

1930-011
Nansemond Co (Suffolk) Chancery Causes: Mary Norfleet Pleasant vs William Pleasant

Norfleet, Crute

VIRGINIA,

IN THE CIRCUIT COURT OF NANSEMOND COUNTY:

Mary Norfleet Pleasants.....Complainant

v.

William Pleasants... ..Defendant

To Paul J. Powell, Clerk:

Issue subpoena in chancery, requiring the defendant to
answer a bill of complaint the first Monday in June, 1930.

Holland & Woodward R. g.

Mary Norfleet Pleasant
vs.

William Pleasant

None

311

VIRGINIA: IN THE CIRCUIT COURT OF NANSEMOND COUNTY

Mary Pleasant

Vs.

William Pleasant

The Clerk of this Court will please issue process in the above styled cause directing the defendant, William Pleasant to answer the Bill of Complaint of the Complainant, returnable to the next rules of this Court.

W. W. Foreman p.q.

William Pleasant may be found on the Norfolk Road, Suffolk, Va.

VIRGINIA:
IN THE CIRCUIT COURT OF
NANSEMOND COUNTY.

Mary Pleasant

Vs.

William Pleasant

MEMORANDUM

Filed May 27-1930

W. W. Foreman, p. q.

The Commonwealth of Virginia,

To the Sheriff of the County of Nansemond, Greeting:

WE COMMAND YOU, That you summon William Pleasants

to appear at the Clerk's office of the Circuit Court of the Co. of Nansemond
at the rules to be held for the said Court on the 1st Monday in June, 19 30,
to answer a bill in chancery, exhibited against him in our said Court by
Norfleet
Mary/Pleasants

And have then there this writ. Witness Paul J. Powell, Clerk of our said
Court, at the court-house, the 27 day of May, 19 30, and in the
154th year of the Commonwealth.

Paul J. Powell, Clerk.

By Olivera Whitehurst, D.C.

No. 300

Mary Norfleet Pleasants

vs. }

SUBPOENA IN CHANCERY

William Pleasants

p. q.

To First June Rules,

Nanse. County Circuit Court.

sd p 25

Executed on the 28th of May
1920, with a true copy of the within-
in summons ~~notice~~, in writing, to William

Pleasants

E. B. Rawles

Sheriff of Nansemond County

By

J. C. Taylor

Deputy Sheriff of Nansemond County

The Commonwealth of Virginia,

To the Sheriff of the County of Nansemond, Greeting:

WE COMMAND YOU, That you summon William Pleasants

to appear at the Clerk's office of the Circuit Court of the County of Nansemond,
at the rules to be held for the said Court on the first Monday in June, 1930,
to answer a bill in chancery, exhibited against him in our said Court by
Mary Pleasants

And have then there this writ. Witness Paul J. Powell, Clerk of our said
Court, at the court-house, the 27th day of May, 1930, and in the
154th year of the Commonwealth.

Paul J. Powell, Clerk.
By Oliver Whitcomb, D. C.

Original
No. 300

Mary Pleasants

vs.

} SUBPOENA IN CHANCERY

William Pleasants

W.W.Foreman p. q.

To .. First. June .. Rules,

Nansemond County .. Circuit Court.

504 24

Executed on the 28 day of May
1930, within the County of Nansemond, State
of Virginia, by delivering a true copy of the with-
in summons notice, in writing, to William
Pleasants in person.

E. B. Rawles
Sheriff of Nansemond County

By J. C. Taylor
Deputy Sheriff of Nansemond County

Suffolk,

~~Suffolk~~, Va.

May 28, 1930.

To

William Pleasant

TAKE NOTICE, that on

June 17th

1930

at

3

o'clock

P

.M.,

at the office of

William M. Birdsong

Suffolk,

~~Suffolk~~,

Virginia, I shall proceed to take deposition of

Doris Pleasant

and others, before William M.

Commissioner in Chancery

Birdsong

~~Notary Public~~

to be read as evidence on behalf of the Plaintiff

in a certain suit pending and undetermined in the Circuit Court of

Nansemond Co., Va. wherein Mary Pleasant is

plaintiff and you are ~~is~~ defendant; and if from any cause

the taking of said deposition be not commenced, or, if commenced, be not con-

cluded, on that day, the taking thereof will be adjourned from time to time,

at the same place, until the same shall be completed.

