

1933-195

Nansemond County (Suffolk)

Chancery Causes: Thomas L. Woodward, assignee &c 223
vs

Agnes Williams &c

Watkins, Cook, Morris, T. E. Cook & Co J,
Skinner, Taylor

VIRGINIA,

IN THE CLERK'S OFFICE OF THE CIRCUIT COURT OF NANSE-
MOND COUNTY THE 27TH DAY OF FEBRUARY, 1933:

Thomas L. Woodward, Assignee of
M. Erskine Watkins, Trustee in Bank-
ruptcy of T. E. Cook and E. V. Morris,
partners trading as T. E. Cook and Com-
pany, Bankrupts.....Plaintiff

v.

Agnes Williams and the unknown heirs
of Phillip Williams, Deceased.....Defendants

The object of the above styled suit is to subject the
land of which Phillip H. Williams died seized and possessed to
the payment of his debts, particularly to the claim of complain-
ant, said real estate being bounded and described as follows,
to-wit:

All that certain tract, piece or parcel of land
with appurtenances thereon situate, lying and being
in Whaleyville Magisterial District, Nansemond County,
Virginia, lying on the East side of the Suffolk
Gatesville County road, bounded and described as
follows: Beginning at an iron stob, a corner on
Algier Hamlin; thence running Eastwardly along said
Hamlin's line 2594 feet to an iron stob a corner on
L. S. Savage; thence along said Savage line North-
east 462 feet to an iron stob a corner on Augustus
Vann; thence along said Vann's line Northwest 2616
feet to the said county road; thence along said
county road 460 feet to the place of beginning, and
containing 27 acres more or less and is the same
tract of land that was conveyed to Phillip Williams
by deed from A. W. Taylor and wife, said deed bearing
date on February 28, 1911, and duly recorded in the
Clerk's Office of the Circuit Court of Nansemond
County, Virginia, in Deed Book 70, Page 327.

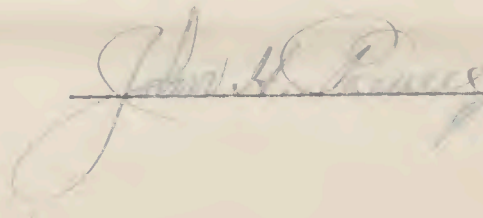
All that certain tract, piece or parcel of land with
appurtenances thereon situate, lying and being in
Whaleyville Magisterial District, Nansemond County,
Virginia, and bounded and described as follows: Be-
ginning at a point on the East side of the Gates-
ville road at a ditch, a corner with the G. W. Skin-
ner land; thence running South 86 degrees East a line
parallel to the line of Henry Riddick; on the East by
the land of O. P. Savage, deceased, South by the land
of Henry Riddick and West by the Gatesville road and
containing 25 acres more or less hereby conveyed in
the gross and not by the acre and is the same tract
or parcel of land the said Phillip Williams derived
title to from G. W. Skinner and Nancy J., his wife,

which said deed bears date on March 25, 1891, and is duly of record in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, in Deed Book 24, page 558.

And it appearing by affidavit filed according to law that Agnes Williams, the above named defendant, or any other heir of Phillip H. Williams, none being known, is not a resident of the State of Virginia, it is therefore ordered that the said Agnes Williams, or any other heir of the said Phillip H. Williams, do appear within ten days after publication of this order, in the Clerk's Office of the Circuit Court of Nansemond County and do what is necessary to protect their respective interests. It is further ordered that this order be published once a week for four successive weeks in the Suffolk News Herald, a newspaper printed in the City of Suffolk and having general circulation in Nansemond County no newspaper being prescribed by our said court the newspaper hereby directed. It is further ordered that a copy of this order be posted at the front door of the Courthouse of the Circuit Court of Nansemond County on or before the next succeeding rule day and that another copy of this order be mailed to each defendant to the Post Office address given in the affidavit.


CLERK OF THE CIRCUIT COURT OF
NANSEMOND COUNTY.

A true copy--Teste:


Clerk.

