays that the said Lilla B. Moore may be made a party defendant to this suit and required to answer the same, but not on oath, the oath being hereby waived; that a divorce from the bond of matrimony which was created by the aforesaid marriage be decreed to him and that your complainant may have all such further and other and general relief in the premises as the nature of his cause may require or to equity shall seem meet.

M. E. Moore
Complainant.
By J. J. [Signature]
His Attorney.

[Signature]
Counsel.

M. E. Moore,
Complainant.

Vs. IN CHANCERY BILL

Lilla E. Moore,
Defendant.

SAUNDERS & HUTTON
Attorneys at Law
Suffolk, Va.

Samuel & Hutton. 11-9

M. E. Moore

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Rich. B. Moore

Sept. 2, 1914. ~~Sept 30~~