

1933-051
Narismond Co (Suffolk)

Chancery Causes: Hendricks T. Jones et al vs E A. Watkins & Bros.]

59

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA.

September 13, 1910.

Hendricks T. Jones, Mattie E. Jones,
and Mary T. Jones, by Mattie E. Jones,
her guardian-----Complainants.

vs.

E. A. Watkins, Dempsey Watkins, and Ludloe Watkins,
partners trading as E. A. Watkins & Company.
-----Defendants.

MEMORANDUM.

The clerk will issue chancery process against the
defendants to answer a bill of complaint returnable to 2nd
September Rules 1910.

Robt. W. Withers,

p. q.

Hendricks J. Jones
+ als.

42 } Chancery
E. A. Watkins & Bros.

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA.
September 13th, 1910.

Hendricks T. Jones, Mattie E. Jones and
Mary Jones by Mattie E. Jones, her guardian---Complainants.
vs.
E. A. Watkins, Dempsay Watkins and : In Chancery
Ludloe Watkins, partners trading as :
E. A. Watkins and Brothers-----Defendants.

Injunction Order.

This cause came on this day to be heard ex parte, on motion of complainants and on the bill of complaint duly sworn to and the exhibits filed therewith, and was argued by counsel.

On consideration whereof an injunction is granted in accordance with the prayer of said bill, enjoining and restraining E. A. Watkins, Dempsay Watkins and Ludloe Watkins, partners trading as E. A. Watkins and Brothers, their contractors, agents, servants, employees and any one over whom they have control from entering upon or cutting any trees or carrying any timber trees or logs from the lands of the complainants situated on the South side of the South Quay county road near the town of Holland in Holy Neck Magisterial District in Nansemond County, Virginia and containing four hundred and twenty-two acres more or less, and described as follows, bounded by the lands of A. Edwards, Jos. R. Jones, the lands formerly belonging to the estates of Z. T. Holland and Augustus Holland and others, and separated from the last two mentioned tracts by lines of marked trees, until the further order of this court.

But before the complainants shall have the benefit of this order they, or some one of them or some one for them shall enter into and acknowledge bond, with good security, before the clerk of this court in the penalty of \$300, conditioned according to law. But unless enlarged or disposed of according to law, the said injunction shall stand dissolved after November 1st, 1910.

James L. McLemore, Judge.

To the clerk of the circuit court of Nansemond County,
Virginia.

A Copy,

Teste:

R. R. Smith, Clerk
By M. M. Watkins D.C.

THE COMMONWEALTH OF VIRGINIA.

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

YOU ARE HEREBY COMMANDED TO SUMMON E. A. Watkins, Dempsey
Watkins and Ludlee Watkins, partners trading as E. A. Watkins and Brothers,

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~~ *Third* Monday in ~~September~~ *October*, 1910, to answer

a Bill in Chancery, exhibited against them
in the said Court by Hendricks T. Jones, Mattie E. Jones and Mary Jones, by
Mattie E. Jones, her guardian,

And have then and there this summons.

Witness, R. R. SMITH, Clerk of our said Court, at his office, this 14th day of
September, 1910, ~~xx~~, in the 18^{5th} year of the Commonwealth.

~~A copy~~ Teste:

CLERK.

Teste:

CLERK.

R. R. Smith
By M. M. Watkins D.C.

The bond required by the within injunction has been given with security deemed sufficient by me

September 14th, 1910.

Teste:

R. R. Smith, Clerk
By M. M. Watkins D.C.

W. W. Withers p. q.

Handricks Jones & Co.

IN CHANCERY.

vs.

E. A. Watkins & Bros.

1910

October

Rules.

Monday.

NANSEMOND CIRCUIT COURT.

PROCESS BOOK, No. 3

PAGE 89

Entered in the Registry on 16th day
of September 1910, by coming before me with
order of registration that attached as to a
particular matter and in due manner, to
reading on 5 am sitting and do nothing
I J. Lawrence D. C.
By M. M. Watkins D.C.