VIRGINIA,

IN THE CIRCUIT COURT OF NANSEMOND COUNTY:

Thomas L. Woodward, Assignee of
M. Erskine Watkins, Trustee in Bank-
ruptcy of T. E. Cook and E. V. Morris,
partners trading as T. E. Cook and Com-
pany, Bankrupt.....Plaintiff

v,

Agnes Williams and the unknown heirs
of Phillip Williams, Deceased.....Defendants

STATE OF VIRGINIA,
CITY OF SUFFOLK, to-wit:

This day the above named plaintiff personally appeared
before me, Ruth E. Peele, a Notary Public in and for the city
aforesaid, in the State of Virginia, and made oath that Agnes
Williams is not a resident of the State of Virginia and that
her last known Post Office address is 445 Putnam Avenue, Brook-
lyn, New York.

Given under my hand this 27th day of February, 1933.

Ruth E. Peele
Notary Public.

My commission expires:
September 3, 1934.

VIRGINIA,

IN THE CIRCUIT COURT OF NAN-
SEMOND COUNTY

Thomas L. Woodward, Assignee
of M. Erskine Watkins, Trus-
tee in Bankruptcy of T. E.
Cook and E. V. Morris, part-
ners trading as T. E. Cook &
Company, Bankrupt...Plaintiff

v.

Agnes Williams and the unknown
heirs of Phillip Williams, De-
ceased.....Defendants

*Filed 3/1/33
John H. Howell - clk*

VIRGINIA:

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

Thomas L. Woodward, *Assignee*
Pltff.

vs.

Agnes Williams and The
Unknown heirs of Philip Williams
Df't

In Chancery

I hereby certify that on the 3rd day of March 1933

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 3rd day of March 1933,
John H. H. H., Clerk.

By _____, Deputy Clerk.

KNOW ALL MEN THAT I, Thomas L. Woodward, Assignee of M. Erskine Watkins, Trustee in Bankruptcy of T. E. Cook and E. V. Morris, Trading as T. E. Cook and Company, Bankrupt, plaintiff in the hereinafter styled cause, do give notice of lis pendens by this memorandum filed in the Clerk's Office of the Circuit Court of Nansemond County, on the 22nd day of November, 1932, which sets forth as follows: There is now pending in the Circuit Court of Nansemond County a certain cause, the title of which is Thomas L. Woodward, Assignee of M. Erskine Watkins, Trustee in Bankruptcy of T. E. Cook and E. V. Morris, Trading as T. E. Cook and Company, Bankrupt, against Agnes Williams and the unknown heirs of Phillip Williams, deceased; the general object thereof is to subject the land of which Phillip H. Williams died seized and possessed to the payment of a certain debt due by the said Phillip H. Williams and Agnes Williams to the plaintiff in the sum of \$242.50, with legal interest thereon from May 10, 1930, until paid; the description of the land affected thereby is as follows:

"All that certain tract, piece or parcel of land with appurtenances thereon situate, lying and being in Whaleyville Magisterial District, Nansemond County, Virginia, lying on the East side of the Suffolk Gatesville County road, bounded and described as follows: Beginning at an iron stob, a corner on Algier Hamlin; thence running Eastwardly along said Hamlin's line 2594 feet to an iron stob a corner on L. S. Savage; thence along said Savage line North-east 462 feet to an iron stob a corner on Augustus Vann; thence along said Vann's line Northwest 2616 feet to the said county road; thence along said county road 460 feet to the place of beginning, and containing 27 acres more or less and is the same tract of land that was conveyed to Phillip Williams by deed from A. W. Taylor and wife, said deed bearing date on February 28, 1911, and duly recorded in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, in Deed Book 70, page 327."

"All that certain tract, piece or parcel of land with appurtenances thereon situate, lying and being in Whaleyville Magisterial District, Nansemond County Virginia, and bounded and described as follows: Beginning at a point on the East side of the Gatesville road at a ditch, a corner with the G. W. Skinner land; thence running South 86 degrees East a line parallel to the line of Henry Riddick; on the East by the land of O. P. Savage, deceased, South by the land of Henry Riddick and West by the Gatesville road and containing twenty-five (25) acres more or less hereby conveyed in the gross and not by the acre and is the same tract or parcel of land the said Phillip Williams derived title to from G. W. Skinner and Nancy J., his wife, which said deed bears date on March 25, 1891, and is duly of record in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, in Deed Book 24, Page 558."

The names of the persons whose estates are intended to be affected thereby are Phillip H. Williams,,deceased, and his heirs, if any, which are unknown to plaintiff, and Agnes Williams.

Witness my hand this 22nd day of November, 1932.

