

1933-196
Nansemond Co (Suffolk)

Chancery Causes: Annie L. Scott vs E. A. Scott

140

Steward, Hill

The Commonwealth of Virginia,

To the Sheriff of the County of Nansemond, Greeting:

WE COMMAND YOU, That you summon E.A.Scott

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 August, 19 25,
to answer a bill in chancery, exhibited against him in our said Court by
Annie L.Scott

And have then there this writ. Witness C.E.Bunting, Clerk of our said
Court, at the court-house, the 12th day of August, 19 25, and in the
150th year of the Commonwealth.

C.E.Bunting, Clerk

Original No. 300

Annie L. Scott

vs. }

SUBPOENA IN CHANCERY

E. A. Scott

Saunders & Hutton, ... p. q.

To August Rules,
3rd Monday, 1925
Nansemond County Circuit Court.

Executed on the 19 day of
Aug. 1925 within the county of
Nansemond, by delivering a
true copy of the within process,

in writing, to E. A. Scott

..... in person

E. B. Rawler
Sherriff of Nansemond County.

Annie L. Scott.....Complainant.

v.

IN CHANCERY

E. A. Scott.....Defendant.

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

Please issue summons returnable to Second August Rules,
1925.

Samuel Hutton
p. q.

RULE NOTES:

Aug, 12, 1925

Process issued returnable to August Rules, 3rd Monday, 1925

Annie L. Scott,
Complainant,

vs. IN CHANCERY

E. A. Scott,
Defendant.

TO E. A. SCOTT:

Take Notice, that on the 17th day of September, 1925, at the office of Saunders and Hutton, Pinner Building, in the City of Suffolk, Virginia, between the hours of ten A. M. and five P. M., of that day, I shall proceed to take the depositions of Pompey Hill and others, to be read as evidence in my behalf in a certain suit in chancery, depending in the Circuit Court of the County of Nansemond, wherein I am the complainant, and you are the defendant, and if from any cause the taking of the said depositions be not commenced, or, if commenced, be not concluded on that day, the taking thereof will be adjourned from time to time, at the same place, and between the same hours until the same shall be completed.

Given under my hand this the 12th day of August, 1925.

Emmie L. Scott
Complainant.

By Saunders & Hutton
Her Attorneys

Annie L. Scott,
Complainant,

Vs. IN CHANCERY

E. A. Scott,
Defendant.

NOTICE TO TAKE DEPOSITIONS.

ORIGINAL.

Executed on the 19th day of
Aug 1895 within the county of
Nassau, by delivering a
true copy of the within process,

in writing, to *E. A. Scott*

..... in person
E. B. Hawley
Sheriff of Nassau County.

VIRGINIA:

IN THE CIRCUIT COURT OF THE COUNTY OF NANSEMOND:

ANNIE L. SCOTT.....COMPLAINANT

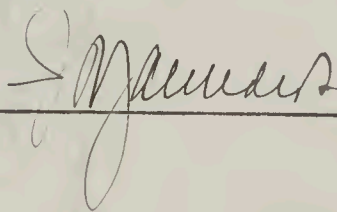
V. IN CHANCERY MEMORANDUM

E. A. SCOTT.....DEFENDANT.

TO THE CLERK OF SAID COURT:

PLEASE ISSUE SUMMONS, FIRST RULES, FIRST MONDAY IN JULY,

1931.



P. Q.

VIRGINIA:

IN THE CIRCUIT COURT OF THE
COUNTY OF NANSEMOND:

ANNIE L. SCOTT,
COMPLAINANT,

v.

E. A. SCOTT,
DEFENDANT.

MEMORANDUM.

*Filed this 1st day
of July 1931
John H. Powell clerk*

MARRIAGE LICENSE

Virginia Southampton 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,

E. A. Scott and Annie L. Steward
Given under my hand, as Clerk of Circuit Court of Southampton County (or City) this 19 day of May, 1899 B. F. McElmore Clerk.

MARRIAGE CERTIFICATE

To be annexed to the license, required by Section 2229 of the Code of Virginia, as amended by Act of February 16, 1910.

VIRGINIA: In the Clerk's Office of the Circuit Court for the County (or City) of Southampton
Date of Marriage May 21 1899 Place of Marriage Southampton Co.

FULL NAMES OF PARTIES.

E. A. Scott and Annie L. Steward
Age of Husband 34 years; Condition (single, widowed or divorced) Single
Age of Wife 24 years; Condition (single, widowed or divorced) Single

Race (White or Colored) Col.
Husband's Place of Birth Southampton Co. Residence Southampton Co.
Wife's Place of Birth " Residence "

Names of { Husband Mr. Rhoda Scott
Parents { Wife Henry and Caroline Steward
Occupation of Husband Laborer

Given under my hand this 19 day of May, 1899 B. F. McElmore Clerk.