Mary Pleasant

By

H. W. Foreman.

Counsel

NOTICE TO TAKE DEPOSITIONS

Mary Pleasant

)
vs.) In Chancery

William Pleasant

W. W. Foreman,

p.q.

To June 9th 1930

Sub Executed in the City of
~~Nor~~folk, Virginia, the

day of 19--by

serving a true copy of the

within notice on

in person.

Sub
Sergeant City of ~~Nor~~folk

Deputy Sergeant

Return to office of W. W. Foreman
Attorney and Counsellor at law
Attucks Theatre Building
Norfolk, Va.

Executed on the 28 day of May
1930, within the County of Nansomond, State
of Virginia, by delivering a true copy of the with-
in summons notice, in writing, to William
Pleasant in person.

Ed B. Curles
Sheriff of Nansomond County

By J. E. Sawyer
Deputy Sheriff of Nansomond County

Suffolk, Virginia,
September 30th, 1930.

To William Pleasant,
Norfolk Road,
Suffolk, Virginia.

TAKE NOTICE, that on the Seventh (7th) day of ~~October~~, 1930,
at ^{Two} ~~Three~~ (2:00) o'clock P. M., at the office of William M. Bird-
song, Commissioner in Chancery for the Circuit Court of Nansemond
County, Virginia, I shall proceed to take additional depositions
of Doris Pleasant and others, before the said Commissioner in
Chancery to be read as evidence on behalf of Mary Pleasant, plain-
tiff in a certain suit pending and undetermined in the aforesaid
Court wherein you are defendant and the said Mary Pleasant is ~~now~~
plaintiff; and if for any cause the taking of 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, until the same shall be completed.

TAKE FURTHER NOTICE, that on the 14th day of October,
1930, at 11:00 o'clock ~~A.~~ M., or as soon thereafter as
I may be heard, I shall appear before the Judge of the aforesaid
Court in his Chambers in the National Bank of Suffolk Building,
Suffolk, Virginia, for the purpose of asking the said Court to en-
ter a decree granting me an absolute divorce a vinculo matrimonii
from you and granting me a sum certain each and every week from
you as alimony and for the support of Doris Pleasant and her in-
fant child, Ruth Elizabeth Pleasant, and also her costs expended
in this suit, and also restraining and enjoining you from visiting
or otherwise molesting the said Mary Pleasant, Doris Pleasant and
Ruth Elizabeth Pleasant.

MARY PLEASANT

BY

H. T. Foreman, T
Counsel.

Porter 1
VIRGINIA:
IN THE CIRCUIT COURT OF
NANSEMOND COUNTY.

Mary Pleasant, Complainant

Vs.

William Pleasant, Defendant

Executed on the 2nd day of October
1930, within the County of Nansemond, State
of Virginia, by delivering a true copy of the with-
in summons notice, in writing, to William
Pleasant in person.

E. B. Rawles
Sheriff of Nansemond County

By J. C. Taylor
Deputy Sheriff of Nansemond County

NOTICE TO TAKE DEPOSITIONS,
ETC.

sof pel & B.R.

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

Mary Pleasants.....Complainant

v.

DEPOSITION

William Pleasants.....Defendant.

The deposition of Doris Pleasants taken before me, William M. Birdsong, a Commissioner in Chancery for the Circuit Court of Nansemond County, in the State of Virginia, pursuant to notice duly served on the defendant, at the office of William M. Birdsong, in the National Bank of Suffolk Building, Suffolk, Virginia, on the 7th day of October, 1930, between the hours of 10:00 A. M. and 5:00 P. M., to be read as evidence on behalf of Mary Pleasants in a certain suit depending in the Circuit Court of the County of Nansemond, in the State of Virginia, wherein Mary Pleasants is complainant and William Pleasants is defendant.

Present: W. W. Foreman, Attorney for Complainant.

Doris Pleasants, recalled.

Questions by W. W. Foreman.