Thomas L. Woodward,
Assignee of M. Erskine Watkins, Trustee in
Bankruptcy of J. E. Cook and E. V. Morris, trading
as J. E. Cook and Company

STATE OF VIRGINIA,
CITY OF SUFFOLK, to-wit:

I, Ruth E. Peele, a Notary Public in and for the city aforesaid, in the State of Virginia, do certify that Thomas L. Woodward, Assignee of M. Erskine Watkins, Trustee in Bankruptcy of T. E. Cook and E. V. Morris, Trading as T. E. Cook & Company, Bankrupt, whose name is signed to the writing above, bearing date on the 22nd day of November, 1932, has acknowledged the same before me in my city aforesaid.

My commission expires September 3rd, 1934.

Given under my hand this 22nd day of November, 1932.

Ruth E. Peele
Notary Public.

I, John H. Powell, Clerk of the Circuit Court of Nansemond County, in which the above mentioned cause of Thomas L. Woodward, Assignee of M. Erskine Watkins, Trustee in Bankruptcy of T. E. Cook and E. V. Morris, Trading as T. E. Cook & Company, Bankrupt, against Agnes Williams and the unknown heirs of Phillip H. Williams is pending do hereby authenticate the above memorandum according to the provisions of section 6469 of the Code of Virginia and declare that the facts stated in said memorandum are correct, as shown by the record in the said cause.

John H. Powell
CLERK OF THE CIRCUIT COURT OF NAN-
SEMOND COUNTY.

VIRGINIA:

In the Clerk's Office of the Circuit Court
of Nansemond County the 30 day of November 1932

Sir Penning
This ~~case~~ was presented, and, with the certificate
annexed, admitted to record at 11:45 A.M.

Teste John H. Powell Clerk

By M. K. Gadsden D. C.

INDEXED
VIRGINIA,
IN THE CIRCUIT COURT OF NAN-
SEMOND COUNTY

Thomas L. Woodward, Assig-
nee of M. Erskine Watkins,
Trustee in Bankruptcy of T.
E. Cook and E. V. Morris,
Trading as T. E. Cook & Co.,
Bankrupt

v.

Agnes Williams and the un-
known heirs of Phillip H.
Williams, deceased

NOTICE OF LIS PENDENS

*Admitted to record
this 30 day of
November 1932
See Deed Book
No 126 Page 307*

Filed 11-30-32
John W. Parnell Clerk
By Evelyn Harris
HOLLAND & WOODWARD

ATTORNEYS AND COUNSELLORS AT LAW

SUITE 301-307 NATIONAL BANK OF SUFFOLK BUILDING

SUFFOLK, VIRGINIA

VIRGINIA,

IN THE CLERK'S OFFICE OF THE CIRCUIT COURT OF NANSE-
MOND COUNTY THE 27TH DAY OF FEBRUARY, 1933:

Thomas L. Woodward, Assignee of
M. Erskine Watkins, Trustee in Bank-
ruptcy of T. E. Cook and E. V. Morris,
partners trading as T. E. Cook and Com-
pany, Bankrupt.....Plaintiff

v.

Agnes Williams and the unknown heirs
of Phillip Williams, Deceased.....Defendants

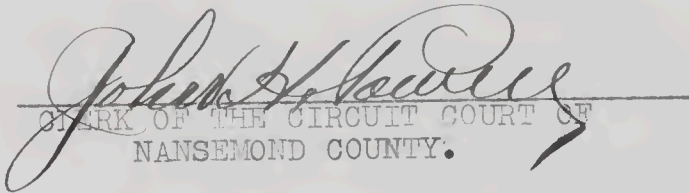
The object of the above styled suit is to subject the
land of which Phillip H. Williams died seized and possessed to
the payment of his debts, particularly to the claim of complain-
ant, said real estate being bounded and described as follows,
to-wit:

All that certain tract, piece or parcel of land
with appurtenances thereon situate, lying and being
in Whaleyville Magisterial District, Nansemond Coun-
ty, Virginia, lying on the East side of the Suffolk
Gatesville County road, bounded and described as
follows: Beginning at an iron stob, a corner on
Algier Hamlin; thence running Eastwardly along said
Hamlin's line 2594 feet to an iron stob a corner on
L. S. Savage; thence along said Savage line North-
east 462 feet to an iron stob a corner on Augustus
Vann; thence along said Vann's line Northwest 2616
feet to the said county road; thence along said
county road 460 to the place of beginning, and con-
taining 27 acres more or less and is the same tract
of land that was conveyed to Phillip Williams by
deed from A. W. Taylor and wife, said deed bearing
date on February 28, 1911, and duly recorded in the
Clerk's Office of the Circuit Court of Nansemond
County, Virginia, in Deed Book 70, Page 327."