IN THE CIRCUIT COURT OF HANSEMOND COUNTY, VIRGINIA.

September 13, 1910.

H. T. Jones, et als.

vs.

H. A. Watkins et als.

Notice.

To H. A. Watkins, Dempsey Watkins, and Ludlow Watkins,
partners trading as H. A. Watkins & Brothers.

Take notice that we will move the Circuit Court of
Hansemond County to continue and extend the injunction order
issued in the above cause on the 13th day of September 1910 on
the first day of the October term of said court, being October
10th, 1910.

Respectfully
H. T. Jones
Mattie E Jones
Mary J. Jones by Mattie
E Jones her guardian
By Counsel.

Specimen in the line of
wood on the 16th
day of September 1910
by seeing copies thereof
as to A. M. Warding, Dempsey
Watkins and the other
Watkins, partners
trading as to A. M. Warding
and Dempsey

{ G. L. Jones D. G. L.
by W. A. Thompson
D. G. L.

Hendricks J. Jones
+ als.

W. } Chancery
C. A. Watkins + Bros.

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA.

September 13th 1910.

Hendricks T. Jones, Mattie E. Jones and
Mary Jones by Mattie R. Jones, her guardian-----Complainants.

vs.

E. A. Watkins, Dempsay Watkins and :
Ludloe Watkins, partners trading as :
E. A. Watkins and Brothers-----Defendants.

In Chancery.

Injunction Order.

This cause came on this day to be heard ex parte, ^{on motion of complainant and} on the
bill of complaint duly sworn to and the exhibits filed there-
with, and was argued by counsel.

On consideration whereof an injunction is granted in accord-
ance with the prayer of said bill, enjoining and restraining
E. A. Watkins, Dempsay Watkins and Ludloe Watkins, partners
trading as E. A. Watkins and Brothers, their contractors,
agents, servants, employees and any one over whom they have
control from entering upon or cutting any trees or carrying
any timber trees or logs from the lands of the complainants
situated on the South side of the South Quay county road near
the town of Holland in Holy Neck Magisterial District in Nan-
semond County, Virginia and containing four hundred and twenty-
two acres more or less, and described as follows, bounded by
the lands of A. Edwards, Jos. R. Jones, the lands formerly
belonging to the estates of Z. T. Holland and Augustus Holland
and others, and separated from the last two mentioned tracts
by lines of marked trees, until the further order of the court.

But before the complainants shall have the benefit of this
order they, or some one of them or some one for them shall
enter into and acknowledge bond, with good security, before
the clerk of this court in the penalty of \$300, condition-

all according to law. But unless enlarged or dispensed of according to the law the said injunction shall stand dissolved after November 1st 1910.

~~And this cause is continued.~~

A handwritten signature in cursive script, reading "J. M. L. Moore", written over a horizontal line.

Judge

To the clerk of the circuit court of Nansemond County,
Virginia.

Hendricks J. Jones
+ als.

v2 } Chancery
C. G. Watkins + Bros

Entd. Sept. 13. 1910.

James W. Moore,

Entered in Chancery Order
Book No. 4. Page 430.

Know All Men by These Presents, That we, Hendricks T. Jones,
Principal and Virginia Safe Deposit and Trust Corporation by W. E. MacClenny
Attorney in fact, Surety,

are held and firmly bound unto the COMMONWEALTH OF VIRGINIA in the just and full sum of
Three Hundred DOLLARS,

to the payment whereof, well and truly to be made to the Commonwealth of Virginia, we bind our-
selves, our heirs, executors and administrators, jointly and severally, firmly by these presents.

And we waive the benefit of our exemption as to this obligation, and also waive any claim or
right to discharge any liability to the Commonwealth arising under this bond, or by virtue of the
office, post or trust herein mentioned, with coupons detached from bonds of said State.

Sealed with our seals, and dated this day of in the year
of our Lord one thousand nine hundred and, and in the year of
the Commonwealth.