Q. You testified at a previous hearing that William Pleasants had been guilty of several acts of adultery with you, but you failed to say what time. Will you please state the time these acts occurred?

A. In April, May and June of the year 1929, and several other times.

And further this deponent saith not.

Doris Pleasant

STATE OF VIRGINIA,

COUNTY OF NANSEMOND, To-wit:

I, William M. Birdsong, Commissioner in Chancery for the Circuit Court of Nansemond County, Virginia, do hereby certify that the foregoing deposition was duly taken, reduced to writing and signed by the witness before me at the place and time therein mentioned, pursuant to the annexed notice.

In witness whereof I have hereunto set my hand at Suffolk, in the County of Nansemond, Virginia, the state aforesaid, this 7th day of October, 1930.

William M. Birdsong
Commissioner in Chancery.

Oct. 31. 1930 filed
J.L.M.

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,

William Pleasant and Mary Norfleet

Given under my hand, as Clerk of the County Court of Nansemond County (or City) this 30th day of June, 1903.

A. P. Gomer, D. C., 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 County Court for the County (or City) of Nansemond

Date of Marriage 1903, June 30th Place of Marriage Suffolk, Va.

FULL NAMES OF PARTIES

William Pleasant and Mary Norfleet

Age of Husband 32 years; Condition (single, widowed or divorced) Widowed

Age of Wife 28 years; Condition (single, widowed or divorced) Single

Race (White or Colored) Colored

(PRESENT)

Husband's Place of Birth Guilford Co. N.C. Mailing Address Suffolk, Va.

Wife's Place of Birth Ridgway, N. C. Mailing Address Suffolk, Va.

Names of Husband Sias Pleasant and Martha, his wife

Parents { Wife Richard Norfleet and Celey, his wife

Occupation of Husband Laborer

Given under my hand this 30th day of June, 1903.

A. P. Gomer D. C., Clerk.

Certificate of Time and Place of Marriage

I, am an ordained minister of the Baptist

Church, or religious order of that name, do certify that on the 30th day of June, 1903,

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 questioned and gave bond according to law authorizing

me to celebrate the rites of marriage in the County (or City) of State of Virginia

Given under my hand this 30th day of June, 1903.

A true copy.

Teste: Paul J. Powell, Clerk
By Oliver Whitehead, Jr.

W. W. Grimes

(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).

Exhibit A

County ~~(or City)~~ Nansemond

William Pleasants

Husband

and {

Marriage License

Mary Norfleet

Wife

Date of Issue June 30th., 1903.

Marriage Register No. 2 Page 44

(No Stamp)

(Seal of Court
here superim-
posed on an
adhesive wafer)

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,

William Pleasant and Mary Norfleet

Given under my hand, as Clerk of the Circuit Court of Nansemond County
(on this) this 30th day of June, 1903, A. P. Gomer, D. C., Clerk

Marriage Certificate

To be annexed to License required by Section 5074 of the Code of Virginia.

VIRGINIA: In the Clerk's Office of the County Court for the County (or City) of Nansemond.
Date of Marriage 1903, June 30th Place of Marriage Suffolk, Va.

(FULL NAME OF PARTIES)

William Pleasant and Mary Norfleet

Age of Husband 32 years; Condition (single, widowed or divorced) Widowed

Age of Wife 28 years; Condition (single, widowed or divorced) Single

Race (White or Colored) Colored

(PRESENT)

Husband's Place of Birth Guilford Co., N.C. Mailing Address Suffolk, Va.

Wife's Place of Birth Ridgway, N.C. Mailing Address Suffolk, Va.

Names of Husband Sias Pleasant and Martha, his wife

(Full maiden name)

Parents Wife Richard Norfleet and Celey, his wife

(Full maiden name)

Occupation of Husband Laborer

Given under my hand this 30th day of June, 1903

A. P. Gomer D. C., Clerk

Certificate of Time and Place of Marriage

I, am an ordained minister of the Baptist Church, or religious order of that name, do certify that on the 30th day of June, 1903, at Suffolk, Virginia, under authority of the above License, I join 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 rights of marriage in the County (or City) of xxxxxxxxxxxx, State of Virginia.

