

1933-157

Nensemond County (Suffolk)

Chancery Causes: Amanda Edwards

vs

Mattie E. Jones & c by

185

* All old chancery cases dismissed in this year

To Clerk Circuit Court of Nansemond County:-

Amanda Edwards-

Complainant

vs-

Mattie E. Jones, widow of T. G. Jones, deceased, and Hendricks T. Jones, Pearl Jones and Mary Jones, the last of whom is an infant under the age of twenty one years- Defendants.

Issue summons in Chancery to Rules on 3rd Monday in Sept.
1909.

Pay \$1.50

E. E. Hollander
R. S.

Memorandum

Amanda Edwards

21

Mattie E. Jones to the

Recd Amanda Edwards
Fifteen dollars on
D. + Five dollars
D. \$20 on
D. Dec 16-1907
S. J. Jones

Recd Amanda Edwards
Twenty dollars in a
H. Land, on which
she lives on
Mar 12/08 S. J. Jones

Pick if possible
Edwards, Sen.
Holland & Eighly
Also in field of
hay meadow on lot
of land on which
specimens of timber
also

Jan 10/1908 T. G. Jones

#15 or

Rec'd from da Edwards
Fifteen dollars in port.
on Land

Mar 11 - 1907

J. G. Jones

Rec'd of Anna Maria
Edwards following
Dollars in part payment
on a lot sold to her
on the North Side
Dorchester Ry.

Sept-17 1907

J. G. Jones

Rec'd of Amos

Rec'd of Amanda Edwards
Fifteen Dollars in part-
mt on Land & Lumber
June 14/90 J G Jones

J. G. Jones

This is to Certify that I have
agreed to sell to Amanda Edwards
one lot of land adjoining Jones
Scotts Fifty feet front and
Hundred & ten feet long for one
Hundred dollars, I further agree
that she is to pay Twenty dollars
Cash and is to pay Fifteen
dollars every three months until
the whole amount is ^{paid} Then I am
to give her a Deed for the
this lot and if she fails to
Comply with a agreement she is
to lose all she has paid &
lose the said lot unless I
see fit to give her a deed
This agreement is agreed
upon by both parties as
witness our hands & seal this

tweth day november 1906.

J. G. Jones

Sent

Amanda Edwards

Sent

Net. M. J. Howell.

Amanda Edwards

2 } In Chancery

Walter C. Jones, sub.

36 ✓
 25 ✓
 38 ✓
 25 ✓
 36 ✓
 50 ✓
 50 ✓
 15 ✓
~~15~~
 15 ✓
 15 ✓
 15 ✓
 16 ✓
 18 ✓
 10 ✓
~~18~~
 18 ✓
 35 ✓
 20 ✓
 20 ✓
 28 ✓
 36 ✓

Jay

150

Atty

1500

Steff

249-

July 31, 1911
 Amanda Edwards
 V3
 Mathie E. Jones et als

Atty

6.64

180
 18
 14

Amanda Edwards

vs } In Chancery

Mattie E Jones & others

1909 Sept 15th Process issued returnable

Sept Rules 3rd Monday.

Guardian ad litem

appointed for Inf-
defendant.

" " 20. Process returned service

accepted for adult defts

But filed
and decree vs them

" Oct. 4th Decree nisi confirmed

and cause set for
hearing.

Chancery

Notes.

Amanda Edwards

re } in Chancery

Matthie C. Jones also.

THE COMMONWEALTH OF VIRGINIA.

TO THE SHERIFF OF NANSEMOND COUNTY—GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON *Mattie E Jones*
widow of T G Jones deceased and Hendricks
T Jones, Pearl Jones and Mary Jones, the
last of whom is an infant under the age
of twenty one year

to appear at the Clerk's Office of the Circuit Court of Nansemond County, at the Rules to be
 held for the said Court, on the *Third* Monday in *September 1909*, to answer
a Bill in Chancery, exhibited against *them*
 in the said Court by *Amanda Edwards*.

And have then and there this summons.

Witness, R. R. SMITH, Clerk of our said Court, at his office, this *15th* day of
September, 1909, in the 13⁴ year of the Commonwealth.

A copy—Teste:

CLERK. }

Teste:

R. R. Smith

CLERK.

