

1932-002
Nansemond Co (Suffolk) Chancery Causes: Willie King vs Laban Reid et al

Johnson, Moss, Finch, Culp, Butler

Adv. \$8.93

Virginia:

VIRGINIA: IN THE CLERK'S OFFICE
OF THE CIRCUIT COURT OF
NANSEMOND COUNTY, ON THE
16TH DAY OF SEPTEMBER, 1932.
Willie King Complainant
vs. ORDER OF PUBLICATION
Laban Reid, Cornelia Johnson, Rebecca
Moss, Lizzie Finch, Catherine Culp,
and the unknown heirs at law of
Polly Butler Defendants
The object of the above styled suit
is to have partitioned a certain tract
of land containing thirty (30) acres,
more or less, situated in Cypress Dis-
trict, Nansemond County, Virginia,
and bounded on the east by Shingle
Creek, on the south by State Highway
No. 12, just north of the Virginian
Railway property, and on the west and
north by the White property and oth-
ers, known as the Dempsey or Easter
Reid Estate, and it appearing by affi-
davit made and filed according to law
that Catherine Culp and Cornelia
Johnson are not residents of the State
of Virginia, and that the heirs at law
of Polly Butler are unknown, it is
therefore ordered that the said non-
residents and unknown parties do ap-
pear within ten days after due publi-
cation of this order in the Clerk's Of-
fice of the Circuit Court of Nanse-
mond County and do what is neces-
sary to protect their interests.

JOHN H. POWELL, Clerk.

A true copy—Teste:

JOHN H. POWELL, Clerk.

S. E. Everett, p. q.

se20,tu-4t

I, W. J. Gwaltney Secretary of the Virginian-Pilot
and the Norfolk Landmark, a newspaper published in the
City of Norfolk, State of Virginia, do certify that the
advertisement hereto annexed of

Suit Willie King vs Laban Reid, Cornelia
Johnson et als

has been published in said newspaper on the following
dates: September 20, 27, October 4 and 11
..... 19³²

Given under my hand this 26th day
of October 19³²

W. J. Gwaltney
.....
Secretary of Virginian-Pilot and Norfolk Landmark.

VIRGINIA:

In the Clerk's Office of the Circuit Court of the County of Nansemond.

Willie Long Pltff. }
vs. } In Chancery
James Reid et al Df't }

I hereby certify that on the 19th day of Sept. 1932

I posted a copy of the order of publication entered herein, at the front door of the Courthouse of the County of Nansemond; that being on or before the next succeeding rule day after said order was entered, and I further certify that I have mailed a copy of same to the last known address of the defendant.

Given under my hand this 19th day of Sept. 1932

James H. Powell, Clerk.

By _____, Deputy Clerk.

VIRGINIA: IN THE CLERK'S OFFICE OF THE CIRCUIT COURT OF NANSE-
MOND COUNTY, ON THE DAY OF SEPTEMBER, 1932

Willie King.....Complainant
vs. ORDER OF PUBLICATION

Laban Reid, Cornelia Johnson, Rebecca
Moss, Lizzie Finch, Catherine Culp, and
the unknown heirs at law of Polly Butler.....Defendants

The object of the above styled suit is to have parti-
tioned a certain tract of land containing thirty (30) acres,
more or less, situated in Cypress District, Nansemond County,
Virginia, and bounded on the East by Shingle Creek, on the South
by State Highway #12, just North of the Virginia Railway proper-
ty, and on the West and North by the White property and others,
known as the Dempsey or Easter Reid Estate, and it appearing by
affidavit made and filed according to law that Catherine Culp
and Cornelia Johnson are not residents of the State of Virginia,
and that the heirs at law of Polly Butler are unknown, it is
therefore ordered that the said non-residents and unknown parties
do appear within ten days after due publication of this order in
the Clerk's Office of the Circuit Court of Nansemond County and
do what is necessary to protect their interests.

