

RAPPAHANNOCK COUNTY

NAME OF ~~OWNER~~ --- CLAIMANT

#59 - Kelly, Dr. J.T.

Number of Acres: 798

Location: On the headwaters of Piney River and south of Hogback mountain.

Roads: The old Jamison road crosses this tract, but practically the only outlet is down Piney River, a distance of approximately 8 miles to the Lee Highway.

Soil: Sandy clay loam with numerous rock outcrops.

History of Tract and condition of timber: ----(SEE REVERSE SIDE FOR THIS INFORMATION)

Improvements:

1½ Story frame house, and one small frame stable.

Acreage and value of types:

Types	Acreage		Value per acre	Total Value
Ridge: --	10	@	\$1.00	\$10.00
Slope:--	434.00	@	2.25	976.50
Cove:				
Grazing Land: --	354	@	13.00	4602.00
Fields Restocking:				<u>\$5588.50</u>
Cultivated Land:				
Orchard:				
Minerals:				
Value of Land: \$	5588.50			
Value of Improvements: \$	100.00			100.00
Value of Orchard: \$				<u>\$5688.50</u>
Value of Minerals: \$				
Value of Fruit: \$				
Value of Timber: \$				
Value of Wood: \$				
Value per acre for tract: \$	7.12			
Incidental damages arising from the taking of this tract: \$	NONE			

Geo. N. Pen. CLERK

Continued from other side

NAME OF OWNER

HISTORY OF TRACT AND CONDITION OF TIMBER:

All of the tan bark and merchantable saw timber was removed about 30 years ago and much of the remaining timber was deadened about 20 years ago in an attempt to convert the tract into grazing land. Only a comparatively small portion of the land so treated is now in sod. Much of the tract is covered with briars and young locust sprouts. Remaining stand of timber is of very poor quality and has no market value. The owner has done very little in recent years to keep down the brush and briars which are crowding out the grass. Practically the entire tract is enclosed with good wire fence.

(History of Tract and condition of timber:---(SEE REVERSE SIDE FOR THIS INFORMATION)

Improvements:

1 1/2 story frame house, and one small frame stable.

Average and value of types:

Type	Average	Value per acre	Total Value
Ridge	10	\$1.00	\$10.00
Slope	454	3.28	1488.52
Cover			
Grazing Land	384	13.00	4992.00
Fields			
Cultivated Land			
Orchard			
Minerals			
Value of Land: \$			5588.50
Value of Improvements: \$			100.00
Value of Orchard: \$			
Value of Minerals: \$			
Value of Fruit: \$			
Value of Timber: \$			
Value of Wood: \$			
Value per acre for tract: \$			7.12

Incidental damages arising from the taking of this tract: \$ NONE

W. A. [Signature]



**OFFICE OF COUNTY CLERK**

OF RAPPAHANNOCK COUNTY

WASHINGTON, VIRGINIA

HON. J. R. H. ALEXANDER, JUDGE  
JAS. M. SETTLE, CLERK  
ELIZABETH H. DEBERGH, DEP. CLERK

April 13th, 1933.

Judge J R H Alexander,  
Leesburg, Virginia.

My dear Judge:

I am herewith enclosing letter this day received from William D. Medley and Arthur E. Cook, attorneys for Alfred B. Isles, together with motion for extension of time and exceptions to report of Appraisal Commissioners for Shenandoah National Park.

I am sending you these papers for such action as you may deem necessary.

Sincerely yours,

*Jas. M. Settle, Clerk.*

JMS/s

ASSOCIATES—

GLENN WILLETT  
CHAS. KERSHENBAUM, C. P. A.  
ARTHUR E. COOK  
GEO. WALTER SMITH  
HUGH M. FRAMPTON

WILLIAM D. MEDLEY

LAW OFFICES  
SUITE 327, SOUTHERN BUILDING  
WASHINGTON, D. C.  
METROPOLITAN 4042

April 12, 1933

James M. Settle, Clerk,  
Circuit Court of Rappahannock County,  
Washington, Virginia

Dear Sir:

We are enclosing a Motion for Extension of Time in which to file exceptions to the Report of the Appraisal Commissioners in the matter of the claim of Alfred B. Iles in the cause of the State Commission on Conservation and Development of the State of Virginia vs. Clifton Aylor and others, and thirty-seven thousand four hundred (37,400) acres of land more or less. We are also enclosing the exceptions to be filed in the event that the Court grants the motion for extension of time in which they may be filed.