By A. E. Gomez D.C.

E E Holland p. q.

Amanda Edwards

vs.

}

IN CHANCERY.

Mattie E Jones

Widow of J. E. Jones &c

1907

September Rules.

Third Monday.

NANSEMOND CIRCUIT COURT.

PROCESS BOOK, No. 3

PAGE 74

1907. Sept. 16. Rules legal and sufficient
service of the within summons is
hereby accepted.

Mattie E Jones
Hudson's
Pecore Jones }
1907
Sept. 17. Mrs.
the counsel

THE COMMONWEALTH OF VIRGINIA.

TO THE SHERIFF OF NANSEMOND COUNTY—GREETING:

YOU ARE HEREBY COMMANDED TO SUMMON

Mattie E Jones
Widow of J E Jones deceased and Rudricks
S. Jones, Pearl Jones and Mary Jones the
last of whom is an infant under the age
of twenty one years

to appear at the Clerk's Office of the Circuit Court of Nansemond County, at the Rules to be
 held for the said Court, on the *Third* Monday in *September 1909*, to answer
a Bill in Chancery, exhibited against *them*
 in the said Court by *Amanda Edwards*

And have then and there this summons.

Witness. R. R. SMITH, Clerk of our said Court. at his office, this *15th* day of
September, 1909, in the 134th year of the Commonwealth.

A copy—Teste:

R R Smith, CLERK. }
By A. L. Gomer DC

Teste:

R R Smith, CLERK.
By A. L. Gomer DC

E E Holland p. q.

A copy for

vs. }

IN CHANCERY.

Mary Jones

Inf

1909

September Rules.

Third Monday.

NANSEMOND CIRCUIT COURT.

PROCESS BOOK, No. *3*

PAGE *74*

Amanda Edwards
vs } In Chancery
Mattie E Jones & others

On motion of the Complainant
by Counsel Robert W. Wilkins a discreet
and competent attorney at Law is
hereby appointed guardian
ad litem to Mary Jones infant
defendant in this cause to defend
her interest in this suit.

Sept 15th 1909.

A. J. Gormley D.C.

R W Wether

Edrad Lilew

Amanda Edwards

R } In Chancery

Mattie E. Jones oals.

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

AMANDA EDWARDS

vs

MATTIE B. JONES and others.

TO THE HONORABLE JAMES L. McLEMORE, JUDGE OF
SAID COURT.

The undersigned commissioner begs to report that, pursuant to a decree entered in the above entitled cause, he has made to Amanda Edwards a deed for a certain lot of land at Holland, Virginia, fronting on the Southern Railroad fifty (50) feet and running back therefrom one hundred and ten (110) feet, adjoining the lands of Jane Scott and others.

Your commissioner now finds that, according to the contract made between the plaintiff and T. G. Jones, the lot purchased by her is a certain lot of land at Holland, Virginia, fronting on the Southern Railroad fifty (50) feet and running back therefrom two hundred and ten (210) feet, and adjoining the lands of Jane Scott and others.

It would, therefore, appear that, according to her contract, the plaintiff is entitled to a deed for one hundred (100) feet in the rear of the lot for which a deed has already been made to her by your commissioner, and your commissioner, therefore, asks that he be given authority to make a deed for the land, by inadvertance, not properly described in the complaint in this cause, and properly described in the contract filed therewith as an exhibit.

Respectfully submitted.

December 31, 1909.

J. L. McLeMORE

The Commissioner

Edwards
21 Rept of Census
June 10 1880

1910. Jan 10th
Jm

IN THE CIRCUIT COURT OF NANSEMOND COUNTY.

AMANDA EDWARDS

vs/

MATTIE E. JONES and others.

This cause came on this day to be again heard on the papers formerly read and on the report of Special Commissioner E. E. Holland, ^{filed January 10, 1900} to which report there is no exception and was argued by counsel.