Given under my hand this 30th day of June, 1903

A true copy. Teste: *James J. Pinner, Clerk*

W. W. Grimes

(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, 1919).

County (~~or City~~) Nansemond.....

William Pleasants.....
Husband

and { Marriage License

Mary Pleasants.....
Wife

Date of Issue June 30th, 1903.

Marriage Register No. 2...Page 44

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

Mary Pleasants.....Complainant

v.

DEPOSITIONS

William Pleasants.....Defendants

The depositions of Mary Pleasants and others, taken before me, William M. Birdsong, a Commissioner in Chancery for the Circuit Court of Nansemond County, in the State of Virginia, pursuant to notice duly served on the defendant, at the office of William M. Birdsong, in the National Bank of Suffolk Building, Suffolk, Virginia, on the 17th day of June, 1930, at 3:00 P. M., to be read as evidence on behalf of Mary Pleasants, in a certain suit depending in the Circuit Court of the County of Nansemond, in the State of Virginia, wherein Mary Pleasants is complainant and William Pleasants is defendant.

Present: W. W. Foreman, Attorney for Complainant.

June 17th, 1930. On motion of plaintiff, there being no appearance on behalf of defendant, this cause is continued until the 2nd day of July, 1930.

July 2nd, 1930: Present, W. W. Foreman, Attorney
for plaintiff.

Lourena Crute, being duly sworn, deposes as follows:

Questions by W. W. Foreman.

1. Q. State your name, age, residence and occupation.

A. Lourena Crute; 51; just home work; Third
Street, West Jericho, Nansemond County near
Suffolk.

2. Q. Do you know Mary Pleasant and William Pleasant, the complainant and defendant in this suit?

A. Know them both.

3. Q. How long have you known them?

A. Been knowing him 26 years and knowing her practically all my life.

4. Q. What relation are they to each other?

A. Man and wife.

5. Q. Where does Mary Pleasant live?

A. Sixth Street, Lloyd Place, Nansemond County.

6. Q. Are Mary Pleasant and William Pleasant living together now as man and wife?

A. They are not.

7. Q. Do you know why they are not living together now as man and wife?

A. On account of adultery.

8. Q. On whose part was it?

A. His part.

9. Q. When did they separate?

A. Last October.

10. Q. Have they lived together as husband and wife since they separated last October?

A. No.

11. Q. What opportunity have you had to observe them in their home life?

A. I was there most any and all times. She and I have been specially good friends.

12. Q. Do you visit her?

A. Often, see her twice a week.

13. Q. What was his attitude towards her in the home at the time you visited her?

A. Not very good, very unkind.

14. Q. From your observation did he appear to be a good provider in the home?

A. Not a good provider at all, very poor.

15. Q. You stated that they separated on account of adultery committed on his part. What proof have you of this adultery?

A. Just the child herself is all the evidence we have.

16. Q. What child?

A. Doris Pleasant.

17. Q. Does Doris Pleasant have any evidence to which she can point as a proof that he has been guilty of this act?

A. A child has been born to Doris.

18. Q. What relation, if any, is Doris Pleasant to William and Mary Pleasant?

A. Foster daughter.

19. Q. Where does Doris Pleasant live?
A. In the home of Mary and William Pleasant on Sixth Street, in Lloyd Place.
20. Q. Was she living there at the time these alleged acts took place?
A. Sure.
21. Q. Was she living there at the time the child was born?
A. Yes, sir.
22. Q. Is she still living there?
A. Yes.
23. Q. About how old is Doris Pleasant?
A. 17.
24. Q. Do you know how long she has been in the home with them?
A. Around thirteen years, as far as I know.
25. Q. What was Mary Pleasant's maiden name before she was married?
A. Mary Norfleet.
26. Q. Where were she and William Pleasant married?
A. On Forest Street in her mother's home. It was in the County then but it is Suffolk now.

27. Q. And you say that William Pleasant and Mary Pleasant have not lived together since this child was born to Doris?

A. No.

And further this deponent saith not.

Laura Lesate

* * * * *

Mary Pleasant, being duly sworn, deposes as follows:

1. Q. State your name, age, residence and occupation.

A. Mary Pleasant; 45; Sixth Street, Lloyd Place; washing.

2. Q. Are you the same Mary Pleasant who is named as complainant in this suit now depending in the Circuit Court of Nansemond County against William Pleasant?