Since our reasons for making this motion are fully set out in the motion itself we feel that it is possible for you, as Clerk of the Court, to present the matter to the Court for its consideration. If you will do this we will greatly appreciate your kindness as it will thus relieve us of the necessity of coming quite some distance.

Thanking you for your courtesy in this matter we are,

Yours very truly,

William D. Medley  
Arthur E. Cook

ATTORNEYS FOR ALFRED B. ILES

WDM/b  
Encs. 3.

IN THE CIRCUIT COURT OF RAPPAHANNOCK COUNTY, VIRGINIA

THE STATE COMMISSION ON CONSERVATION )  
AND DEVELOPMENT, OF THE STATE OF )  
VIRGINIA, )  
 )  
Petitioner, )  
 )  
-vs- )  
 )  
CLIFTON AYLOR AND OTHERS, and thirty- )  
seven thousand four hundred (37,400) )  
acres of land more or less, )  
 )  
Defendants. )

EXCEPTIONS TO REPORT OF APPRAISAL COMMISSION  
BY ALFRED B. ILES, DEFENDANT.

1. This cause came on to be heard before the Board of Appraisal Commissioners, and pursuant to hearing scheduled August 25, 1930, at Washington, Virginia, testimony was taken from witness R. E. Manuel, to the effect that he was foreman of operations for defendant, Alfred B. Iles, in mining operations under a certain mining lease the subject of these proceedings; that said operations were ceased upon the commencement of proceedings by the petitioner to condemn the land under authority of The Public Park Condemnation Act; that a lode of mineral ore had at that time been opened to approximately twenty feet in width and more than ten feet in height; that said lode had been definitely located to extend through Mount Marshall, on the land-lease of this defendant, for a distance of exceeding one mile; that mine buildings for general purposes, and roadways had been partially constructed to facilitate removal of said ore; that the project was abandoned solely because of commencement of said condemnation; that there was submitted approximately one hundred pounds of copper ore, which it was testified by the said R. E. Manuel had been taken from the property, and representative of the lode uncovered; and affidavit stating expenditures upon the property, the result of assays made by assayers and smelters,

and estimated content of said lode upon the leased land was submitted by defendant.

2. Notwithstanding that hearing was held, testimony taken, and evidence of mineral submitted, the said Board of Appraisal Commissioners rendered the following report, which not only negatives any value in said lease, but even infers that defendant never presented any evidence, or was heard, in any manner whatsoever:

‡ 54-I Name of Claimant, Iles, Alfred B.  
"Location: Mining lease on 1000 acre tract.

"There is no evidence before us as to any potential value. We have given Mr. Iles every opportunity to procure some evidence of mineral value, but has failed to do so.

"Geo. H. Levi, Clerk - Appraisal Comm'rs.

"Incidental damages arising from taking of this tract - \$ none."

3. The defendant Alfred B. Iles excepts to the above report in its entirety for the reasons stated in paragraph 1, hereof, that the report does not set forth the facts of evidence submitted, and for the further reason that the Board of Appraisal Commissioners is required not only to determine "potential value", but is required to make a finding in relation to the value of existing property right, at the time of commencement of the proceedings, including the value of improvements rendered useless to the defendant by the fact that the said condemnation deprived him of his right to use the property in accordance with his then vested right therein; that no judicial, nor quasi judicial authority has the right arbitrarily to state that a leasehold is of no value whatsoever, and thus lightly take private property without any compensation therefor.

4. Wherefore the Defendant, Alfred B. Iles, excepts to the entire report, and prays that it be set aside, and a determination of the value of his leasehold right in the said property be made as of the time of the commencement of the condemnation proceedings.

William D. Medley  
WILLIAM D. MEDLEY

Arthur E. Cook  
ARTHUR E. COOK  
ATTORNEYS FOR DEFENDANT,  
ALFRED B. ILES.

WILLIAM D. MEDLEY and  
ARTHUR E. COOK  
327 Southern Building,  
Washington, D. C.  
ATTORNEYS FOR DEFENDANT  
ALFRED B. ILES.

