

May 1869 - No. 211

Frost, Margaret V,
Lee, Giles next friend

vs

Frost, William

DIVORCE

Marrried 10/18/1865; he
abandoned her 3/20/1866.

Margaret V. Frost, by }
her next friend, Giles Lee, - Plaintiff }
Against }
William J. Frost, - Defendant, }
In the Circuit Court of }
Jefferson County Missouri }

The Plaintiff, by her next friend, Giles Lee, states that on the 18th day of October 1865, in the County of Jefferson in the State of Missouri, she was lawfully married to the Defendant, - That she continued to live with Defendant as his wife, from and after the day and year aforesaid, until about the 30th day of March 1866, - that during all that time, Plaintiff faithfully demeaned herself and discharged all her duties as the wife of Defendant, and at all times treated him with kindness and affection, but that the Defendant, wholly disregarding his duties as the husband of Plaintiff, neglected to provide for her support and maintenance, and went away and entirely abandoned her, and has remained absent ever since. And Plaintiff therefore charges that the Defendant has, without a reasonable cause, absented himself from her for the space of one year and more, since the marriage aforesaid, -

Plaintiff further states that she has resided one whole year within this State, next before the filing of this petition, - Plaintiff states that the Defendant is seized and possessed of real estate of the value of two hundred dollars, and that she is wholly without the means of support, and for the prosecution of this suit, -

Plaintiff therefore prays to be divorced from the bonds of matrimony contracted as aforesaid with the Defendant, - and that the Court will adjudge to her such support and maintenance out of the property of the Defendant as may be deemed just and reasonable, and to make such further orders and judgments touching the premises as may be just and proper.

} Margaret V. Frost
Plaintiff

This Affiant the Plaintiff makes oath and says that the facts stated in the above petition are true according to the best knowledge and belief of the Plaintiff, and that the Complaint is not made out of levity or by collusion, fear or restraint between the Plaintiff and the Defendant for the mere purpose of being separated from each other but in sincerity and truth for the causes mentioned in the petition, - and this Affiant

Further states that the Defendant, William
J. Frost, is a now-resident of the State of
Missouri.

Subscribed & sworn to before } Margaret v. Frost
me this 7th day Sept 1868. }

Elias J. Honey, Clerk Cir Ct,
U. S. Marine Dept,

No 211

In Circuit Court

Jefferson County

2675

Margaret D. Frost

vs.

William J. Frost

Petition
for divorce

Make order, publish
ing notice of

Alvren
for Plff.

Filed Sept 7 1868
E. F. Honey Cl.

\$10.50 paid by Plff

COUNTY OF JEFFERSON.

The State of Missouri,

To

J. P. Bellas, Wm McRay & J. J. Leare.

YOU ARE HEREBY COMMANDED, That setting aside all manner of excuse and delay, you appear

before our Circuit Court for the County aforesaid, on the

May 1869 at Hillsboro, then and there to testify, and the truth to say in a certain

matter of controversy, now pending in our said Court, wherein

Must is Margaret R

Plaintiff, and

William J. French is

Defendant, on the part of Plaintiff

and herein you are in no wise to

fail.

Witness, ELIAS F. HONEY, Clerk of our said

Court, with the seal thereof hereto affixed, at office

this day of A. D. 186

Elias F. Honey Clerk.

Jy 24 1869

2675-

SUBPOENA.

To Jefferson Circuit Court.

May Term, 1869

Margaret V. Frost
vs

William J. Frost

for Plaintiff

J. P. Lollar x

Wm McKay

J. J. Caro. x

Wm McKay 13

Served the within on the 13th of May 1869 at Jefferson County Mo., &
returning the same to the within upon the 16th of May. The within named
J. P. Lollar and J. J. Caro can not be found within three of service
as the prisoners can not be crossed at present, water being over the
banks this 18th day of May a d 1869.

For clerk under Sheriff
for said return on the

Deputy

Margaret Frost, Plaintiff
3
Jasper Frost, Defendant

The Defendant asks this Court
to remove the statutory restriction from
him:

John L. Thomas
att'y for deft.

2675-

M. Frick

J. Frost

Motion to have
restoration.

Filed Nov 26 1869
Elias D. Kearney cl