In Testimony Whereof, the said Hendricks T. Jones has
hereto set his hand and seal, and the said Virginia Safe Deposit and Trust Corporation
has caused its corporate name to be hereto signed, and its
corporate seal to be hereto affixed, this 14th day of September in the year of our
Lord, one thousand nine hundred and ten, and in the 135th year of the Commonwealth.

THE CONDITION OF THE ABOVE OBLIGATION IS SUCH, That if the above bound
Whereas an injunction is awarded against E. A. Watkins, Dempsey Watkins and
Ludloe Watkins, partners trading as E. A. Watkins and Brothers, on a bill in
chancery filed in vacation in the Circuit Court of Nansemond County in the
cause pending between Hendricks T. Jones and others complainants and said
E. A. Watkins and Brothers, defendants, enjoining and restraining the said
E. A. Watkins and Brothers, their servants, agents, employees, contractors,
and all other persons over whom they have control from trespassing or enter-
ing upon the lands of the complainants or from cutting or removing from
said lands any timber trees or logs of any kind whatsoever, as set forth in
said bill and injunction order entered in said cause, until the further order
of this Court. But before this injunction shall take effect the said com-
plainants or some one of them or some one for them shall enter into and
acknowledge bond with good security before the Clerk of this Court in the
penalty of \$300. conditioned to pay all such damages and costs as may be
awarded or incurred in case the injunction shall be dissolved.



Hendricks T. Jones
for complainants.



Virginia Safe Deposit and Trust Corporation
by W. E. MacClenny, atty. in fact.



VIRGINIA :

In the Clerk's Office of the Circuit Court of Nansemond County, on the 14th day
of September, 1910 :

The above bond was executed and acknowledged before me by the obligors to the same
(the security approved justifying), and ordered to be recorded.

Teste :

A copy, Teste:
R. R. Smith, Clerk
By A. L. Fritty, De.

R. R. Smith, Clerk
By Mr. Mr. Watkins, De.

Hendricks T Jones
To { Injunction Bond
The Commonwealth.

1910.
September 14.

Copy

IN THE CIRCUIT COURT OF NANCYMOND COUNTY, VIRGINIA.

October Term, 1910.

Hendricks T. Jones, et als.-----Complainants.

vs.

E. A. Watkins et als.-----Defendants.

Decree.

This cause came on again to be heard on the papers formerly read and on the affidavits of Hendricks T. Jones and J. H. Williams, the demurrer of defendants to complainants bill, in which complainants joined issue, and was argued by counsel.

On consideration whereof, but without in any way deciding upon the said demurrer, which is expressly reserved for the further consideration of the court, the injunction order heretofore granted the complainants against the defendants in this cause on the 13th day of September, 1910, and which otherwise would stand dissolved on November 1st, 1910, is hereby enlarged and continued in force ~~until the further order~~

for the period of sixty days from this date.

And this cause is continued.

Hendricks J.
Jones + als.
12. } Chancery
E. A. Watkins + Bros.

Enter.
Nov. 4. 1910.
Jas. L. McNamee

Entered in Chancery
Order Book No. 4-
Page 440

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA.

October Term, 1910.

Hendricks T. Jones et als.-----Plaintiffs.

VS.

E. A. Watkins et als. - Defendants.

AFFIDAVIT.

VIRGINIA,

Nansemond County, To-wit:-

This day W. L. Williams, personally appear-
ed before me, W. L. Leathers a N.P.

in and for the county and state
aforesaid and after being duly sworn made oath and said:

First: That some time about the year 1887 this affiant, acting as a surveyor, was called upon to establish the boundary line between the property of T. G. Jones and Zachary T. Holland near the Town of Holland, Virginia; that he together with the said T. G. Jones and Zachary T. Holland went upon the lands and established the said line and marked the same by a line of chopped trees; that he has recently been called upon by Hendrick T. Jones to identify the said line, which was done by him; that the said boundary line is easily located and the said chopped trees or most of them can be easily and plainly seen; that employees of E. A. Watkins & Brother have crossed the said line and cut trees upon the lands of T. G. Jones; that this affiant is ready and willing to point out said line to any person interested therein.