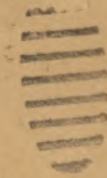


JAS. M. SETTLE  
CLERK OF THE CIRCUIT COURT  
FOR RAPPAHANNOCK CO.,  
WASHINGTON, VIRGINIA.

*Exceptions of  
Alfred B. Isles*

*Filed May 8, 1933  
by leave of Court.*

Judge J R H Alexander  
Leesburg, Virginia.



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IN THE CIRCUIT COURT  
OF  
RAPPAHANNOCK COUNTY, VIRGINIA

---

THE STATE COMMISSION ON CONSER-  
VATION AND DEVELOPMENT, OF THE  
STATE OF VIRGINIA,

Petitioner,

-vs-

CLIFTON AYLOR AND OTHERS, and  
thirty-seven thousand four  
hundred (37,400) acres of  
land more or less,

Defendants.

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EXCEPTIONS TO REPORT  
OF  
APPRAISAL COMMISSION

---

*Filed May 8-1933.*

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WILLIAM D. MEDLEY and  
ARTHUR E. COOK  
327 Southern Building,  
Washington, D. C.  
ATTORNEYS FOR DEFENDANT, ALFRED  
B. ILES.

IN THE CIRCUIT COURT OF RAPPAHANNOCK COUNTY, VIRGINIA

THE STATE COMMISSION ON CONSERVATION )  
AND DEVELOPMENT, OF THE STATE OF )  
VIRGINIA, )  
Petitioner, )  
-vs- )  
CLIFTON AYLOR AND OTHERS, and thirty- )  
seven thousand four hundred (37,400) )  
acres of land more or less, )  
Defendants. )

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BY ALFRED B. ILES, DEFENDANT.

1. This cause came on to be heard before the Board of Appraisal Commissioners, and pursuant to hearing scheduled August 25, 1930, at Washington, Virginia, testimony was taken from witness R. E. Manuel, to the effect that he was foreman of operations for defendant, Alfred B. Iles, in mining operations under a certain mining lease the subject of these proceedings; that said operations were ceased upon the commencement of proceedings by the petitioner to condemn the land under authority of The Public Park Condemnation Act; that a lode of mineral ore had at that time been opened to approximately twenty feet in width and more than ten feet in height; that said lode had been definitely located to extend through Mount Marshall, on the land-lease of this defendant, for a distance of exceeding one mile; that mine buildings for general purposes, and roadways had been partially constructed to facilitate removal of said ore; that the project was abandoned solely because of commencement of said condemnation; that there was submitted approximately one hundred pounds of copper ore, which it was testified by the said R. E. Manuel had been taken from the property, and representative of the lode uncovered; and affidavit stating expenditures upon the property, the result of assays made by assayers and smelters,

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4. Wherefore the Defendant, Alfred B. Iles, excepts to the entire report, and prays that it be set aside, and a determination of the value of his leasehold right in the said property be made as of the time of the commencement of the condemnation proceedings.

William D. Medley  
WILLIAM D. MEDLEY

Arthur E. Cook  
ARTHUR E. COOK  
ATTORNEYS FOR DEFENDANT,  
ALFRED B. ILES.

WILLIAM D. MEDLEY and  
ARTHUR E. COOK  
327 Southern Building,  
Washington, D. C.  
ATTORNEYS FOR DEFENDANT  
ALFRED B. ILES.

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IN THE CIRCUIT COURT  
OF  
RAPPAHANNOCK COUNTY, VIRGINIA

---

THE STATE COMMISSION ON CONSER-  
VATION AND DEVELOPMENT, OF THE  
STATE OF VIRGINIA,

Petitioner,

-vs-

CLIFTON AYLOR AND OTHERS, and  
thirty-seven thousand four  
hundred (37,400) acres of land  
more or less,

Defendants.

---

EXCEPTIONS TO REPORT  
OF  
APPRAISAL COMMISSION

---

*Filed May 8-1933.*

---

WILLIAM D. MEDLEY and  
ARTHUR E. COOK,  
327 Southern Building,  
Washington, D. C.  
ATTORNEYS FOR DEFENDANT,  
ALFRED B. ILES.