On consideration whereof, it appearing from said report and from the contract between plaintiff and T. G. Jones, filed as an exhibit with the bill in this cause, that said plaintiff is entitled to a deed for a lot of land at Holland, Virginia, fronting fifty (50) feet on the Southern Railroad and running back therefrom two hundred and ten (210) feet, and that she has received a deed for a lot of land fifty (50) feet in width and one hundred and ten (110) feet deep, and the court, being of opinion that the said plaintiff is entitled to the lot of land purchased by her as described in the contract made between her and T. G. Jones, filed as an exhibit with the complainant's bill, doth adjudge, order and decree that E. E. Holland, who is hereby appointed a special commissioner for the purpose, shall make to the said Amanda Edwards a good and sufficient deed for a lot of land fifty (50) feet wide and one hundred (100) feet deep, lying just in the rear of the lot of land heretofore conveyed to her pursuant to a decree entered in this cause.

And this cause is continued.

Edward
y / Decree
James & Co.

July 10, 1869

I do hereby

Edwin L. Moore

Entered in Chancery
Order Book No. 4. Page 389.

We consent
Rt. W. Miller for depts.
E. E. Keane, for fees

IN THE CIRCUIT COURT OF THE COUNTY OF NANSEMOND.

AMANDA EDWARDS

vs.

MATTIE E. JONES, widow of T. G.
Jones, deceased, HENDRICKS T.
JONES, PEARL JONES and MARY
JONES, the 1st an infant under
the age of twenty-one years.

This cause came on this day to be heard on the bill of the complainant and the exhibits filed therewith, the answer of the adult defendants and the answer of R. W. Withers, duly appointed at Rules as guardian ad litem for the infant defendant, and of the said infant defendant, by the said R. W. Withers, her guardian ad litem, with replications thereto, and was argued by counsel.

On consideration whereof, the court being of opinion that the complainant is entitled to a deed for the lot of land mentioned in the bill, she having fully complied with the terms of a written contract therefor with T. G. Jones before his death, and having paid the purchase price of said lot of land in full, the court doth adjudge, order and decree that E. E. Holland, who is hereby appointed a special commissioner for that purpose, do make to the said Amanda Edwards, the complainant, a good and sufficient deed, conveying to her the said lot of land described in this cause.

And this cause is continued.

Amanda Edwards
vs Deeree
Matthe E. Jones & others

The consent to this
decree

Wm. H. Mithun p. d.

C. E. Hase and J. R.

Entered in Chancery Order
Book No. 4. Page 301.

Dec. 13th. 1909.

To be Entered.

James W. Somers.

In the circuit court of Nansemond County, Virginia.

Second September Rules, 1909.

Mattie E. Jones, Hendricks T. Jones, Pearl Jones
and Mary Jones an infant,-----Defendants

:
:
ads.:

Answer of Guardian ad litem.

:

Ananda Edwards-----Complainant.

The separate answer of Mary Jones an infant under the age of
twenty-one years, by Robt. W. Withers, her guardian ad litem,
assigned to defend her at rules, to a bill of complaint exhibited
against her and others, in the circuit court of Nansemond County
by Ananda Edwards.

The respondent, reserving to himself the benefit of all
just exceptions to the said bill for answer thereto, or to so
much thereof as she is advised that it is material she should an-
swer, by her guardian ad litem, answers and says:

That she is an infant of tender years, and by reason of her
infancy is incapable of understanding or of taking care of her
rights and interests. She therefore, by her guardian ad litem,
commends herself and her rights and interest to the protection of
the court and prays that no decree may be pronounced which will
tend to her prejudice, and having fully answered the said re-
spondant prays to be hence dismissed with her reasonable costs in
this behalf expended, and she will ever pray, etc.

Robt. W. Withers, p. d.

Mattie E. Jones
Hendricks T. Jones
Pearl Jones

By counsel

Robt. W. Withers guardian ad
litem for Mary Jones an
infant defendant

Amanda Edwards

re } in Chancery

Mattie C. Jones & als.

Answer of Guard. ad ltr
Filed *Wm. H. Jones & Co.*

In the circuit court of Nansemond County, Virginia

Second September Rules 1909.

Mattie E. Jones, Hendricks T. Jones, Pearl Jones
and Mary Jones, an infant,-----Defendants.

ads.

Answer

Ananda Edwards-----Complainant

The joint and separate answer of Mattie E. Jones, Hendricks T. Jones and Pearl Jones, the adult defendants to a bill of complaint exhibited against them and others in the circuit court of Nansemond County by Ananda Edwards, complainant.