Second: That after the said boundary line was established by the survey above mentioned this affiant, who lives in the neighborhood of said property, never heard of any complaint or dispute about the said line between the said T. G. Jones and Zachary T. Holland nor has he ever heard any dispute between any other persons concerning the said line.

Given under my hand this
10th day of Oct

Given under my hand this
10th day of Oct 1910 W. W. Leather
my Comm. Expires H. B. 8. 12

Hendricks T. Jones et als.

vs.

E. A. Watkins et als.

AFFIDAVIT.

1910 Nov. 1. *filed*
JW

ROBERT W. WITHERS
ATTORNEY AT LAW
SUFFOLK, VA.

PRACTICING IN ALL COURTS IN
SECOND JUDICIAL CIRCUIT

SUFFOLK PRINTING AND STATIONERY CO., SUFFOLK, VA.

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA.

October Term, 1910.

Hendricks T. Jones et als.----- Plaintiffs.

vs.

E. A. Watkins et als. -----Defendants.

AFFIDAVIT.

VIRGINIA,

Nansemond County, To-wit:-

This Hendricks T. Jones personally appeared before me

W. B. Leathers a H. P.

in and for the county and

state aforesaid and after being duly sworn made oath and said:

First: That he is one of the plaintiffs in the chancery suit styled, Hendricks T. Jones et als. vs. E. A. Watkins et als. now pending in the circuit court of Nansemond County and that he has read the bill of complaint filed in said suit reference to which is hereby made, and that all of the allegations in said bill are true.

Second: That the line between the land whereof T. G. Jones died seized and possessed and the land adjacent thereto of which Zachary T. Holland died, seized and possessed, is a well defined line of marked trees, that there never has been so far as this affiant knows, any dispute about this boundary line among the previous owners of the lands in question; and that so far as he now knows there is not now any dispute about the location of said boundary line.

Third: Should the injunction heretofore granted the complainant be dissolved and the defendants permitted to trespass upon the complainants land and fell the pine timber thereon measuring ten (10) inches and upward across the stump leaving the complainants to their remedy at law for damages that the

complainants that the complainants would be irreparably injured and damaged and that such remedy in law would not adequately compensate the plaintiffs for the damages sustained by them for this to-wit: that the said described timber is practically all of the timber of sufficient size upon said farm to furnish the farm with the necessary wood, litter, rails and other necessary house botes, plough botes, and hay botes, and the plaintiffs would be deprived of the full enjoyment of the premises.

Amelrichs T. Jones

Given under my hand this 10th day of

October

1910 .

W. V. Leathers

~~J. P.~~ or N. P.

My Comm. Expires Sept 30-14.

Hendricks T. Jones et als.

vs.

E. A. Watkins et als.

A F F I D A V I T .

1910 Court 1st. filed
J.M.

ROBERT W. WITHERS

ATTORNEY AT LAW

SUFFOLK, VA.

PRACTICING IN ALL COURTS IN
SECOND JUDICIAL CIRCUIT

SUFFOLK PRINTING AND STATIONERY CO., SUFFOLK, VA.

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA.

January Term, 1911.

Hendricks T. Jones et als.-----Complainants.

vs.

E. A. Watkins et als.-----Defendants.

DECREE.

This cause came on again to be heard on the papers formerly read and on the motion of Hendricks T. Jones to enlarge and continue in force the injunction order heretofore entered in this cause, and was argued by counsel.

On consideration ~~whereof~~ thereof and without deciding any of the matters at issue between the parties in this cause, the injunction order heretofore granted the complainants against the defendants in this cause, on the 13th day of September, 1910 and which otherwise would stand dissolved, is hereby enlarged and continued in force for ninety (90) days from this date. And this cause is continued.

Hendricks T. Jones et als.,
vs. ~~In~~ Decree.
E. A. Watkins et als.,

Enter Feb. 6th 1911.
James McShore

Entered in Chancery Order Book
No. 4- Page 459.

IN THE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA.

September 8th, 1910.