IN THE CIRUCIT COURT OF RAPPAHANNOCK COUNTY, VIRGINIA

THE STATE COMMISSION ON CONSERVATION )  
AND DEVELOPMENT OF THE STATE OF )  
VIRGINIA, )  
Petitioner, )  
-vs- )  
CLIFTON AYLOR AND OTHERS, and thirty- )  
seven thousand four hundred (37,400 )  
acres of land more or less, )  
Defendants. )

MOTION FOR EXTENSION OF TIME

Now comes Alfred B. Iles, by his attorneys, William D. Medley and Arthur E. Cook, and moves this honorable Court for extension of time to ten days from the hearing hereon in which to file exceptions to the Report of the Appraisal Commissioners, filed in this Court on the eighteenth day of May, 1932, and gives as reasons therefor:

That no notice of the filing of said report was received by this defendant or his attorneys, notwithstanding that diligent efforts to obtain information concerning the same were made by this defendant and his attorney, Arthur E. Cook; that the Board of Appraisal Commissioners was advised in July 24, 1930, of the removal of Mr. Iles from Washington, D. C., to Colorado Springs, Colorado; that subsequently correspondence with the Clerk of said board was with defendant's attorney, Arthur E. Cook, who represented the defendant at a hearing conducted pursuant to order of this Court; that said attorney was advised that he would be advised of the filing of said report, but notwithstanding several inquiries in regard thereto neither defendant nor his attorney has received notice thereof.

Your petitioner has ready for filing in this cause exceptions to the said report, and therefore prays that the same may be accepted and considered herein.

William D. Medley

Arthur E. Cook

Attorneys for ALFRED B. ILES,  
defendant.

WILLIAM D. MEDLEY,  
ARTHUR E. COOK,  
327 Southern Building,  
Washington, D. C.



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IN THE CIRCUIT COURT  
OF  
RAPPAHANNOCK COUNTY, VIRGINIA

---

THE STATE COMMISSION ON CONSER-  
VATION AND DEVELOPMENT OF THE  
STATE OF VIRGINIA,

Petitioner,

-vs-

CLIFTON AYLOR AND OTHERS, and  
thirty-seven thousand four hu  
undred (37,400) acres of  
land more or less,

Defendants.

---

MOTION FOR EXTENSION OF TIME

---

*Filed May 8-1933.*

---

WILLIAM D. MEDLEY and  
ARTHUR E. COOK  
327 Southern Building,  
Washington, D. C.  
ATTORNEYS FOR DEFENDANT,  
ALFRED B. ILES.

IN THE CIRCUIT COURT OF RAPPAHANNOCK COUNTY, VIRGINIA,  
MONDAY, MAY 8th, 1933.

This day came Alfred B. Isles, by counsel, and moved the Court for leave to file exceptions to report of Appraisal Commissioners filed on May 18, 1932 in the condemnation proceedings of State Commission on Conservation and Development of the State of Virginia vs. Clifton Aylor, et als., which motion the Court doth grant, subject however to such exceptions as may be made and filed thereto; whereupon said exceptions were filed.

A COPY-TESTE:

James M. Seete  
Clerk.

# State Commission on Conservation and Development

RICHMOND, VA.

WILLIAM E. CARSON, CHAIRMAN, RIVERTON  
COLEMAN WORTHAM, VICE CHAIRMAN, RICHMOND  
JUNIUS P. FISHBURN, ROANOKE  
E. GRIFFITH DODSON, NORFOLK  
RUFUS G. ROBERTS, CULPEPER  
THOMAS L. FARRAR, CHARLOTTESVILLE  
LEE LONG, DANTE  
ELMER O. FIPPIN,  
EXECUTIVE SECRETARY AND TREASURER



PHONE RANDOLPH 3755

## BUREAUS OF THE COMMISSION

GEOLOGICAL SURVEY  
WATER RESOURCES AND POWER  
FOREST SERVICE  
PARKS  
ARCHAEOLOGY AND HISTORY  
STATE PUBLICITY

At the meeting of the State Commission on Conservation and Development, held in Richmond, December 21, 1928, the following motion was made by Mr. Wortham, seconded by Mr. Fishburn, and carried:

"For the purposes contemplated in Section twenty-four (24) of the Public Park Condemnation Act, William E. Carson, Chairman of the State Commission on Conservation and Development, is hereby designated and appointed in writing the representative, agent, and attorney of the said Commission, through whom the Commission desires to act in the institution and maintenance of proceedings looking to the acquirement, by condemnation proceedings or otherwise, of title to lands and other property, for a public park or for public park purposes under authority of the National Park Act, and the Executive Secretary of the Commission is hereby authorized and directed to furnish to the said William E. Carson, Chairman of the State Commission on Conservation and Development, such properly certified copies of this resolution for file with the record of any such condemnation proceedings which may be instituted under authority of said Public Park Condemnation Act."