Certificate of Time and Place of Marriage

I, J. B. Whedder, a _____ of the _____
Church, or religious order of that name, do certify that on the 21st day of May, 1899
at Hampton, Southampton Co., Virginia, under authority of the above License, I joined together in the Holy State of Matrimony the persons named and described therein. I qualified and gave bond according to law authorizing me to celebrate the rites of marriage in the County (or City) of _____, State of Virginia.
Given under my hand this 21st day of May, 1899

J. B. Whedder
(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 2229 of the Code of Virginia, as amended by Act approved February 16, 1910, Acts 1910, chapter 28, pages 36 and 37).

a copy - sent to H. P. M. McElmore, Clerk
By: B. F. McElmore, D.C.

County (or City) Southampton

E. A. Scott Husband

and { **Marriage License**

Annie L. Steward Wife

Date of Issue 1899-May 19

Marriage Register No. _____ Page 559

ANNIE L. SCOTT.....COMPLAINANT
V.
E. A. SCOTT.....DEFENDANT.

TO THE HONORABLE CIRCUIT COURT OF NANSEMOND COUNTY, VIRGINIA:

YOUR COMPLAINANT, ANNIE L. SCOTT, RESPECTFULLY REPRESENTS:

FIRST: THAT ON THE *21st* DAY OF MAY, 189*8*⁹, YOUR COMPLAINANT WAS LAWFULLY MARRIED TO E. A. SCOTT AS WILL APPEAR FROM A CERTIFICATE OF MARRIAGE HERewith FILED, MARKED "EXHIBIT A" AND MADE A PART OF THIS BILL; AND,

SECOND: THAT CONTINUOUSLY FROM THE DATE OF SAID MARRIAGE UNTIL THE MONTH OF OCTOBER, 1908, YOUR COMPLAINANT AND THE SAID DEFENDANT LIVED TOGETHER AS MAN AND WIFE AND ~~THAT IN SAID LAST MENTIONED MONTH~~ ^{but} YOUR COMPLAINANT WAS COMPELLED TO LEAVE THE SAID DEFENDANT ON ACCOUNT ^{criminally and otherwise} OF MISCONDUCT ON HIS PART; AND,

THIRD: THAT THE SAID DEFENDANT HAS SINCE THE AFORESAID SEPARATION COMMITTED ADULTERY ON NUMEROUS OCCASIONS WITH ~~THE~~ ^{Chetta} ONE CLARA PARKER IN NANSEMOND COUNTY, VIRGINIA; THAT SAID DEFENDANT HAS FOR SEVERAL YEARS LIVED ^{in open adultery} WITH THE SAID ~~CLARA~~ ^{Chetta} PARKER AND ~~THAT~~ AS THE RESULT OF SUCH ^{intercourse} COHABITATION YOUR COMPLAINANT HAS BEEN ADVISED ^{and here states} THAT ~~TWO~~ ^{four} CHILDREN HAVE BEEN BORN TO THE SAID ~~CLARA~~ ^{Chetta} PARKER.

FOURTH: THAT SINCE THE AFORESAID SEPARATION ^{in October 1908} ~~THIS~~ COMPLAINANT ^{cohabited} HAS NOT LIVED WITH, OR HAD ANYTHING WHATSOEVER TO DO WITH, THE SAID DEFENDANT.

FIFTH; THAT YOUR COMPLAINANT HAS RESIDED AND BEEN DOMICILED IN THIS STATE EVER SINCE THE AFORESAID MARRIAGE AND FOR MORE THAN ONE YEAR NEXT PRECEDING THE COMMENCEMENT OF THIS SUIT, AND IS DOMICILED AND NOW RESIDES IN THIS STATE; AND,

SIXTH: THAT THE SAID DEFENDANT ^{is} WAS DOMICILED ~~IN~~ ^{now} AND RESIDED IN NANSEMOND COUNTY, VIRGINIA, AT THE TIME THIS SUIT WAS COMMENCED AND NOW RESIDES IN SAID COUNTY.

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 E. A. SCOTT 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 PROPER PROCESS MAY
BE ISSUED; THAT A DIVORCE FROM THE BOND OF MATRIMONY WHICH WAS
CREATED BY THE AFORESAID MARRIAGE BE DECREED HER; AND THAT YOUR
COMPLAINANT MAY HAVE ALL SUCH OTHER, FURTHER AND GENERAL RELIEF
IN THE PREMISES AS THE NATURE OF HER CASE MAY REQUIRE OR TO EQUITY
SHALL SEEM MEET. AND YOUR COMPLAINANT WILL EVER PRAY.

