

VIRGINIA

IN THE CIRCUIT COURT FOR PRINCE WILLIAM COUNTY

IN THE MATTER OF: Antioch Baptist Church  
Haymarket Baptist Church

PETITION

Come now your Petitioners, the Congregation of the Antioch Baptist Church, Antioch, Gainesville Magisterial District, Prince William County, Virginia, and respectfully represent:

1. That it is a Baptist Church, located near Waterfall, Gainesville Magisterial District, Prince William County, Virginia; that as such, it has had appointed by this Court, the Trustees, John Costello, Joseph Owens and Herman Smith, who hold title to certain real property owned by the church at Waterfall and owned by the Women's Missionary Society, a Society of the church; that the membership or congregation of said church met on the 14<sup>th</sup> day of July, 1964, at which called meeting a resolution was passed, certified copy of which is attached hereto and prayed to be read as a part hereof, which resolution requests the Haymarket Baptist Church, Haymarket, Virginia, to accept Antioch members into its membership and to accept title to the property of Antioch church and such funds as may be in the church treasury with the provision that it would hold such funds and the property in virtual trust for the Antioch church to such time as the Antioch church may be reactivated. Your Petitioners further state that Quentin Lawler of Haymarket, Virginia, J. T. L. Rollins of Wellington, Prince William County, Virginia and Early Griffith of Brentsville, Virginia are the present Trustees of the property of the Haymarket Baptist church and your Petitioners are advised and believe that the Haymarket Baptist church is ready and willing to accept the trust expressed by the membership of the Antioch Baptist church to accept the property upon the agreement set forth in the resolution attached hereto.

NOW THEREFORE, in accordance with the express wish of the said membership of the Antioch Baptist church, your Petitioners, the present trustees of the Antioch Baptist church, ask leave to have appointed by this Honorable Court in their place and stead, the Trustees of the Haymarket Baptist church aforesaid,

Antioch Baptist Church documents were loaned to RELIC Bull Run Regional Library, Manassas, Va. by Larry Lee, former pastor of Antioch Baptist Church on June 2013. They were photocopied and scanned. Scanned copies stored on RELIC computer under Documents\Churches\Antioch Baptist Church docs from Larry Lee 6/2013.

V I R G I N I A

IN THE CIRCUIT COURT OF PRINCE WILLIAM COUNTY

EX PARTE:

ANTIOCH BAPTIST CHURCH, ANTIOCH, PRINCE WILLIAM COUNTY,  
VIRGINIA

PETITION FOR APPOINTMENT OF CHURCH TRUSTEES

To The Honorable Judges of the Circuit Court of Prince William  
County:

The Antioch Baptist Church, Antioch, Prince William County,  
Virginia, respectfully shows unto your Honors that at a regular  
business meeting of the Church, held the 27th day of July, 1962,  
at said Church, near Waterfall, Prince William County, Virginia,  
the following Church members were elected Trustees of the Church:  
Joseph Owens, J. W. Costello and Herman Smith, in the place and  
stead of the Trustees of the Church heretofore serving, all as  
set forth in a copy of the minutes of the said meeting, signed  
by the Church Clerk, attached hereto, and by this reference,  
made a part hereof.

In pursuance of said regular Church meeting and election of  
Trustees, application is hereby made for the appointment of the  
Trustees aforesaid, Joseph Owens, J. W. Costello and Herman  
Smith, to hold legal title to the property of the said Church, and  
to do all such other acts as are required of such Trustees as is  
appropriate and fitting.

THE ANTIOCH BAPTIST CHURCH OF ANTIOCH,  
PRINCE WILLIAM COUNTY, VIRGINIA

BY: \_\_\_\_\_  
COUNSEL

*Turner T. Smith*  
Turner T. Smith  
Attorney at Law  
P. O. Box 51  
Manassas, Virginia

(Counsel for Petitioners)

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STATE OF VIRGINIA

COUNTY OF PRINCE WILLIAM, TO-WIT:

Joseph Owens, one of the petitioners named in the foregoing petition, being duly sworn, says that the facts and allegations therein contained are true, except so far as they are therein stated to be on information, and that so far as they are therein stated to be on information, he believes them to be true.

