

State of South Carolina }
 County of Greenville }

Ex Parte }
 John D. Sullivan }
 Petitioner }

Personally appeared before me J. S. Cothran who being duly sworn deposes and says, that he was one of the attorneys for one Newlets Sullivan of Greenville

County in the case of Newlets Sullivan against R. C. McNeely and James McNeely, a suit for the possession of so much of the lands in Greenville of what is known as Fountain Inn on the McNeely place, said lands being then in the possession of the said McNeelys, and containing about three hundred acres. That upon the last trial of said cause this deponent as the attorney for said had in his possession the deed from the then Sheriff of Greenville County, J. L. Southern to one Newlets Sullivan, the plaintiff in said cause and that after the said case was finally disposed of this deponent kept the said deed and had it in his possession until some time since when he has either lost or mislaid it, that said deed has never been recorded and this deponent thought he still had the deed until some month or more since when discovered after making diligent search that he has either lost or mislaid the same.

Sworn to and subscribed before me March 18th 1885
 P. M. Minniss }
 Clk. C. C. P. } J. S. Cothran

John D. Sullivan, Plaintiff } State of South Carolina
 Against } Greenville County
 Fannie A. Goodgion, Defendant }

To the Defendant, Fannie A. Goodgion, 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, Public Square 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 the relief demanded in the complaint.

Dated April 21st A. D. 1885
 A. J. Mosely }
 C. C. P. }

M. S. Ansel
 Plaintiff's Attorney

I acknowledge the due and personal service of copy of the within summons & complaint on me and hereby consent that the case be heard at once and at Chambers and I waive the time allowed to answer the complaint.

This April 28th 1885 } signed 25th April, }
 John D. Sullivan, Plaintiff } P. A. Goodgion
 Against } In Com. Pleas.
 Fannie A. Goodgion, Defendant } State of South Carolina
 County of Greenville.

On reading the pleading herein and the written consent of the Defendant that this case may be heard at once and at Chambers - now on motion of M. S. Ansel Attorney for Plaintiff ordered that it be referred to the Master for Greenville County to take testimony and report upon the truth of the allegations of the Complaint.

May 20th 1885 }
 John D. Sullivan, Plaintiff } In Common Pleas.
 - Against - } State of South Carolina
 Fannie A. Goodgion, Defendant } County of Greenville.

A reference was held in the above stated case on the 11th day of June 1885. M. S. Ansel Esq. appeared for the Plaintiff and the following testimony was taken. The sale book of Sheriff Southern was put in evidence from which it appears at page 310, that a tract of land containing 510 acres, more or less, bounded by lands of M. M. Jones, H. W. Stewart, R. H. Hunter and others was levied on by J. L. Southern Sheriff of Greenville County on the 10th March 1875 as the property of William McNeely at the suit of John L. Farrar and others and that the same was sold by the said Sheriff on May 3rd 1875 that the same was bid off by Newlets Sullivan for the sum of \$500. The affidavit of the Hon. J. S. Cothran attached to the complaint is also put in evidence which shows that he was one of the attorneys for the said Sullivan in the case aforesaid.