Annie L. Scott

BY COUNSEL.

Saunders & Sutton
COUNSEL.

Annie L. Scott,
Complainant,
Vs. In Chancery BILL
E. A. Scott,
Defendant.

Filed Aug. 17, 1885
H. A. Hutton,
Secy

SAUNDERS & HUTTON
Attorneys at Law
Suffolk, Va.

ANNIE L. SCOTT.....COMPLAINANT

V.

E. A. SCOTT.....DEFENDANT.

TO THE HONORABLE JAMES L. MCLEMORE, JUDGE OF THE CIRCUIT COURT OF
NANSEMOND COUNTY, VIRGINIA:

YOUR COMPLAINANT, ANNIE L. SCOTT, RESPECTFULLY REPRESENTS:

FIRST: THAT ON THE 21ST DAY OF MAY, 1899, YOUR COMPLAINANT WAS LAWFULLY MARRIED TO E. A. SCOTT AS WILL APPEAR FROM A CERTIFICATE OF MARRIAGE HEREWITH FILED, MARKED "EXHIBIT A" AND MADE A PART OF THIS BILL.

SECOND: THAT CONTINUOUSLY FROM THE DATE OF SAID MARRIAGE UNTIL THE MONTH OF OCTOBER, 1908, YOUR COMPLAINANT AND THE SAID DEFENDANT LIVED TOGETHER AS MAN AND WIFE BUT YOUR COMPLAINANT WAS COMPELLED TO LEAVE THE SAID DEFENDANT ON ACCOUNT OF CRUELTY, MISCONDUCT AND ABUSES ON HIS PART.

THIRD: THAT THE SAID DEFENDANT HAS SINCE THE AFORESAID SEPARATION COMMITTED ADULTERY ON NUMEROUS OCCASIONS WITH ONE CHETTA PARKER IN NANSEMOND COUNTY, VIRGINIA; THAT SAID DEFENDANT HAS FOR SEVERAL YEARS LIVED ^{and now lives} IN OPEN ADULTERY WITH THE SAID CHETTA PARKER AND AS THE RESULT OF SUCH UNLAWFUL COHABITATION YOUR COMPLAINANT HAS BEEN ADVISED AND HERE STATES THAT FOUR OR FIVE CHILDREN HAVE BEEN BORN TO THE SAID CHETTA PARKER.

FOURTH: THAT SINCE THE AFORESAID SEPARATION IN OCTOBER, 1908, YOUR COMPLAINANT HAS NOT COHABITED WITH THE SAID DEFENDANT.

FIFTH: THAT YOUR COMPLAINANT HAS RESIDED AND BEEN DOMICILED IN THIS STATE EVER SINCE THE AFORESAID MARRIAGE AND FOR MORE THAN ONE YEAR NEXT PRECEDING THE COMMENCEMENT OF THIS SUIT, AND IS DOMICILED AND NOW RESIDES IN THIS STATE.

SIXTH: THAT THE SAID DEFENDANT IS DOMICILED AND NOW RESIDES IN NANSEMOND COUNTY, VIRGINIA.

IN CONSIDERATION WHEREOF, AND FORASMUCH AS YOUR COMPLAIN -
ANT IS REMEDILESS IN THE PREMISES SAVE IN A COURT OF EQUITY, YOUR
COMPLAINANT PRAYS THAT THE SAID E. A. SCOTT 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 PROPER PROCESS MAY
BE ISSUED; THAT A DIVORCE FROM THE BOND OF MATRIMONY WHICH WAS
CREATED BY THE AFORESAID MARRIAGE BE DECREED HER; AND THAT YOUR
COMPLAINANT MAY HAVE ALL SUCH OTHER, FURTHER AND GENERAL RELIEF
IN THE PREMISES AS THE NATURE OF HER CASE MAY REQUIRE OR TO EQUITY
SHALL SEEM MEET. AND YOUR COMPLAINANT WILL EVER PRAY.

Annie L. Leese

BY COUNSEL.

J. M. Leese

COUNSEL.

VIRGINIA:

IN THE CIRCUIT COURT OF THE CIR*
CUIT COURT OF NANSEMOND COUNTY:

ANNIE L. SCOTT,
COMPLAINANT

v. BILL

E. A. SCOTT,
DEFENDANT.

*Filed this 1st day
of July 1931.
John H. Howell - clu.*

SAUNDERS & HUTTON
Attorneys at Law
Suffolk, Va.

Samuel & Thelma, Jr.

Anna R. Peck

1897

C. A. Peck

140

Keypoint

Aug. 12, 1935 \$ 7.50

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