

State of South Carolina, )  
 : In Common Pleas. - Complaint.  
 County of Greenville. )

Mary B. Lewis,  
 Plaintiff,

-against-

Taylor McBee, Joe G. McBee,  
 W.B. McBee, S.L. McBee,  
 Sarah Beck, Eltinge McBee,  
 Lucy Grottier, Julia Mintram,  
 and Hattie McBee, and the heirs at  
 law of Joe G. McBee, if any, not above  
 named, and L.B. Houston, as Committee for the  
 Estate of the Defendant Taylor McBee.  
 Defendants.

The complaint of the above named plaintiff respectively shows to the Court:

1. That on the day of , 1913, the defendants Taylor McBee and Joe G. McBee, for valuable consideration, conveyed in fee simple from all encumbrance to the plaintiff Mary B. Lewis, that certain tract of land situate in the State and County aforesaid and near the City of Greenville, containing 29-6/10 acres, more or less, described as follows: Beginning at a Pine stump on the west side of Brushy Creek, and runs thence N. 92 E. 9.25 to 3Xom; thence N. 52 E. 19.50 to an iron pin; thence S. 71-1/2 E. 9.75 to an iron pin; thence S. 71-1/2 E. 10.39 to an iron pin; thence S. 72-1/2 W. 7.57 to a stake; thence S. 68-1/2 W. crossing Brushy Creek 32.50 to the beginning corner; that said description is in accordance with plat of W.A. Adams, January 11, 1913, on which plat there is among other things a notation that the survey was made at the request of Joe McBee and J.O. Lewis, the said Joe McBee being one of the defendants and the said J.O. Lewis, being the husband of the plaintiff and represented her in the above stated purchase and sale.
2. That the deed to said land was executed and delivered in accordance with the laws of the State of South Carolina, but has been lost or mislaid without having been recorded, and it is the desire of the plaintiff herein, as an interested party, to preserve the contents of said deed, perpetuate the testimony as to its execution and delivery and to establish title to the above described land.
3. That after the execution and delivery of said deed as aforesaid, the plaintiff went into immediate possession thereof, is now in possession of a part thereof, and has by warranty deed conveyed away a portion thereof with the understanding that the relief hereinafter prayed for would be obtained in this Court.
4. Not long after the execution and delivery of said deed, the defendants Taylor McBee and Joe G. McBee removed from this State and are not now residents thereof; that plaintiff is informed and believes that the defendant Taylor McBee is a resident somewhere in the State of Virginia, his Post Office address not known to her, and the defendant Joe G. McBee as plaintiff is informed and believes has not been heard from by members of his family or relatives since his departure from this State, and he is reported to have died; that so far as plaintiff is informed and believes neither of those two defendants were ever married.
5. That if the said Joe G. McBee is deceased, his only heirs at law and distributees are his brothers W.B. McBee, who is a nonresident of this State, S.L. McBee, of said County and State, and Mrs. Sarah Beck of the State of New York, who is his only sister. That E.A. McBee, a predeceased prother departed this life in 1914, leaving him surviving as his heirs at law and distributees, the defendants Eltinge McBee, his widow, and his daughters, Lucy Grottier and Julia Mintram, the last being non-residents of this State and Hattie McBee; that all of the parties above mentioned are over the age of 21 years.
6. Plaintiff alleges on information and belief that the defendant L.B. Houston has heretofore been appointed Committee for the Estate of the defendant Taylor McBee and is now acting as such. where- Plaintiff prays that the contents of said deed may be established; the evidence of its execution and delivery be preserved, and that it be decreed that the plaintiff was seized in fee simple of said land, and for such other and further relief as to the Court may seem meet and proper.

State of South Carolina, )  
 County of Greenville. )

Mary B. Lewis,  
 Plaintiff,

-against- McBee, S.L. McBee )

Taylor McBee, Joe G. McBee, W.B. )  
 Sarah Beck, Eltinge McBee, )  
 Lucy Grottier, Julia Mintram, )  
 Hattie McBee, and the heirs at )  
 law of Joe G. McBee, if any not )  
 above named and L.B. Houston, as )  
 Committee for the Estate of )  
 Taylor McBee. )  
 Defendants. )

To the defendants above named:  
 You are hereby summoned and required to answer the complaint in this action; of which a copy is herewith served upon you and to serve a copy of your answer to the said complaint on the subscriber at his office, Greenville, S.C., within twenty days after the service hereof, exclusive of the day of such service; and if you fail to answer the complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for relief demanded in the complaint.  
 Dated March 13th, 1919  
 Harry A. Dargan.  
 C.C.C.P.