A. I am.

3. Q. What relation is William Pleasant to you?

A. He is my husband.

4. Q. When and where were you married?

A. Nansemond County, Virginia, June 30th, 1903.

5. Q. Are ~~and~~ you and William Pleasant living together now as husband and wife?

A. No, sir.

6. Q. How long since you have lived together as husband and wife?

A. About six months.

7. Q. Why are you not living together now?

A. Some trouble betwixt I and my daughter. The daughter separated us.

8. Q. What daughter do you have reference to?

A. Ruth Pleasant, a baby four months old.

9. Q. Whose baby is that?

A. William's and Doris Pleasant's.

10. Q. Who is Doris Pleasant?

A. My adopted daughter.

11. Q. What is the age of Doris Pleasant?

A. 17 years old.

12. Q. About how old was she when you adopted her?

A. Three years.

13. Q. Is she living in your home and has she been living there continuously from that time?

A. Yes, she is still living there.

14. Q. Who is providing for the upkeep of this child since it was born?

A. I and Doris.

15. Q. Has William Contributed anything to its support?

A. No, sir.

16. Q. Does he contribute anything to your support?

A. No, sir, he has not brought anything there but a load of wood.

17. Q. What was your name before you married William Pleasant?

A. Mary Norfleet.

18. Q. Have you and William Pleasant lived together as husband and wife since you learned about this trouble you referred to between you and Doris?

A. No, sir.

19. Q. You asked in your bill that you be granted permission to resume your maiden name. Do you still desire that?

A. Yes, sir.

20. Q. Has William Pleasant visited your home since you and he separated?

A. Yes, sir, he comes there sometimes. Sometimes he comes there and the gate is locked and he jumps over it and comes in.

21. Q. What is his attitude towards you when he comes there?

A. Well, he was mad, seemed to be, put out a good deal of threats, said he was going to run anybody away if anybody he did not want there came there and if there was anybody there he did not want there he was going to shoot them. He talked like he would kill me or shoot me and I was scared of him.

22. Q. Are you afraid of him now?

A. I sure is.

23. Q. Then you are afraid if he is allowed to come in your home he would do you some injury?

A. Yes, sir, I am.

24. Q. Do you desire him to visit your home?

A. No, sir, I do not.

25. Q. Have you requested him to stay away from there?

A. Yes, sir, I has.

26. Q. When he comes there he is a trespasser? He comes in without your wishes?

A. He sure do.

27. Q. Where have you lived ever since you were married?

A. In the State of Virginia, Nansemond County.

28. Q. Where does William Pleasant live now?

A. In Suffolk on the Norfolk Road.

29. Q. Where did you and he last cohabit as husband and wife?

A. At home where I live now.

30. Q. How long since William Pleasant contributed to your support?

A. I don't know but about six months I reckon. Not since he left.

31. Q. Do you have sufficient money to prosecute this suit?

A. No, sir.

32. Q. Is your income sufficient to provide for the maintenance of Doris and her baby?

A. No, and I think William Pleasant ought to provide for us, me, her and that baby.

33. Q. When did you find out about this adultery?

A. When I had Doris examined by the doctor last October. She would not tell me anything at all before that but when the doctor said she was pregnant she broke down and told me the whole thing.

34. Q. Have you lived with him as man and wife since you found this out?

A. No, sir, I have not, not since he got his things and got out.

~~35x~~ And further this deponent saith not.

Mary Pleasant

* * * * *

Doris Pleasant, being duly sworn, deposes as follows:

1. Q. Give your name, age, residence and occupation.

A. Doris Pleasant; 17; Sixth Street; laundress.

2. Q. Do you know Mary Pleasant and William Pleasant, the complainant and defendant in this suit?

A. Yes, sir.

3. Q. How long have you known them?

A. About 14 years.

4. Q. What relation are they to each other?

A. Husband and wife.

5. Q. What relation are they to you?

A. I am their adopted daughter.

6. Q. Mary Pleasant has alleged in her bill that her husband, William Pleasant, is guilty of having committed adultery with you. Is that true?