Hendricks T. Jones, Mattie E. Jones and
Mary Jones, by Mattie E. Jones, her guardian-----Complainants.

vs.

E. A. Watkins, Dempsey Watkins, and Ludloe Watkins, partners
trading as E. A. Watkins and Brothers-----Defendants.

Injunction Bill.

Humbly complaining, your orators, Hendricks T. Jones
Mattie E. Jones, and Mary Jones by Mattie E. Jones, her guar-
dian of Nansemond County, Virginia, sheweth unto your honor
the following facts:

First: Your orators are the owners in fee simple and are
now and have been for about two years in actual possession of
a certain farm and woodland near the town of Holland in Holy
Neck Magisterial District in Nansemond County, Virginia, con-
taining four hundred and twenty two acres of land, more or less
and bounded by the lands of A. Edwards, Joseph R. Jones, the
lands formerly belonging to Z. T. Holland's estate and Augustus
Holland's estate and others, and divided from the last two
mentioned tracts by lines of marked trees, that said land was
formerly owned and possessed by Tiberius Gracchus Jones, who
acquired the same from Wm. T. Jones and wife by deed dated
April 27th 1887 as will appear from a copy of said deed filed
with this bill and prayed to be read as a part thereof,
as exhibit "A" and since said date he and his heirs have been
x
in open and undisputed possession thereof; that said Tiberius
G. Jones departed this life on October 26, 1908 intestate and
leaving a widow, Mattie E. Jones and three children, to-wit
Hendricks T. Jones, Pearl Jones and Mary Jones as his heirs at
law; that Pearl Jones, an adult, by deed dated March 18th 1909
conveyed all of her interest in the above mentioned land to
Hendricks T. Jones as will appear from a copy of said deed

filed herewith as exhibit "B" and prayed to be read as a part of this bill; that Mattie E. Jones qualified before this court or its clerk as guardian of Mary Jones, an infant; that there has never been, and so far as your orators are advised there is not now any dispute as to the true boundary line between your orators property and the lands formerly belonging to the estate of Z. T. Holland.

Second: That the lands above mentioned consists of woodland and arable land, the latter having been and is now being used as farm land; that a few years ago, to-wit six years ago, the said Tiberius G. Jones, sold to the Wolworth, Nevell Lumber Company certain of the standing pine timber over 10 inches across the stump then growing on said farm; that said purchasers cut off all of said timber except certain timber near the boundary line of the estate of Z. T. Holland which was left standing in payment of certain timber under size cut by said Wolworth Nevell Lumber Company from said land; that there are about twenty-five thousand board feet of said timber measuring over 10 inches in diameter twelve inches from the ground on said farm and that is all the timber on said farm of sufficient size to furnish said farm and its occupants with necessary house botes, plough botes and hay botes and if said timber is cut from said land irreparable injury will be done thereby, and the just and full enjoyment of the premises would be impaired.

Third: That the adjoining lands to said standing timber formerly belonged to the estate of Z. T. Holland, deceased; that Paul L. Everett acquired the same some time in the year 1909, and by deed dated March 8th 1910 the said Paul L. Everett and wife sold and conveyed to E. A. Watkins, Dempsay Watkins and Ludloe Watkins, partners trading as E. A. Watkins and Brothers, of Norfolk, Virginia all of the standing pine timber 10 inches across the stump 12 inches from the ground on said

lands formerly belonging to Z. T. Holland adjoining the lands of your complainants, and granted to said purchasers the right to cut and remove said timber at any time within three years from the date of said deed.

Fourth:- That on the day of 1910 and at divers other times, since said date, the said E. A. Watkins and Brothers, by and through their contractors, agents and servants entered upon the lands of your complainants above described without their consent and cut and removed large quantities of standing pine timber, to-wit, *eight and one half* thousand board feet of the value of six dollars per thousand board feet, to the damage of the complainants; and said E. A. Watkins and brothers openly threaten to continually trespass upon the lands of your complainants and to cut and remove said standing timber measuring 10 inches and over across the stump 12 inches from the ground; that by reason of the scarcity of large timber on their said farm, such trespasses could not be adequately compensated for by the payment of damages and such continual trespasses would result in a multiplicity of actions.