S. E. Everett, p.q.

John H. Howell - Clerk

Willie King.....Complainant.

vs. ORDER OF PUBLICATION

Laban Reid, et als..Defendants.

Filed the 14th day of September,
1932.

John H. Powell-Clegg

Willie King.....Complainant

vs. AFFIDAVIT

Laban Reid, Cornelia Johnson, Rebecca
Moss, Lizzie Finch, Catherine Culp, and
the unknown heirs at law of Polly Butler.....Defendants

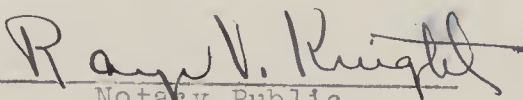
STATE OF VIRGINIA

City of Suffolk, to-wit:

This day, S. E. Everett personally appeared before me, Raye V. Knight, a Notary Public in and for the State and City aforesaid, in my City and made oath that Cornelia Johnson 247 West 149th Street, Apartement 1-B, New York City, New York, and Catherine Culp, 19 Astor Place, Jersey City, New Jersey, and the unknown heirs of Polly Butler, deceased, above named defendants are not residents of the State of Virginia, that there may be other parties interested whose names are unknown.

Given under my hand this 16th day of September, 1932

My commission expires the 21st day of April, 1934.


Notary Public

Willie King.....Complainant.

vs. AFFIDAVIT

Laban Reid, et als.
Defendants.

Filed the 16th day of September,
1932

John H. Powell-Clegg

TO THE HONORABLE CLERK OF THE CIRCUIT COURT OF NANSEMOND
COUNTY:

Willie King.....Complainant

vs. IN CHANCERY

Laban Reid, [✓]Cornelia Johnson, Rebecca
Moss, Lizzie Finch, Catherine Culp, and
the unknown heirs at law of Polly Butler.....Defendants

Issue summons to First Rules (^{Third}~~First~~ Monday) September,
1932.

H. H. Huntley, Jr.

Willie King.....Complainant

vs. IN CHANCERY

Laban Reid, Cornelia Johnson,
Rebecca Moss, Lizzie Finch,
Catherine Culp, and the unknown
heirs at law of Polly Butler....
Defendants

Filed the ~~13th~~ day of July, 1932.

John H. Small-Clegg

The Commonwealth of Virginia,

Sergeant of City of Suffolk:

To the ~~Sheriff of the County of~~....., Greeting:

WE COMMAND YOU, That you summon Laban Reid, Cornelia Johnson,

Rebecca Moss, Lizzie Finch, Catherine Culp, and the unknown heirs

at law of Polly Butler

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 third Monday in Sept., 1932,
to answer a bill in chancery, exhibited against them in our said Court by
Willie King

And have then there this writ. Witness John H. Powell, Clerk of our said
Court, at the court-house, the 16th day of Sept., 1932, and in the
157th year of the Commonwealth.

John H. Powell, Clerk
By Evelyn Harris D.C.

Executed within the City of Suffolk Virginia this 16 day of September 1922 by delivering a true copy of the within Summons in writing to Lizzie Fince in person and giving information of its purport to her.

Sgt. Fee

PAID

200

SERGEANT

H. W. Churn

City Sergeant.

M. H. Walton

Deputy City Sergeant.

Original

Form No. 300

Willie King

vs.

}

SUBPOENA IN CHANCERY

Laban Reid

p.q.

To the Sheriff

Rules,

Thurs

Circuit Court.

The Commonwealth of Virginia,

Sergeant of the City of Norfolk:

To the ~~Shery of the County of~~ _____, Greeting:

WE COMMAND YOU, That you summon ~~Laban Reid, Cornelia Johnson,~~
~~Rebecca Moss, Lizzie Finch, Catherine Culp, and the unknown heirs~~
at law of Polly Butler

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 ~~third~~ Monday in ~~September~~, 19 ~~32~~
to answer a bill in chancery, exhibited against ~~them~~ in our said Court by
~~Willie King~~

And have then there this writ. Witness ~~John H. Powell~~, Clerk of our said
Court, at the court-house, the ~~16th~~ day of ~~Sept.~~, 19 ~~32~~, and in the
~~157th~~ year of the Commonwealth.