Elmer O. Fippin

Subscribed and sworn to before me this  
28th day of October, 1929.

Anna Belle Foltz  
Notary Public.

My commission expires October  
16, 1932.



260 copies notice  
mailed out.  
Apr. 29-1930.

Suit # 149.

PETITION OF THE STATE CON-  
SERVATION AND DEVELOPMENT OF THE  
STATE OF VIRGINIA, FOR THE CON-  
DEMNATION OF LANDS IN ~~SPENCER~~  
COUNTY. *Rappahannock.*

P E T I T I O N

*Filed Apr 7/30*  
*Alex. J. Jones.*

LAW OFFICES

WEAVER & ARMSTRONG

FRONT ROYAL, VA.

Value of land by types:

<u>Type</u>	<u>Acreage</u>	<u>Value per acre</u>	<u>Total Value</u>
Ridge	10	\$1.00	\$10.00
Slope	434	2.00	868.00
Fg	144	15.00	2160.00
Fr	210	3.00	630.00
	<u>798</u>		<u>\$3668.00</u>

Total value of land .....	\$3668.00
Total value of improvements .....	<u>150.00</u>
Total value of tract .....	\$3818.00
Average value per acre .....	\$4.78

X -- This includes area in laps #59-I-II-III & IV.

59+59a-  
59-I-II-III-IV  
Claim of J. T. Kelley  
In the Circuit Court of Rappahannock County, Virginia, No. 149, At Law.  
The State Commission on Conservation and Development of the State of Virginia, Petitioner, vs. Clepton Taylor et al and 37400 acres

more or less, of land in Rappahannock County, Virginia, Defendants.  
The undersigned, in answer to the petition of the State Commission on Conservation and Development of the State of Virginia, and in response to the notice of condemnation awarded upon the filing of said petition and published in accordance with the order of the Circuit Court of Rappahannock County, Virginia, asks leave of the Court to file this as his answer to said petition and to said notice.

My name is J. T. Kelley

My Post Office Address is Chilpeper R.F.D. #4

I claim a right, title, estate or interest in a tract or parcel of land within the area sought to be condemned, containing about 1460 acres, on which there are the following buildings and improvements: See back of sheet for description

This land is located about 5 to 6 miles from Sperryville Virginia, in the \_\_\_\_\_ Magisterial District of said County.

I claim the following right, title, estate or interest in the tract or parcel of land described above: (In this space claimant should say whether he is sole owner or joint owner, and if joint owner give names of the joint owners. If claimant is not sole or joint owner, he should set out exactly what right, title, estate or interest he has in or to the tract or parcel of land described above).

Sole owner

The land owners adjacent to the above described tract or parcel of land are as follows:

North Jno B. Miller, decd.

South Varyers

East F. B. Bolen & Doyers

West Dr. Ed Brumbaugh & Hockman

I acquired my right, title, estate or interest to this property about the year 1908<sup>5</sup> 1919 in the following manner:

By cash purchase

I claim that the total value of this tract or parcel of land with the improvements thereon is \$ 23000. I claim that the total value of my right, title, estate or interest, in and to this tract or parcel of land with the improvements thereon is \$ 23000

I am the owner of \_\_\_\_\_ acres of land adjoining the above described tract or parcel of land but lying outside the Park area, which I claim will be damaged by the proposed condemnation of lands within the Park area, to the extent of \$ \_\_\_\_\_

(In the space below should be set out any additional statements or information as to this claim which claimant desires to make; and if practicable he should also insert here a description of the tract or parcel of land by metes and bounds).