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appurtenances thereon situate, lying and being in
Whaleyville Magisterial District, Nansemond County,
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Beginning at a point on the East side of the Gates-
ville road at a ditch, a corner with the G. W. Skin-
ner land; thence running South 86 degrees East a line
parallel to the line of Henry Riddick; on the East by
the land of O. P. Savage, deceased, South by the land
of Henry Riddick and West by the Gatesville road and
containing 25 acres more or less hereby conveyed in
the gross and not by the acre and is the same tract
or parcel of land the said Phillip Williams derived
title to from G. W. Skinner and Nancy J., his wife,

which said deed bears date on March 25, 1891, and is duly of record in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, in Deed Book 24, Page 558.

And it appearing by affidavit filed according to law that Agnes Williams, the above named defendant, or any other heir of Phillip H. Williams, none being known, is not a resident of the State of Virginia, it is therefore ordered that the said Agnes Williams, or any other heir of the said Phillip H. Williams, do appear within ten days after publication of this order, in the Clerk's Office of the Circuit Court of Nansemond County and do what is necessary to protect their respective interests. It is further ordered that this order be published once a week for four successive weeks in the Suffolk News Herald, a newspaper printed in the City of Suffolk and having general circulation in Nansemond County no newspaper being prescribed by our said court the newspaper hereby directed. It is further ordered that a copy of this order be posted at the front door of the Courthouse of the Circuit Court of Nansemond County on or before the next succeeding rule day and that another copy of this order be mailed to each defendant to the Post Office address given in the affidavit.


CLERK OF THE CIRCUIT COURT OF
NANSEMOND COUNTY.

VIRGINIA,

IN THE CIRCUIT COURT OF NAN-
SEMOND COUNTY

Thomas L. Woodward, Assignee of
M.^r Erskine Watkins, Trustee in
Bankruptcy of T. E. Cook and E.
V. Morris, partners, trading as
T. E. Cook & Company, Bankrupt
Plaintiff

v. ORDER OF PUBLICATION

Agnes Williams and the unknown
heirs of Phillip Williams, De-
ceased Defendants

*Filed 3/1/33
John H. Towell Clerk*

The Commonwealth of Virginia,

To the Sheriff of the County of Nassau, Greeting:

WE COMMAND YOU, That you summon Agnes Williams and the unknown heirs
of Phillip H. Williams, Deceased.

to appear at the Clerk's office of the Circuit Court of the County of Nassau
at the rules to be held for the said Court on the first Monday in December, 1932,
to answer a bill in chancery, exhibited against them in our said Court by
Thomas L. Woodward, Assignee of M. Erskine Watkins, Trustee in
Bankruptcy of T. E. Cook and E. V. Morris, Trading as T. E. Cook
& Company, Bankrupt.

And have then there this writ. Witness John H. Powell, Clerk of our said
Court, at the court-house, the 1st day of December, 1932, and in the
157th year of the Commonwealth.

John H. Powell, Clerk.

By Euelyn Harris D. C.

Form No. 300

COPY:

vs. } SUBPOENA IN CHANCERY

, p.q.

To.....Rules,

.....Circuit Court.

The Commonwealth of Virginia,

To the Sheriff of the County of Nansemond, Greeting:

WE COMMAND YOU, That you summon Agnes Williams and the unknown heirs
of Phillip H. Williams, Deceased.

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 December, 1932,
to answer a bill in chancery, exhibited against them in our said Court by
Thomas L. Woodward, Assignee of M. Erskine Watkins, Trustee in
Bankruptcy of T. E. Cook and E. V. Morris, Trading as T. E. Cook
& Company, Bankrupt.

And have then there this writ. Witness John H. Powell, Clerk of our said
Court, at the court-house, the 1st day of December, 1932, and in the
157th year of the Commonwealth.

John H. Powell, Clerk.

By Evelyn Harris D. C.

ORIGINAL

vs. } SUBPOENA IN CHANCERY

J L Woodward, p.q.

To.....Rules,

.....Circuit Court.

50 c pf

Not found in
my County of
Hansemond
E B Rawle
Shuff

VIRGINIA,

IN THE CIRCUIT COURT OF NANSEMOND COUNTY:

Thomas L. Woodward, Assignee of M. Erskine
Watkins, Trustee in Bankruptcy of T. E.
Cook and E. V. Morris, Trading as T. E.
Cook & Company, Bankrupt.....Complainant

v.