John H. Powell - Clerk
By Evelyn Harris, D.C.

Not finding Laban Reid
at his/ her usual place of abode I executed the within in the City of Norfolk, Va., this 17 day of Sept, 1932, by delivering a copy hereof to her

2. he being then here, a MEMBER OF HIS ~~THE~~ FAMILY and over the age of 16 years, and giving information of its purport to her/ him.

CHAS. E. FRANCIS,
Sgt. City of Norfolk, Va.
By W. C. Lawrence Deputy.

Executed in the City of Norfolk, Va., this the 17 day of Sept, 1932, by serving a Copy hereof on

Laban Reid

IN PERSON.

CHAS. E. FRANCIS,
Sgt. City of Norfolk, Va.
By W. C. Lawrence Deputy.

Original
Sgt. Rec. 100 OK
PAID Form No. 300

Willie King

vs. }

SUBPOENA IN CHANCERY

Laban Reid et als.

....., p.q.

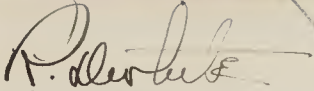
To Second Sept Rules,
Nansemon Circuit Court.

Rebecca Moore, ~~Winter Garden~~
1050 Baltimore St. ~~Washington~~
Washington ✓

John Reed
823 Queen St Norfolk ✓

Lizzie Finch
Columbus St
Suffolk ✓

RDW:MDB


District Inspector

Willie KingComplainant

vs. AFFIDAVIT

Laban Reid et als.....Defendants

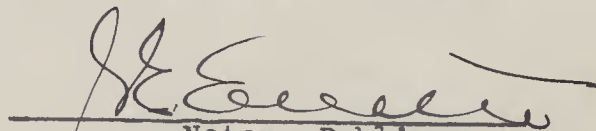
STATE OF VIRGINIA

City of Suffolk, to-wit:

 This is to certify that G. C. Bradshaw, W. A. Jake-
man, Jesse L. Williams, J. F. Culpepper, and D. L. Sumner,
Commissioners appointed in the above entitled suit by a decree
entered the 29th day of October, 1932, after going upon the
land of which Dempsey Reid died, seized and possessed, and
after reading said decree made oath in the City of Suffolk
before me the undersigned Notary Public that they would per-
form their duties faithfully in accordance with the decree
entered in this cause on the 29th day of October, 1932.

 Given under my hand this 24 day of November, 1932.

My commission expires the 24th day of July, 1933.


Notary Public

Willie King.....Complainant

vs. AFFIDAVIT

Laban Reid et als.....
Defendants

Filed the day of November,
 1932.

Willie King.....Complainant

vs. REPORT OF COMMISSIONERS

Laban Reid et als.....Defendants

To the Honorable James L. McLeomore, Judge of the Circuit Court
of Nansemond County, Virginia.

Your Commissioners, G. C. Bradshaw, W. A. Jakeman,
Jesse L. Williams, J. F. Culpepper and D. L. Sumner, appointed
by a decree entered October 29th, 1932, respectfully submits
the following report:

After taking the proper oath which is herewith filed
with this report your Commissioners went upon the land of which
Dempsey Reid died, seized and possessed, described as follows:

Commencing at the Northwestern intersection of State
Highway #58 with the Southern Railway Company, thence running
along the line of Willie King and Catherine Culp Northwardly
17°00' W. 190 feet to a ravine separating the Reid land from the
land known as the White land, thence along said ravine until the
same empties into another ravine, thence Eastwardly along last
named ravine through the culvert under said railroad and thence
along a small cove to Shingle Creek, thence up said Creek and
Southwardly to the said State Highway, thence Westwardly along
said highway to the point of beginning.

