

DeFerson County Circuit Court
Case Files - Civil

Box

23

Folder 59

May 1869, No. 286

Moness, Susan

vs

Moness, Pleasant R.

Divorce

Married 30 July 1865; desertion

Susan Maness, Plaintiff

vs

Pleasant R. Maness, Defendant

In the Jefferson Circuit
Court May Term 1869

Plaintiff states, that on the 30th day of July 1865 in the County of Jefferson in the State of Missouri she was lawfully married to the Defendant: that Plaintiff continued to live with Defendant as his wife from and after the day & year aforesaid until November 1867: that during all that time she faithfully demeaned herself and discharged all her duties as the wife of Defendant and at all times treated him with kindness and affection: but the said Defendant wholly disregarding his duties as the husband of Plaintiff on or about the day of November 1867 voluntarily abandoned her without any just cause or excuse and has remained away from her ever ^{since}, and that he has continued away from her bed and board for more than whole year next before the

filing of this petition without any
just cause or provocation.

Plaintiff avers that she has resided
one whole year in the State of Missouri
in next before filing this petition.

Plaintiff further states that ^{there} was
born of the marriage of aforesaid
one child a girl, now of tender age,
aged nearly three years.

Plaintiff therefore prays to be divorced
from the bonds of matrimony
heretofore contracted between Plaintiff
and Defendant as aforesaid: that
she may have the care, custody and
control of her said child and for
other proper relief.

Susan Moneys

By J. H. Moneys Atty.

Plaintiff Susan Moneys, makes
oath and says that she believes the
above petition and the matters
as therein stated are true and
the complaint is not made out of
levity or by collusion fear or ~~restraint~~
restraint between the Plaintiff and
Defendant for the mere purpose
of being separated from each ^{other}, but

in sincerity and truth for the causes men-
tioned in the petition.
Sworn to & subscribed
before me March 30th
1869.

of Susan ^{her} ~~husband~~ ^{names} ~~husband~~

Elias F. Henry clerk

By S. H. Alfred Depy

Susan Moness

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Pleasant R. Moness

Petition for Divorce

Filed March 30 1864
Elias J. Henney dk

THE STATE OF MISSOURI, } SS.
COUNTY OF JEFFERSON.

THE STATE OF MISSOURI,

To the Sheriff of the County of Jefferson—Greeting:

We command you, that you summon

Pasant H. Mares

if he be found in your County, that
he be and appear before the Hon. Judge of our Circuit Court, on the
first day of the next term thereof, to be begun and held at the town of Hillsboro,
within and for the County of Jefferson, on the *7th* Monday after the
fourth Monday of *March 1869* next, then and there to answer unto

Susan Moaness

upon *her* original petition, a copy whereof is hereunto annexed and
accompanies this writ, and have you then there this writ.

Witness, ELIAS F. HONEY, Clerk of our said Circuit Court,
with the seal thereof hereunto affixed, at office in Hillsboro, this

30th day of *March* A.D. 1869

E. F. Honey

Clerk Circuit Court.

By *L. H. Clifford*

18 280

2795

JEFFERSON CIRCUIT COURT.

May Term, 1869

Shadash Maness

vs Shumway

J. H. Maness

(Original)

The within was served on the 13th Day of April a D 1869 at Jefferson Co. Mo. by delivering a Copy of the Writ and Petition ^{as furnished to me by the Clerk of the Circuit Court} to Amos Maness the father of the Defendant, and a White member of the family over and above the age of Sixteen years, at the usual place of abode of the Defendant P. B. Maness

Fred Lusk Sheriff
per Fred Vollmuth
Deputy

Fees 1.00

300 254 254
copy Fee 100
wage 110
add 50
Dues 10
file 05
as 05
\$2.80