

To the Honorable John A. Meredith Judge of  
the Circuit Court of the City of Richmond -

Humbly Complaining sheweth unto your  
Honor your Orator R. St. Catlett administrator de  
bonis non with the will annexed of Charles  
Mane deceased, that in the year 1859. the said  
Charles Mane departed this life, having previously  
made and published his last will and testament,  
which was admitted to probat and record in the  
County Court of Chesterfield County on the 13<sup>th</sup> Decem.  
1859 - A copy of the said will is herewith exhibited  
marked "A." and prayed to be taken as a part of  
this bill.

On the said 13<sup>th</sup> of Decem 1859. C. W. Purcell,  
R. M. Burton and Samuel C. Greenhow, the executors  
named in the said will, qualified as such, and  
continued to act till the day of 1867  
when their powers were revoked, and your orator  
was appointed admer: d. b. n. c. t. a. as appears from  
a copy of the Court's order herewith filed marked  
"B." and prayed to be taken as a part of this bill.  
The 2<sup>nd</sup> article of said will is in these words:

"I wish my Executors hereafter named to purchase  
"at the sale of Samuel Mane Exor: the boy that  
"is now waiting on me Edmund Dixon, belonging to  
"said Estate, and set him free, and to give him  
"from my estate the sum of two thousand dollars  
"when he leaves the State".

The Executors did purchase the boy Edmund Dixon,  
and did set him free, but did not give him the

two thousand dollars mentioned in said will, nor has your orator paid to the said Edmund Dixon the said two thousand dollars.

Your orator charges that the said Edmund Dixon has never left the state of Virginia, but has continued to reside in, and still resides in the city of Richmond in the state of Virginia.

The 4<sup>th</sup> article of said will is in these words -

"The Balance of my estate both real and personal

"I wish sold and equally divided between my sisters'

"M. Carbine Barton's Children."

The said residuary legatees are Joseph M. Barton, William Barton and Baldwin the wife of Robert F. Baldwin

These residuary legatees insist that the said Edmund Dixon is not entitled to the legacy of two thousand dollars, and insist that your orator shall not pay it to him.

Your orator is therefore at a loss to know what to do in the premises, and he is advised that he is entitled to the instruction of this Honorable Court, and to have the said will construed by your Honor.

In consideration of the premises your orator prays that the said Edmund Dixon (a free man of color) Joseph M. Barton, William Barton and Robert F. Baldwin and Baldwin his wife, may be made parties defendants hereto, and be required to answer this bill - That the said Edmund Dixon may be required, <sup>either</sup> to assert or <sup>to</sup> relinquish his claim to the said legacy, and, in the event of his asserting a claim to said legacy, that your

honor will construe the said will, and decide what  
is the <sup>true</sup> interpretation of the same as to said legacy,  
and whether or not the said Edmund Nixon is  
entitled to have the said two thousand dollars paid  
to him out of the estate of Charles Marx deceased.  
And that your honor will grant such other and  
general relief in the premises as the nature of the  
case may require: And your orator will ever  
pray &c.

J. J. Evans, p. g.

4.

CD 86,  
E. F. 17.  
Marx's admor.

v. } Bill-

Dixon to them.

1868

Sept. R. Bill filed S.D.N.

1<sup>st</sup> Oct. R. Bill pro confes

2<sup>nd</sup> " " Cause set for hearing