Agnes Williams and the unknown heirs of
Phillip H. Williams, Deceased.....Defendants

TO THE CLERK OF THE CIRCUIT COURT OF NANSEMOND COUNTY:

Please issue summons in chancery against the above parties
returnable to first December, 1932, rules.

Thomas L. Woodward

VIRGINIA,
IN THE CIRCUIT COURT OF NAN-
SEMOND COUNTY.

Thomas L. Woodward, Assignee
of M. Erskine Watkins, Trus-
tee in Bankruptcy of T. E.
Cook and E. V. Morris, Trad-
ing as T. E. Cook & Co., Bank
rupt

v.

Agnes Williams and the unknown
heirs of Phillip H. Williams
deceased.

*Filed this the
30th day of
November, 1932.*

*John H. Powell, Clerk
By Evelyn Hossie, D.C.*

HOLLAND & WOODWARD

ATTORNEYS AND COUNSELLORS AT LAW

SUITE 301-307 NATIONAL BANK OF SUFFOLK BUILDING

SUFFOLK, VIRGINIA

Deposit of \$11.50

VIRGINIA,

IN THE CIRCUIT COURT OF NANSEMOND COUNTY:

Thomas L. Woodward, Assignee of M. Erskine
Watkins, Trustee in Bankruptcy of T. E.
Cook and E. V. Morris, Trading as T. E.
Cook & Company, Bankrupt.....Complainant

v. IN CHANCERY

Agnes Williams and the unknown heirs
of Phillip H. Williams, Deceased.....Defendants

This cause came on this day to be heard upon complain-
ant's oral motion to dismiss this suit, he having acknowledged
satisfaction of his claim.

Upon consideration whereof, the Court doth order, ad-
judge and decree that said cause be dismissed and stricken
from the docket.

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VIRGINIA,
IN THE CIRCUIT COURT OF
NANSEMOND COUNTY.

Thomas L. Woodward, Assignee
of M. Erskine Watkins, Trustee
in Bankruptcy of T. E. Cook
and E. V. Morris, Trading as
T. E. Cook & Company, Bankrupt
Complainant

v.

Agnes Williams and the unknown
heirs of Phillip H. Williams,
Deceased Defendant

Enter this 21 day of March, 1933

W. L. McQuinn
Judge.

VIRGINIA,

IN THE CIRCUIT COURT OF NANSEMOND COUNTY:

Thomas L. Woodward, Assignee of
M. Erskine Watkins, Trustee in Bank-
ruptcy of T. E. Cook and E. V. Morris,
Partners trading as T. E. Cook & Com-
pany, Bankrupt.....Plaintiff

v.

Agnes Williams and the unknown heirs
of Phillip Williams, Deceased.....Defendants

TO THE HONORABLE CIRCUIT COURT OF NANSEMOND COUNTY:

Your complainant, Thomas L. Woodward, Assignee of M. Erskine Watkins, Trustee in Bankruptcy of T. E. Cook and E. V. Morris, partners trading as T. E. Cook and Company, Bankrupt, respectfully represents:

(1) That Phillip Williams, also known as Phillip H. Williams, and P. H. Williams, on the 10th day of *May 1928* died intestate leaving, so far as your complainant is advised and believes, only one known heir or distributee, namely Agnes Williams, his wife; that so far as your complainant is advised and believes the said Phillip Williams had no living kin.

(2) That upon the death of the said Phillip Williams, T. E. Cook and Company, funeral directors, furnished the services and material necessary to the conduct of the funeral and burial of the said Phillip Williams, in the sum of \$242.50, at the specific direction and request of Agnes Williams, his wife, it being then and there understood and agreed that the estate of Phillip Williams would be responsible therefor.

(3) That your complainant is the assignee of M. Erskine Watkins, Trustee in Bankruptcy of T. E. Cook and E. V. Morris, partners trading as T. E. Cook and Company who since the afore-

said funeral filed voluntary petition in bankruptcy and were adjudicated bankrupts by the District Court of the United States for the Eastern District of Virginia, and M. Erskine Watkins appointed Trustee therefor.