In tender consideration whereof, and for as much as your orators are remediless in the premises save by the aid of a court of equity, your orators pray that E. A. Watkins, Dempsay Watkins and Ludloe Watkins, partners trading as E. A. Watkins and Brothers be made parties defendant to this bill and required to answer the same, though not under oath, it being waived; that your honor will cause to be issued a writ of injunction, enjoining and restraining the said E. A. Watkins Dempsay Watkins and Ludloe Watkins, partners trading as E. A. Watkins and Brothers, their servants, agents, employees, contractors and all other persons over whom they have control from trespassing or entering upon the lands of your complainants above described or from cutting or removing from said lands any timber trees or logs of any kind whatsoever; that damages

may be awarded your complainants against said defendants for the said damages for the said several trespasses and cutting and removing of timber trees from the lands aforesaid heretofore committed by said defendants or their contractors, servants or agents; that all such references be made and orders and decrees entered as may be necessary in the premises or to equity shall seem meet. And your orators will ever pray, etc.

H.T.J. signature
Mattie E. J. " "
Mary J. by M.E.J. as
Guardian ad litem

Hendricks T. Jones
Mattie E. Jones
Mary J. Jones by M.E. Jones as Guardian

VIRGINIA,

Nansemond County, To-wit:-

I, Ellen E. Riddick a Notary
Public-----for the county and state aforesaid do certify that Hendricks T. Jones, one of the complainants in the above bill, personally appeared before me in my county aforesaid and made oath that the allegations contained in the foregoing bill, which he makes are of his own knowledge and are true.

Given under my hand this 12th day of September, 1910

Ellen E. Riddick

my commission expires on the 24th day of Dec. 1913

Exhibit a

THIS DEED, made the 27th day of April one thousand and eight hundred and eighty-seven between William T. Jones and Angeline, his wife of the county of Nansemond in the state of Virginia, of the one part and Tiberius G. Jones, of said county and state, of the other part,

WITNESSETH: That in consideration of the sum of Twelve Hundred dollars (\$1200.00) in hand paid the said William T. Jones and Angeline, his wife do grant, with general warranty unto the said Tiberius G. Jones, and to his heirs and assigns forever the following real estate to-wit; a certain tract of land lying and being in Holy Neck Magisterial District in the Upper Parish of Nansemond County in the state of Virginia formerly belonging to the estate of Isaac P. Barnes, now deceased, and on which the said T. G. Jones, now resides, containing about four hundred and twenty two (422) acres more or less, and bounded by the lands of Augustus Holland, Z. T. Holland, Jos. R. Jones A. Edwards and others, subject however to the dower interest of Eudora Ellen Jones, formerly Barnes, together with all and singular the appurtenances belonging to the same.

And the said William T. Jones covenants that he has the right to convey the said land to the said grantee, that the said grantee shall have quiet possession of the said land, that he has done no act to encumber the said land; and that he will execute such further assurances of the said land as may be requisite.

Witness the following signatures and seals.

:
Witness:
:

Wm. T. Jones (Seal)

Angeline Jones (Seal)

STATE OF VIRGINIA :
 :
County of Nansemond :
 :

To-wit:-

I, R. H. Rawles, a Notary Public in and for the county aforesaid in the State of Virginia, do certify that Angeline Jones the wife of Wm. T. Jones whose names are signed to the writing above bearing date the 27th day of April 1887, personally appeared before me in the county aforesaid, and being duly examined by me privily and apart from her said husband and having the writing aforesaid fully explained to her, she the said Angeline Jones acknowledged the said writing to be her act and declared that she had willingly executed the same and does not wish to retract it.

Given under my hand this 27th day of April, eighteen hundred and eighty-seven.

R. H. Rawles,
Notary Public.

VIRGINIA

:

To-wit:-

County of Nansemond:

I, R. H. Rawles, a Notary Public in and for the said county, in the state of Virginia, do certify that Wm. T. Jones whose name is is signed to the writing above bearing date the 27th day of April 1887 has acknowledged the same before me in the county aforesaid.