B.A. Morgan,  
 Plaintiff's Attorney.

Court of Common Pleas.

(Summons for Relief)  
 Complaint Served.

B.A. Morgan,  
 Plaintiff's Attorney.

State of South Carolina, )  
 County of Greenville. ) In Common Pleas.

Mary B. Lewis,  
 Plaintiff,

-against-

Taylor McBee, Joe G. McBee,  
 W.B. McBee, S.L. McBee, Sarah Beck,  
 Eltinge McBee, Lucy Grottier,  
 Julia Mintram, Hattie McBee, the  
 heirs at law of Joe G. McBee, if any, not above:  
 named, and L.B. Houston as Committee for the )  
 Estate of the defendant Taylor McBee, )  
 Defendants. )

- Answer-

- The defendant L.B. Houston answering the complaint herein respectfully shows:
1. That on the day of , 1917, this defendant was duly appointed Committee for the person and estate of the defendant Taylor McBee, who had been adjudged insane and committed to the State Hospital at Columbia.
  2. Defendant is informed and believes that the said McBee left said hospital a number of months ago and more than three months ago, has never returned or been returned thereto, and is still at large; that he is informed and believes said McBee has since been living in the States of Georgia, Virginia and North Carolina; that he has visited in the State of South Carolina.
  3. This defendant alleges that he has not knowledge or information as to the verity of the allegations of the Complaint but submits the rights of the said McBee to the care and protection of this Court.

L.B. Houston,  
 As Committee.

Answer of Defendant - Sarah Beck.

- The defendant, Sarah Beck, answering the Complaint herein, alleges:
1. That she admits paragraph five of the Complaint, but she has not knowledge or information sufficient to form a belief as to the truth of the other allegations contained in the Complaint, and she demands strict proof of the same.
  2. That she is the owner of various mortgages given by Taylor McBee and Joe G. McBee, covering certain property owned by them, but she has not sufficient information as to whether or not these various mortgages cover the land mentioned and described in paragraph one of the Complaint, and she ask that this question be investigated and determined in this action.
- Wherefore, this defendant demands such relief as she may be entitled to in this case

Oscar Hodges,  
 Attorney for Defendant, Sarah Beck.

April 11th, 1919.

State of South Carolina, :  
 County of Greenville. :

Mary B. Lewis, )  
 Plaintiff, )

-Vs-

Taylor McBee, et al. )  
 Defendants. )

Pursuant to an order of the Court in the above entitled case a Reference was held before me this 11th, day of June, 1919, and the following testimony was taken by Mrs. Cates in shorthand.  
 Appearances: B.A. Morgan Esq., Attorney for Plaintiff;  
 Oscar Hodges, Esq., for the defendant Sarah Beck - L.B. Houston, Committee, answered, no others have answered.  
 Mr. Morgan offers in evidence a survey and plat made by W.A. Adams, Surveyor on January 1, 1913, Marked Ex.1.  
 R.L. Cruikshanks being duly sworn says:  
 Q. Mr. Cruikshanks, what business were you in, in 1913,  
 A. Real Estate.  
 Q. Who was your partner,  
 A. J.H. Allen.  
 Q. Do you know Joe G. and Taylor McBee,  
 A. Yes.  
 Q. Were you employed as agent to sell this land,  
 A. Mr. McBee came and gave me this certain tract of land on Augusta Road - lying back from Augusta Road consisting of some two or three hundred acres - to sell for them - there was one part that joined the Lewis' on the back which lead out on a Creek. I interested Mr. Lewis in this particular piece of land and Allen and I took him out in a car to look over the place - he showed us what part he wanted and then took Mr. Adams - - -  
 Q. Who is Mr. Adams,  
 A. A surveyor. When it was surveyed it was 29 A. and Mr. Lewis took this piece of land and closed up sale. When the deed was made he paid in cash - he paid \$100.00 per acre - \$2960.00 the deed was delivered to him and I know he gave check.  
 Q. Did you see the deed,  
 A. Yes, I saw it - we witnessed a good many deeds but I cant swear that we witnessed this one but I saw it and know it was properly executed.  
 Q. That deed conveyed land described in this plat,  
 A. Yes.  
 Q. The deed was properly executed and delivered to Mr. Lewis for his wife Mary Lewis,  
 A. Yes.