(4) Your complainant further represents that the said Agnes Williams, shortly after the death of Phillip H. Williams, sold and conveyed all of the property, other than real estate, of which the said Phillip H. Williams died seized and possessed, appropriated the proceeds therefrom to her own use and at once moved to 445 Putnam Avenue, New York City; that there is not now available for creditors of the estate of Phillip H. Williams any personal property or money of any character or description for the payment of his debt or debts, of which your complainant is not advised of the existence of any other than the obligation hereinabove set forth.

(5) That at the time of the death of Phillip H. Williams he was seized and possessed of the following property, to-wit:

"All that certain tract, piece or parcel of land with appurtenances thereon situate, lying and being in Whaleyville Magisterial District, Nansemond County, Virginia, lying on the East side of the Suffolk Gatesville County road, bounded and described as follows: Beginning at an iron stob, a corner on Algier Hamlin; thence running Eastwardly along said Hamlin's line 2594 feet to an iron stob a corner on L. S. Savage; thence along said Savage line Northeast 462 feet to an iron stob a corner on Augustus Vann; thence along said Vann's line Northwest 2616 feet to the said county road; thence along said county road 460 feet to the place of beginning, and containing 27 acres more or less and is the same tract of land that was conveyed to Phillip Williams by deed from A. W. Taylor and wife, said deed bearing date on February 28, 1911, and duly recorded in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, in Deed Book 70, page 327."

"All that certain tract, piece or parcel of land with appurtenances thereon situate, lying and being in Whaleyville Magisterial District, Nansemond County, Virginia, and bounded and described as follows: Beginning at a point on the East side of the Gatesville road at a ditch, a corner with the G. W. Skinner land; thence running South 86 degrees East a line parallel to the line of Henry Riddick; on the East by the land of O. P. Savage, deceased, South by the land of Henry Riddick and West by the Gatesville road and containing 25 acres more or less

hereby conveyed in the gross and not by the acre and is the same tract or parcel of land the said Phillip Williams derived title to from G. W. Skinner and Nancy J., his wife, which said deed bears date on March 25, 1891, and is duly of record in the Clerk's Office of the Circuit Court of Nansemond County, Virginia, in Deed Book 24, Page 558."

of the approximate value of ONE THOUSAND (\$1,000.00) DOLLARS.

In consideration whereof and forasmuch as your complainant is without remedy save in a court of equity, where matters of this kind are only and properly cognizable, your complainant prays: that the said Agnes Williams be made a party defendant to this suit; that an order of publication issue requiring the said Agnes Williams and all of the unknown heirs, if any, to appear and show cause, if any they have, why the real estate set forth aforesaid shall not be subjected to the payment of the debts of Phillip H. Williams, and assert their rights herein; that proper process issue; that an account of all debts and liabilities of the estate of the said Phillip H. Williams be taken, and their priorities ascertained and determined; that the amount and value of the real estate owned by the said Phillip H. Williams at the time of his death also be ascertained and determined; that the real estate of the said Phillip H. Williams be subjected to the payment of his debts, particularly that due your complainant; that the same be sold and applied to the payment of the debts of Phillip H. Williams in direct order of their priorities; and that all such other accounts and orders, which are proper, be taken and made in this cause; that reasonable counsel fees be allowed your complainant for bringing and maintaining this action; and that your complainant may have such other, further and general relief as to equity shall seem meet, or the nature of this case require, in order to afford your complainant--and such other persons as may file their petition herein and be made parties hereto--complete relief.

And your complainant will ever pray, etc.


Assignee of M. Erskine Watkins, Trustee in Bankruptcy of T. E. Cook and E. V. Morris, partners trading as T. E. Cook & Company, Bankrupt.

STATE OF VIRGINIA,

CITY OF SUFFOLK, to-wit:

I, Ruth E. Peele, a Notary Public for the City of Suffolk, Virginia, do certify that Thomas L. Woodward personally appeared before me in my city aforesaid, who being duly sworn says that the matters and things stated in the foregoing bill of complaint are true to the best of his knowledge and belief, except as to those matters and things stated on information and belief and as to those he believes them to be true.

Given under my hand this day of March, 1933.

My commission expires September 3, 1934.

Ruth E. Peele
Notary Public.

VIRGINIA,
IN THE CIRCUIT COURT OF
HANOVER COUNTY:

Thos. L. Woodward, Assignee

v. BILL OF COMPLAINT

Agnes Williams, and others

IN CHANCERY.

*Received 3/1/32
and filed 3/6/33.
John H. Howard - Clerk*

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