Given under my hand this 27th day of April 1887.

R. H. Rawles?

Notary Public.

Exhibit B.

Whereas, Tiberius Gracchus Jones, late of the county of Nansemond was seized and possessed of certain lands tenements and hereditaments lying in the county of Nansemond, in the city of Newport News and the city and county of Norfolk in the state of Virginia, as will more fully appear from the records in the proper clerk's offices of said counties and cities, reference to which is hereby made for a complete and accurate description thereof; and,

Whereas, the said Tiberius Gracchus Jones departed this life on the 26th day of October 1908 intestate and leaving a widow and three children as his heirs at law; and,

Whereas, it is the desire of Pearl Jones an unmarried adult daughter of said intestate to convert all of her undivided interest in her father's real property unto money without delay or expense,

Now, therefore, this deed made this 18th day of March 1909 between Pearl Jones an unmarried adult of Nansemond County, Virginia, party of the first part and Hendricks T. Jones of Nansemond County, Virginia, party of the second part-

WITNESSETH: That for and in consideration of the sum of Three Thousand dollars, (\$3,000.00) the receipt of which is hereby acknowledged the said Pearl Jones doth grant, bargain sell and convey unto the said Hendricks T. Jones, with general warranty, all of her undivided interest, in possession, expectancy in remainder or in reversion both at law and in equity including the reversion after the estate of the widow's dower, in and to all of the lands, tenements and hereditaments of which the late Tiberius Gracchus Jones, late of the county of Nansemond in the state of Virginia, died seized and possessed of an estate of inheritance, either at law or in equity, including equities of redemption, whenever located. Reference is hereby made to the records of deeds in the clerk's offices of the proper courts of Norfolk City, Norfolk County, Newport

News City and Nansemond County, Virginia, for a fuller and more accurate description of the lands, tenements and hereditainments belonging to the late Tiberius Gracchus Jones, which descriptions are intended to be regarded and read in this deed as if fully re-written herein.

The said Pearl Jones covenants that she has the right to convey the said undivided interest in the said lands, tenements and hereditainments to the grantee; that she has done no act to encumber the same; that the grantee shall have quiet possession of the said lands, free from all encumbrances and that she the said party of the first part, will execute such further assurances of the said land as may be requisite.

Witness the following signature and seal

Pearl Jones (Seal)

STATE OF VIRGINIA

County of Nansemond : To-wit:-
:

I, Robert W. Withers, a Commissioner in Chancery of the Circuit Court for the county and state aforesaid, do certify that Pearl Jones whose name is signed to the writing above bearing date on the 18th day of March 1909 has acknowledged the same before me in my county aforesaid.

Given under my hand this 18th day of March 1909.

Robt. W. Withers, Comr. in Chany.

Hendricks T. Jones, Mattie
E. Jones, and Mary Jones,

by Mattie E. Jones,
her guardian

vs.

E. A. Watkins, Dempsey
Watkins, & Ludloe Watkins,

INJUNCTION BILL.

ROBT. W. WITHERS,

ATTORNEY AT LAW,

SUFFOLK, VA.

PRACTICING IN ALL COURTS IN
FIRST JUDICIAL CIRCUIT.

JEWELL & COMPANY, PHILADELPHIA.

*Filed Sept 13th 1910
M. M. Watkins D.C.*

Notes

Hendricks J.

Jones & als.

12 } Chauncery

E. A. Watkins & Bros.

Hendricks J. Jones & others.
v. J. Chancery.
E. A. Watkins & others

1910 Sept. 14 - Process issued returnable to finish
Octo rules = Injunction order attached.
Executed

1910 - 1st Octo. rules = Bill filed and Decree nisi

1910 - 2nd Octo. rules = Decree nisi confirmed and
cause set for hearing -

Robt. W. Withers, py

Hendricks J. Jones & others
vs Chancery.

E. A. Watkins & Bros.

59