The said parties interested not desiring the same to
be sold but wishing the same to be equally divided among the
several parties entitled thereto according to its value, the
said Commissioners made the following division and described in
the reverse order as the plat shows.

To Cornelia Johnson Lot Number 5, containing 4.15 acres,
described as follows: Commencing on the North side of said high-
way 200 feet, more or less, from the Western boundary of the Atlantic
Coast Line Railway property, thence running North 19°00' E. 730 feet
to Shingle Creek, thence running Southwardly along Shingle Creek

to the said State highway, thence Westwardly along the North side of the said highway to the point of beginning. This gives Cornelia Johnson a small wedged shape tract of land between the Creek, highway and Atlantice Coast Line Railroad.

To Rebecca Moss Lot Number 4, containing 3.92 acres, described as follows: Commencing at a point on the West of the Cornelia Johnson lot on the North side of said highway and running 190 feet Westwardly on the North side of the said highway to the Laban Reid land, thence N. 15°00' E. 990 feet to the said Creek, thence South 270 feet to the line of Cornelia Johnson, thence S. 19°00' W. 730 feet to the point of beginning.

To Laban Reid Lot Number 3, containing 4.38 acres, described as follows: Commencing on the West at a point on the Rebecca Moss lot on the North side of the said highway, thence running Westwardly on the North side of said highway 210 feet to the land of Lizzie Finch, thence N. 11°10' E. 750 feet to the said branch on the North of said land, thence down said branch or cove East 410 feet to Shingle Creek, thence 85 feet Southwardly along said Creek to the land of Rebecca Moss, thence S. 15°00' W. 990 feet to the point of beginning.

To Lizzie Finch Lot Number 2, containing 4.02 acres, described as follows: Commencing at a point on the West side of the Laban Reid lot on the North side of said highway, thence running Westwardly along the North side of said highway 200 feet, thence along the Willie King and Catherine Culp land N. 4°40' W. 498 feet to the Southern Railway boundaries, thence along the East side of the Southern Railway boundaries Northwardly to the culvert on said railway boundaries, thence Eastwardly 335 feet down a

branch to the land of Laban Reid, thence S. 11°10' W. 750 feet to the point of beginning.

To Willie King and Catherine Culp Lot Number 1, containing 4.28 acres, but which is divided by said Southern Railway Company, and described as follows: Commencing at a point on the West of the Lizzie Finch lot on the North side of said highway, thence running Westwardly along the Northern side of said highway to the Southern Railway boundaries, thence along the Eastern side of said Southern Railway boundaries Northwardly 578 feet, thence S. 40°40' E. 498 feet to the point of beginning on said highway. Description of the lot of Willie King and Catherine Culp on the West side of said Southern Railway boundaries: Commencing at the West side of the Southern Railway boundaries and on the North side of the said highway and running along an old ditch N. 17°00' W. 190 feet to a ravine or branch, thence following the various courses of said branch Northeastwardly to said Railway boundaries, thence Southwestwardly 913 feet along West side of said Railway boundaries to the point of beginning. The cemetery located on this lot, Number One, is reserved for the benefit of the family and an eight foot driveway from said highway on the West side of the Southern Railway boundaries to the said cemetery for ingress and egress to said cemetery.

Your Commissioners have set a value of \$1000.00 on said property.

All parties were represented by attorneys and all appeared to be well satisfied with the partition that has been made.

All of said property is situated in Cypress Magisterial District, Nansemond County, Virginia.

It appears from the best information that your Commissioners can obtain that the deed to this property was burned in 1866 when the Nansemond County Clerk's Office was destroyed by fire but said property has been in possession of Dempsey Reid and his heirs for seventy years or more undisturbed.

The same thing is true as to the small tract West of the Reid land and on the North side of said highway of Willie King and Catherine Culp which has been in possession of Martha Reid King, their mother, and her heirs for seventy years or more.

Your Commissioners have had the land surveyed and a plat made of the same showing each heir's share and have attached said plat to said report and ask that it be made a part of this report.