Joseph Owens  
Joseph Owens

Taken, sworn to and subscribed before me, a Notary Public of and for the county and state aforesaid, in my county aforesaid, this 16 day of Oct, 1964.

M. Jewell Milton  
Notary Public

My commission expires on the 10 day of Oct, 1966.

STATE OF VIRGINIA

COUNTY OF PRINCE WILLIAM, TO-WIT:

Herman Smith, one of the petitioners named in the foregoing petition, being duly sworn, says that the facts and allegations therein contained are true, except so far as they are therein stated to be on information, and that so far as they are therein stated to be on information, he believes them to be true.

Herman Smith  
Herman Smith

Taken, sworn to and subscribed before me, a Notary Public of and for the county and state aforesaid, in my county aforesaid, this 16 day of Oct, 1964.

M. Jewell Milton  
Notary Public

My commission expires on the 10 day of Oct, 1966.

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Quentin Lawler, J. T. L. Hollins and Early Griffith, to accept and to hold title to the real property of the Antioch Baptist church, and your Petitioners further ask leave to turn over the funds of the Antioch Baptist church to the Haymarket Baptist church to be held separate and apart by the Haymarket Baptist church for the return to the Antioch Baptist church in event the latter church is reactivated and that this Honorable Court will cause to be entered such Order as may be necessary and proper to effect the purposes hereinabove mentioned in pursuance of Section 57-8 of the 1950 Code of Virginia as amended.

John Costello  
John Costello  
Joseph Owens  
Joseph Owens  
Herman Smith  
Herman Smith

STATE OF VIRGINIA  
COUNTY OF PRINCE WILLIAM, TO-WIT:

John Costello, one of the petitioners named in the foregoing petition, being duly sworn, says that the facts and allegations therein contained are true, except so far as they are therein stated to be on information, and that so far as they are therein stated to be on information, he believes them to be true.

John Costello  
John Costello

Taken, sworn to and subscribed before me, a Notary Public of and for the county and state aforesaid, in my county aforesaid, this 17 day of Oct, 1964.

McJewell M. Minton  
Notary Public

My commission expires on the 10 day of Oct, 1966.

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VIRGINIA

IN THE CIRCUIT COURT FOR PRINCE WILLIAM COUNTY

IN THE MATTER OF: Antioch Baptist Church  
Haymarket Baptist Church

ORDER

This day came John Costello, Joseph Owens and Herman Smith, Trustees mentioned in the Petition herein set out, by their attorney, and presented to the Court their petition to turn over to the Trustees of the Haymarket Baptist Church, Haymarket, Prince William County, Virginia, the real property and funds of the church treasury of the Antioch Baptist Church to Quentin Lawler, J. T. L. Rollins and Early Griffith, trustees of the Haymarket Baptist church, to hold such property in virtual trust for the Antioch Baptist church in the event it should be re-activated.

And upon evidence being produced before the Court that it is the wish of the membership mentioned in said Petition to turn over the real property and funds of the said Antioch Baptist church to the trustees of the Haymarket Baptist church, it is

ADJUDGED, ORDERED AND DECREED that the said Quentin Lawler, J. T. L. Rollins and Early Griffith, be named trustees in the place and stead of John Costello, Joseph Owens and Herman Smith, to hold title to all real property of the Antioch Baptist church and the Women's Missionary Society of the Antioch Baptist church, conditioned upon their returning the said property to the Antioch Baptist church or its trustees at such time as the Antioch Baptist church should be reactivated.

ENTERED this \_\_\_\_\_ day of \_\_\_\_\_, 1964.

\_\_\_\_\_  
Judge

I ASK THIS:

Turner T. Smith - 406 Lee Ave.,  
Manassas, Virginia - Attorney  
for Petitioners

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