A. Yes, sir, it is true.

7. Q. Did the acts upon which this allegation is based happen more than one time?

A. Yes, sir, it happened several times.

8. Q. Where did it take place?

A. At home.

9. Q. Who else was in the house except him when this happened?

A. No one.

10. Q. What was the result of this illicit relation between you and William Pleasant?

A. A child was born to me.

11. Q. How did you know it was William Pleasant's child?

A. Because I did not have anything to do with anybody but him.

12. Q. What is this child's name?

A. Ruth Elizabeth Pleasant.

13. Q. How old is this child?

A. Four months old.

14. Q. Has William Pleasant contributed anything to the support of this child since it was born?

A. No, sir.

15. Q. State whether or not he and his wife have lived together since this trouble between you and him.

A. No, sir.

16. Q. Do you know when they separated?

A. October of last year.

17. Q. Who has provided for you and this child since its birth?

A. My mother, Mary Pleasant.

18. Q. Where was your mother, Mary Pleasant, at the time this illicit act took place?

A. She was gone to Lodge Meeting and to Church.

19. Q. Did it happen in the day time or at night?

A. Daytime.

20. Q. When did these alleged acts start to occur?

A. Year before last.

21. Q. And continued up to what time?

A. October of last year.

And further this deponent saith not.

Davis Pleasant

STATE OF VIRGINIA,

COUNTY OF NANSEMOND, To-wit:

I, William M. Birdsong, Commissioner in Chancery for the Circuit Court of Nansemond County, Virginia, do hereby certify that the foregoing depositions 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 Suffolk, in the County of Nansemond, Virginia, the state aforesaid, this 8th day of July, 1930.

William M. Birdsong
Commissioner in Chancery.

VIRGINIA: IN THE CIRCUIT
COURT OF NANSEMOND COUNTY.

MARY PLEASANT

V.

WILLIAM PLEASANT

DEPOSITIONS

1930 Octo. 31. filed.
Hm

WILLIAM M. BIRDSONG
ATTORNEY AT LAW
SUFFOLK, - VIRGINIA

VIRGINIA: IN THE CIRCUIT COURT OF NANSEMOND COUNTY

MARY PLEASANT,

COMPLAINANT.

VS.

IN CHANCERY

WILLIAM PLEASANT,

DEFENDANT.

This cause came on this day to be heard on the Complainant's Bill and the exhibits filed therewith and the depositions of witnesses taken before a Commissioner in Chancery on behalf of the complainant, the respondent having failed to plead, answer or demur, and was argued by counsel.

UPON CONSIDERATION WHEREOF, and it appearing to the Court independently of the admissions of either party, in the pleadings or otherwise, that the said Mary Pleasant and William Pleasant were lawfully married on the 30th day of June, 1903; that within the last past five years, to-wit: during the months of April, May, June and July, in the year 1929, and at divers other times, the said William Pleasant did commit adultery by having illicit carnal knowledge of one Doris Pleasant; that the complainant, Mary Pleasant, has not cohabited with the said William Pleasant since obtaining knowledge of the said adultery; that the said complainant and respondent have resided and been domiciled in Nansemond County, Virginia, for a period of more than one year immediately next preceeding the commencement of this suit; that the said parties last co-habited in the said County of Nansemond, the Court doth adjudge, order and decree that the said Mary Pleasant be, and she is hereby, divorced A VINCULO MATRIMONII from the said William Pleasant, and the bond of matrimony created by the aforesaid marriage is hereby dissolved and annulled and the said Mary Pleasant is hereby permitted to resume her maiden name of Mary Norfleet. Nothing further to be done in this cause it is ordered that the same be removed from the docket, but leave is reserved to said parties, or either of them, to make application to this Court for such further orders as are authorized by law.

VIRGINIA:
IN THE CIRCUIT COURT OF NANSE-
MOND COUNTY.

Mary Pleasant

Vs. In Chancery.

William Pleasant

DECREE

Enter this 31st day of
October, 1930.

James L. McLean
Judge.

Chancery Order Book
No. 6 Page 361

VIRGINIA:

IN THE CIRCUIT COURT OF NANSEMOND COUNTY:

Mary Norfleet Pleasant.....Complainant

v.