All parties to this suit were present except Cornelia Johnson who was represented by counsel.

Respectfully submitted:

Y. B. Webb
J. Z. Williams
W. A. Jackson
J. F. Culp
D. L. Sumner

Willie King.....Complainant
vs. REPORT OF COMMISSIONERS
Laban Reid et als.....
Defendants

Filed the 17th day of November,
1932.
J. M.

I have seen this
rept. J. M.
H. E.

Deed Book 126; Page 267
{ other information see back
of final decree }

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA.

Willie King.....Complainant

vs. DECREE

Laban Reid, Cornelia Johnson, Rebecca
Moss, Lizzie Finch, Catherine Culp and
the unknown heirs at law of Polly Butler.....Defendants

 This cause in which the complainant appears to have pre-
ceeded in the mode prescribed by law against the non-resident de-
fendants, Cornelia Johnson, Catherine Culp and as to the unknown
heirs at law of Polly Butler, deceased, and the bill taken for
confessed as to Laban Reid, Rebecca Moss and Lizzie Finch, upon
whom process was executed, and was argued by counsel;

 On consideration whereof, the court doth adjudge, order
and decree that G. C. Bradshaw, W. A. Jakeman, Jesse L. Williams,
J. F. Culpepper and D. L. Sumner, who are hereby appointed commis-
sioners for the purpose, after having first been duly sworn, do
proceed to lay off and divide the real estate, as set out in the
bill and of which Dempsey Reid died seized and possessed, among
the parties entitled thereto, having regard to quality, quantity
and value.

 But if the said commissioners should find that partition
cannot be conveniently made of the said real estate among the afore-
said parties, then they are required to report the facts upon which
their opinion is based to the court, and also whether the interests
of those who are entitled to the said real estate, or its proceeds,
will be promoted by a sale of the entire real estate, or allotment
of part and sale of the residue, and what in their opinion is the
fee simple value of the whole of the real estate of which the said
Dempsey Reid died seized and possessed; and in either case they

are required to report their proceedings under this order to the court.

The court doth adjudge, order and decree further that if any of the parties interested should make an offer for the said property or any stranger, who is not a party to the suit, should make an offer for the said property, the said commissioners are required to report same to the court and their recommendation, and the reason for their recommendation.

Willie King.....Complainant.

vs. DECREE

Laban Reid, et alsDefendants.

Enter the 29 day of October,
1932.

Jan. L. W. Moore

Entered in Chancery Order Book
7, Page 3.

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA:

Willie King.....Complainant

vs.

DECREE

Laban Reid, et als.....Defendants

This cause came on again this day to be heard upon the papers formerly read and the report of G. C. Bradshaw, W. A. Jakeman, Jesse L. Williams, J. F. Culpepper and D. L. Sumner, Commissioners appointed by the decree entered herein on the 29th day of October, 1932, of the partition of the land in proceedings mentioned among the several parties entitled thereto agreeably to the terms of the said decree and was argued by counsel.

and by consent of all parties by their attorneys
On consideration whereof [^] it appearing to the Court in the partition made by said Commissioners: that

Lot Number 5, containing 4.15 acres, fell to the share of Cornelia Johnson and described as follows: Commencing on the North side of said highway 200 feet from the Western boundary of the Atlantic C.L. Railway property, thence running North 19°00' E. 730 feet to Shingle Creek, thence running Southwardly along Shingle Creek to the said State highway, thence Westwardly along the North side of the said highway to the point of beginning. This gives Cornelia Johnson a small wedged shape tract of land between the Creek, highway and Atlantic Coast Line Railroad;

Lot Number 4, containing 3.92 acres, fell to the share of Rebecca Moss and described as follows: Commencing at a point on the West of the Cornelia Johnson lot on the North side of said highway and running 190 feet Westwardly on the North side of the said highway to the Laban Reid land, thence N. 15°00' E. 990 feet to said Creek, thence South 270 feet to the line of Cornelia

Johnson, thence S. $19^{\circ}00'$ W. 730 feet to the point of beginning;