Remarks: About 1000 enclosed & cross sectioned with woven fence & improved by 3 sets buildings, one of which I built new with 4 rooms & porches, remodeled others, built goat sheds. Spent much money.  
(Continue remarks if necessary on the back).

Witness my signature (or my name and mark attached hereto) this 4<sup>th</sup> day of June, 1930.

STATE OF VIRGINIA, COUNTY OF Chilpeper, To-wit:

The undersigned hereby certifies that J. T. Kelley the above named claimant personally appeared before him and made oath that the matters and things appearing in his above answer are true to the best of his knowledge and belief, this 4<sup>th</sup> day of June, 1930.

John R. Kerrick J.P.  
Clerk of the Court, or Special Investigator or Notary Public, or Justice of the Peace.

Filed June 5 - 1930 -  
Jas. M. Sittle, Clerk.

(of which I kept records) for labor in chopping, deadening, burning, sowing grass seed fencing etc, maintained both winter & summer for many years a herd of from 200 to 1000 Angora goats for the purpose of developing virgin soil in soil grazing, also kept sheep & cattle in summer time from 1908 to the present.

For said 1000 acres, I feel I should be paid \$20500 as follows:

300 a. 1st. class sod	\$30 per a.	\$9000
About 300 a. Sod + brush	20 " "	6000
300 a. Some sod but mostly brush	\$15	4500
100 a. " patches of sod, very rough, containing 1/2 miles trout stream	\$10	1000
<hr/>		<hr/>
1000 acres. Average per a.	\$20.50	\$20500

Said 1000 acres is part of one boundary on Mt. of 1400 acres. The remaining 400 acres of said Tane tract, (1400) I donated to the Park. This has never been improved, but about 300 acres of it is smooth, practically free from stones & very fertile soil. Lying at north end of entire tract of 1400 acres.

2nd a 60 acre tract purchased in 1919 at foot Mt. my residence. Cost for land \$1100 cash. On this I built all new, but very plain, a 6 room dwelling with porches, large stable, hen house, meat house, spring house & developed garden. I think for this I should be paid \$2500.

Now gentlemen, I hope & feel I have been reasonable with you & if you desire any further more detailed explanations, I shall be pleased to give them to you.

Respectfully submitted

Dr. J. V. Kelley  
R-4  
Culpeper, Va.

*[Faint handwritten notes and stamps, including "The State Commission on Conservation and Development in the Circuit Court of..."]*



CULPEPER, VA.

5/21

1921

Mr. J. M. Settle, clk of Circuit Court Rap. Co. Va.

Dear Sir: -

This is to express my willingness to let Park Com. have all my lands in Park Area at the following prices:

About 300 a. in 1 <sup>st</sup> class sod at \$30.00 <sup>per a.</sup>	= 9000
" 300 a. sod + brush \$20.00 per a.	6000
" 300 a. not as good grazing at \$15.00 per a.	4500
" 100 a. containing Trout Stream at \$10.00 per a.	1000
1000 Acres	\$20500

Above described 1000 acres is enclosed with woven wire fence + cross sectioned + further improved by fire, ox, grass seed sowing, heavy stocking with goats, sheep + cattle since 1908.

400 Acres, a part of my 1400<sup>above described</sup> acre tracts, + which is not enclosed nor improved, I have donated to the Park.

2<sup>nd</sup>

CULPEPER, VA.....192.....

A 60 acre tract lying at foot mt.  
my residence + on which I established  
all new building descriptions of same  
are in your files.

For said land alone, I paid \$1100  
+ feel I should have \$2500

Shall be glad to give any  
further description desired.

Respectfully submitted

J. T. Kelley

CULPEPER, VA.

5/21

1930

My dear Mr. Settle, clk.

I am enclosing what I think you wish to know from me. I trust hope that I need not appear in person before your Hon. Court by June 7<sup>th</sup> 1930.

Please let me know by return mail if this is not satisfactory & you wish my presence.

Very Resp Yours  
J. T. Kelley

J. T. KELLEY, M. D.

Claim of  
Dr. J. P. Kelly

FILED IN  
CLERK'S OFFICE  
RAPPAHANNOCK COUNTY

June 5 1930

Teste: Jan. M. Scurro Clerk

*[Faint, illegible handwritten text, likely bleed-through from the reverse side of the page]*