BILL IN CHANCERY

William Pleasant.....Defendant

To the Honorable James L. McLemore, Judge:

Your complainant, Mary Norfleet Pleasant respectfully represents:

(1) That on the 30th day of June, 1903, your complainant, whose maiden name was Mary Norfleet, was married at Suffolk in the County of Nansemond, Virginia, to William Pleasant as will appear from a certificate of marriage herewith filed, marked "Exhibit A" and made a part of this bill; and,

(2) That continuously from the date of said marriage until the _____ day of October, 1929, your complainant and the said William Pleasant lived together as husband and wife in the said County of Nansemond, Virginia; and,

(3) That your complainant Mary Norfleet Pleasant and William Pleasant have no children of their own blood, but about sixteen years ago your complainant and the said William Pleasant adopted a baby, then about five months old, now known as Doris Pleasant, that the said Doris Pleasant has continuously lived with your complainant and William Pleasant until the time of their separation, that your complainant cared and provided for the said Doris Pleasant in a motherly way and caused the said Doris Pleasant to attend the public schools each school session from the time she was old enough to attend school until last year, that the said William Pleasant has absolutely failed and refused to support your complainant and the said Doris Pleasant for the last fifteen years or more; that the

said William Pleasant maliciously and willfully took advantage of the youthful age of the said Doris Pleasant, who, as aforesaid, was living in his home and who recognized the said William Pleasant as her father for a long period of time, by reason of the fact that the said William Pleasant committed adultery with the said Doris Pleasant; that is to say, that on the ____ day of May, 1929, and at various other times, while the said Doris Pleasant was living in the home of the said William Pleasant as his adopted daughter, the said William Pleasant did then and there have carnal illicit intercourse with the said Doris Pleasant, thus causing the said Doris Pleasant to give birth to a child on the following date, to-wit: the ____ day of January, 1930; and

(4) That on the ____ day of October, 1929, your complainant heard for the first time of the committing of the said adultery by her husband, William Pleasant; that she immediately ordered and demanded the said William Pleasant to leave her place of abode, and the said William Pleasant accordingly left your complainant; that she has not cohabited with the said William Pleasant since obtaining knowledge of the fact of the said adultery; and,

(5) That at the time of the institution of this suit, it had not been five years since the said adultery occurred, and that it was not committed by the procurement or carnivance of your complainant; and,

(6) That your complainant last cohabited with the said William Pleasant in the County of Nansemond, 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 William Pleasant 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 a divorce from the bond of matrimony which was created by the aforesaid marriage be decreed her; that the name of your complainant, Mary ^Norfleet Pleasant be changed to her

maiden name Mary Norfleet; and that your complainant may have all such further, and other, and general relief in the premises as the nature of her case may require, or to equity shall seem meet.

Mary Norfleet Pleasant
By counsel

HOLLAND & WOODWARD, p.q.

VIRGINIA,
IN THE CIRCUIT COURT OF NANSE-
MOND COUNTY:

Mary Norfleet Pleasant

v.

William Pleasant

BILL IN CHANCERY

Filed 6-5-36
[Signature]

HOLLAND & WOODWARD
ATTORNEYS AND COUNSELLORS AT LAW
SUITE 301-307 NATIONAL BANK OF SUFFOLK BUILDING
SUFFOLK, VIRGINIA

VIRGINIA: IN THE CIRCUIT COURT OF NANSEMOND COUNTY

Mary Pleasant

Vs.

William Pleasant

To the Honorable James L. Mc Lemore, judge of said Court:

Your complainant, Mary Pleasant, respectfully represents:

(1) That on the _____ day of June, 1903, your complainant, whose maiden name was Mary Norfleet, was lawfully married in the County of Nansemond, Virginia to William Pleasant as will appear from a certificate of marriage herein filed, marked exhibit "A" and made a part of this bill; and,

(2) That continuously from the date of said marriage until sometime during the month of October, 1930, your complainant and the said William Pleasant lived together as husband and wife in the said Nansemond County; and,