Lot Number 3, containing 4.38 acres, fell to the share of Laban Reid, described as follows: Commencing on the West at a point on the Rebecca Moss lot on the North side of said highway, thence running Westwardly on the North side of said highway 210 feet to the land of Lizzie Finch, thence N. $11^{\circ}10'$ E. 750 feet to the said branch on the North of said land, thence down said branch or cove East 410 feet to Shingle Creek, thence 85 feet Southwardly along said Creek to the land of Rebecca Moss, thence S. $15^{\circ}00'$ W. 990 feet to the point of beginning;

Lot Number 2, containing 4.02 acres, fell to the share of Lizzie Finch, described as follows: Commencing at a point on the West of the Laban Reid lot on the North side of said highway, thence running Westwardly along the North side of said highway 200 feet, thence along the Willie King and Catherine Culp land N. $4^{\circ}40'$ W. 498 feet to the Southern Railway boundaries, thence along the East side of the Southern Railway boundaries Northwardly to the culvert on said railway boundaries, thence Eastwardly 335 feet down a branch to the said land of Laban Reid, thence S. $11^{\circ}10'$ W. 750 feet to the point of beginning;

Lot Number 1, containing 4.28 acres, fell to the share of Willie King and Catherine Culp, described on the East side of the Southern Railway as follows: Commencing at a point on the West of the Lizzie Finch lot on the North side of said highway, thence running Westwardly along the Northern side of said highway to the Southern Railway boundaries, thence along the Eastern side of said Southern Railway boundaries Northwardly 578 feet, thence S. $4^{\circ}40'$ E. 498 feet to the point of beginning on said highway, and is described on the West side of said Southern Railway boundaries in the following way: Commencing at the West side of the Southern

Railway boundaries and on the North side of the said highway and running along an old ditch N. 17°00' W. 190 feet to a ravine or branch, thence following the various courses of said branch North-eastwardly to said Railway boundaries, thence Southwestwardly 913 feet along West side of said Railway boundaries to the point of beginning, the cemetery located on the part of this lot on the West side of the Southern Railway, together with an eight (8) foot driveway from said Highway to the said cemetery for ingress and egress thereto being reserved for the benefit of all parties to this proceeding, together with their families, it is adjudged, ordered and decreed that the said report of the said Commissioners be confirmed and that the partition in manner and form aforesaid made be held firm and stable.

And it is ordered that the costs of this suit be proportionally borne by the parties thereto and that the parties to this suit are required to pay to L. P. Holland and S. E. Everett, Attorneys, the sum of \$50.⁰⁰, for their legal services in these proceedings, and it is further ordered that the Clerk of the Court record the report of the Commissioners in this cause, ^{including the pleas filed therewith} together with this decree in the Deed Book and index it in the name of the person who had the land before. Also in the name of the persons who became entitled to the same under this partition.

DECEASED

VIRGINIA:

In the Clerk's Office of the Circuit Court
of Nansemond County, Virginia
This ²¹ ~~20th~~ day of November and 19³²
annexed, admitted to record.

Teste John H. Russell Clerk
By W. H. Garland D. C.

Deed Book No. 126
Page 269
for that Book
No 3 Page 165

Willie King,
Complainant

vs. DECREE

Laban Reid, et als,
Defendants

Enter the 17th day of November,
1932.

Jas. L. M. Moore

Entered in Chancery Order Book
No. 7 Page 12

*Have seen this
Decree.*

*L. J. [unclear]
for Plaintiff*

Willie King.....Complainant

vs. BILL

Laban Reid, Cornelia Johnson, Rebecca
Moss, Lizzie Finch, Catherine Culp and
the unknown heirs at law of Polly Butler.....Defendants

To the Honorable James L. McLemore, Judge of the Circuit Court of
Nansemond County, Virginia:

Humbly complaining show unto the Court your complainant,
Willie King, that Dempsey Reid died seized and possessed of a cer-
tain tract of land containing thirty (30) acres, more or less, situ-
ated in Cypress District, Nansemond County, Virginia, on the North
side of the new Suffolk-Portsmouth Highway #12 between Suffolk and
Magnolia, and bounded on the South by the said concrete highway, on
the East and North by Shingle Creek and on the West by a ravine
separating this land from the land formerly owned by Joe White. It
being the same land conveyed to Dempsey Reid by Elisha Norfleet on
the 8th day of May, 1852, and recorded in the Clerk's Office of the
Circuit Court of Nansemond County and said deed was destroyed when
said Clerk's Office was burned in 1866, afterward reconveyed by the
Norfleet heirs to the Dempsey Reid heirs (but the Dempsey Reid heirs
are not accurately named) See Deed Book 84, page 460.

The above tract of land is also bounded on the South by
a certain tract of land owned by Willie King and Catherine Culp, the
only children and heirs at law of Martha Reid, a daughter of Dempsey
Reid, described as follows: Fronting on the North side of the said
highway referred to above and commencing at the intersection of the
said highway with the land of the Southern Railway Company on the
North of the said highway and on the West of said Railway Company,
thence running on the West side of the said Southern Railway bounds
Northwardly thirty (30) feet, thence Northwestwardly along the line

of the Dempsey Reid property above described in the center of an old ditch two hundred (200) feet to a ravine separating this property from the land formerly owned by Joe White, thence up said ravine Southwestwardly three hundred and fifty (350) feet to the said concrete road and thence Eastwardly along said concrete road two hundred and forty-nine (249) feet to the point of the beginning.

That the said Dempsey Reid died around thirty years ago leaving his widow, Easter Reid, and the following heirs and distributees at law: Laban Reid, son; Cornelia Johnson, daughter; Rebecca Moss, daughter; Lizzie Finch, daughter; Willie King and Catherine Culp, grandson and granddaughter, children of Martha Reid King, daughter of Dempsey Reid, who is now dead, and Polly Butler who married after the death of Dempsey Reid and also died after the death of Dempsey Reid and her husband being dead.

If said property should be divided in kind it would be as follows: one-fifth to Laban Reid; one-fifth to Cornelia Johnson; one-fifth to Rebecca Moss; one-fifth to Lizzie Finch; and one-fifth to Willie King and Catherine Culp.

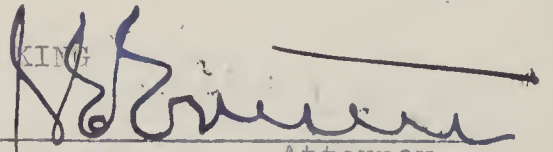
That the object of this suit is to procure a partition thereof in some method prescribed by law. Owing to the small size of said property and the number of interests it is obvious that a partition in kind is wholly impossible and no one of the parties interested is willing to take said property at its value and pay to the others the value of their respective shares, and your complainant ~~does~~ allege that it is to the advantage and interest of all parties concerned and the proceeds of the sale be divided by the Court amongst the various parties according to their respective rights in said lot of land.

Forasmuch as your complainant is remediless in the premises save in a Court of Equity, he prays that the said Laban Reid,

Cornelia Johnson, Rebecca Moss, Lizzie Finch, Catherine Culp, and the unknown heirs at law of Polly Butler, be made parties defendant to this bill and be required to answer the same; that partition of said lot of land be made and decreed in some manner prescribed by the statute, preferably by a sale of the whole thereof and division of the proceeds of the sale amongst the owners according to their interests; that in case the Court should decree a sale of said property in order to effect a partition thereof, the said offer of purchase be accepted; that all proper accounts and inquiries may be directed and taken; and that your complainant may receive all such other and further general relief as to equity may seem meet and the nature of their case may require.

WILLIE KING

By


Attorney

Willie King.....Complainant

vs. BILL

Laban Reid, et als...Defendants.

Filed the 14th day of September,
1932.

John H. Preece - Clerk