These respondents reserving to themselves the benefit of all just exceptions to the said bill, for answer thereto, or to so much thereof as they are advised that it is material they should answer, answer and say that-

The material facts set forth in the bill are true and these respondents recognize the claims of the complainant to the land mentioned, but as it is true that these respondents have offered to execute a deed to the property conveying the same to the complainant as set forth in the bill, do not feel that they should be required to pay any of the costs of these proceedings.

Since the death of her father, T. G. Jones, the respondent Pearl Jones has sold and conveyed her individual interest in her father's estate to her brother Hendricks T. Jones, as appears of record in this court's clerk's office, and she has no interest in this matter and prays to be dismissed with her costs

The defendants Hendricks T. Jones and Mattie E. Jones, are ready and willing at any time to convey their interests in the land in these proceedings mentioned to the complainant. and having fully answered the complainant's bill, these respondents pray to be hence dismissed with their proper costs by them in this behalf expended and they will ever pray, etc.

Robt. N. Meems, p. d.

*Mattie E. Jones
Hendricks T. Jones
Pearl Jones
By counsel*

Amanda Edwards
re. } In Chancery
Mattie C. Jones & als.

Answer of admt depts.
Filed
Appomcy DC

TO THE HONORABLE JAMES L. McLEMORE, JUDGE OF THE CIRCUIT
COURT OF THE COUNTY OF NANSEMOND.

Your complainant, Amanda Edwards, respectfully complaining, shows unto the court the following case:

That on the 12th day of November, 1906, she entered into a contract with one T. G. Jones for the purchase of a certain lot of land at Holland, in Nansemond County, Virginia, a copy of which is herewith filed, marked exhibit "A".

That by said contract the said T. G. Jones agreed to sell to her a certain lot of land at Holland, in Nansemond County, fronting on the Southern Railway fifty (50) feet, running back therefrom one hundred and ten (110) feet, and bounded by the lands of Jane Scott, Bessie Lee and others, for the sum of One Hundred Dollars (\$100), and that she agreed to purchase the same and pay him therefor Twenty Dollars (\$20) in cash, and Fifteen Dollars (\$15) every three months thereafter until the whole purchase price was paid.

That pursuant to said contract, she was put in possession of said property and proceeded to improve the same by building a residence thereon, which she has since completed.

That she has paid to the said T. G. Jones the purchase price of said property with the accrued interest thereon, and files herewith receipts signed by T. G. Jones, marked exhibit "B", which show that she has paid the purchase price of said property in full.

That the said T. G. Jones has since departed this life leaving a widow, Mattie E. Jones, and three children, namely: Hendricks T. Jones, Pearl Jones and Mary Jones, as his only children and heirs at law. The said Mary Jones is an infant under the age of twenty-one years.

That the said T. G. Jones, when your complainant had paid him the purchase price in full, promised to make your complainant a deed for said property, but before doing so was killed. Since his death his widow and adult children have expressed their willingness to make to your complainant a deed

for their respective interests in said property, but your complainant is advised that she cannot get a good title to said property in this way, no one being authorized to convey the interest of the said infant as aforesaid.

Your complainant is advised and here alleges that, having paid the purchase price of said property in accordance with the terms of the original agreement, and having entered upon the property and made valuable improvements thereon, she is entitled to a deed therefor.

In tender consideration whereof and for as much as your complainant is remediless in the premises save in a court of equity where such matters are alone and properly cognizable, your complainant prays that the said Mattie E. Jones, Hendricks Jones, Pearl Jones and Mary Jones may be made parties defendant to this bill and required to answer the same, but answers under oath are waived; that a proper guardian ad litem be assigned the infant defendant to defend *her* interest in this suit, who shall also answer said bill; that proper process issue; that a commissioner be appointed by this court to make to your complainant a deed for the property above described, and that all such other, further and general relief may be afforded your complainant as the nature of her case may require or to equity shall seem meet.

And your complainant will ever pray, etc.

E. E. Hoggan,
A. P.

Amanda Edwards,
By Counsel

Amanda Edwards

is. 3 Bill.

Mattie E Jones & others