(3) That about 14 years ago there was taken into our home an infant about three years of age at the time and named Doris, whom we nutured and kept until the present time as our own child and gave the name of Doris Pleasant, which said child is now about the age of seventeen years; and,

(4) That the said William Pleasant has since the aforesaid marriage committed adultery; that is to say, some time during the months of April, May, June and July 1929 and at divers other times prior to said months, the said William Pleasant through prostitution and debasement of the child ^{by} affection of the said Doris Pleasant, gained of her by him, during the years that he sustained the said relationship of foster father to the said Doris Pleasant, entered a ^{certain} ~~said~~ house in the county aforesaid; that the said William Pleasant did then and there take the said Doris Pleasant into one of the rooms of the said house; and did then and there have carnal illicit intercourse with the said Doris Pleasant; and,

(5) That as a result of the frequent repetition of this carnal illicit intercourse visited upon the said Doris Pleasant by the said William Pleasant, a child was born to the said Doris Pleasant some time during the month of February, 1930; and,

(6) That some time during the month of October 1929, your complainant heard, for the first time, of the committing of adultery by her said husband; that she has not co-habited with him since obtaining knowledge of the fact of said adultery and that upon obtaining said knowledge she demanded that he immediately leave her home; and,

(7) That at the time of the institution of this suit it had not been five years since the said adultery occurred and that it was not committed by the procurement or connivance of your complainant; and,

(8) That your complainant and the said William Pleasant have resided and have been domiciled in this State ever since the aforesaid marriage and for more than one year next preceding the commencement of this suit; and are domiciled and now reside in this State; and,

(9) That your complainant last co-habited with the said William Pleasant in the said County of Nansemond, Virginia; and that your complainant is without sufficient means with which to support the said Doris Pleasant and her said offspring or with which to prosecute this suit; and that the said William Pleasant has not given her any money at all since some time during the month of January, 1923, or furnished her with necessaries of any description; that she is now living upon her own resources which are limited to what little she can earn as a laundry woman; and,

(10) That the said William Pleasant persists in making himself obnoxious to your complainant by frequent visits to her home against her wishes and without her consent at which time he is wont to threaten her with serious bodily harm;

IN TENDER CONSIDERATION WHEREOF and for as much as your complainant is without remedy in the premises save in a Courty of equity, where matters of this kind are cognizable, your complainant prays that the said William Pleasant may be made a party defendant to this bill, and required, but not under oath, to answer the same, the oath being hereby expressedly waived; that the said William Pleasant may be enjoined and restrained from interfering in any way with your complainant or her aforesaid daughter, Doris Pleasant, who is now with her; and that he be compelled to pay your complainant temporary alimony pending this suit; that a divorce from the bond of matrimony which was created by the aforesaid marriage be decreed her; that the said William Pleasant be required to furnish maintenance for the said Doris Pleasant and, *and until such time as said offspring is self sustaining* her off spring during the pendency of this suit; that it be decreed that the said Doris Pleasant shall remain with your complainant; That the Court may not require that any notice whatsoever be given to the said William Pleasant or any one else before the said injunction is awarded; that your complainant may be permitted to resume her maiden name, Mary Norfleet,; and that your complainant be granted all such further, and other and general relief in the premises as the nature of her case may require or to equity shall seem meet;

And she will ever pray, etc.

State of Virginia

City of Suffolk to-wit:

Mary Pleasant, the complainant in the foregoing bill, being duly sworn says that the facts and allegations therein contained are true, except so far as they are therein stated to be on information and that so far as they are therein stated to be on information she believes them to be true.

Taken, sworn to and subscribed before me, a Notary Public in and for the city and state aforesaid, in my city aforesaid this

20 day of May 1930

My time expires Dec 8-1932

Mary Pleasant
Complainant

J. H. Coe
Notary Public

VIRGINIA:
IN THE CIRCUIT COURT OF NANSE-
MOND COUNTY.

Mary Pleasant

Vs.

William Pleasant

BILL OF COMPLAINT

Filed May 27-1930
Paul J. Facella, Clerk
By Oliver Whitcomb, Jr.

W. W. FOREMAN
ATTY - AT - LAW
ATTUCKS BUILDING
NORFOLK, VIRGINIA