

March 1871, NO. 4

Simon, H. T.

Gregory, Charles R.

vs

Bullock, Clark

Debt, account

Debt \$220.99 for fabric
and clothing; Dr. Louis Jones, Thomas
Bettie, J. B. Dover, Caleb Christopher,
L. H. Alford, Wash Vinyard garnishments on
attachment

Saint Louis,

October 10 1870

M. Clark & Galloway Victoria M.
 Bought of **H. T. SIMON & GREGORY,**

Wholesale Dealers in

Fancy Dry Goods, Gentlemen's Furnishing Goods,

NOTIONS, CLOVES, HOSIERY, &c.

507 North Main St., bet. Vine and Washington Av.



TERMS CASH.

Salesman.....

Positively no Goods taken back unless Damaged.

All Claims for Deductions must be made within Five Days from Receipt of Goods.

1	1	Jeans	25	20	410
1	1	Kenebeck	21	42	914
1	1	Humboldt	46	62	2845
1	1	Guy Twill flannel	58	40	2320
1	1	White	25	33	833
1	1	1 Box Alpaca	57	33 ¹ / ₂	17
2	1	Arumus	71	18	1287
942	1	Poplin	25	32	813
1	1	Plaids	13	20	260
1	1	Wool Delaines	28	32	926
1	1	Crash	25	14	350
1	1	Table Damask	28	30	690
2	1	Covers	90		180
1	1	Big Shawl			150
13/10	4	Aprs	2		8
3	3	1 Gal. shirts	1		3
3	3	Meatrop.	130		450
3	3	Ryleighs	160		480
1	1	Dark Ribbon			750
1	1	Quarterfill			90
6/12	1/2	Wegl. shirts	12		5
1/4	1/4		19		475
472	1/4		20		5
1/2	1/2	1 Old 1 Pows	275		138
1/2	1/2	Key	2		1
1	1	Stamped Aprons			175
1/3	1/3	1/2s Gloves	1		2
1	1	Rob M. Hose			325
1	1	Mer 1/2			3
1	1	Weg 1/2			225
1	1	1 Box 1/2			75
340	1/2	White shirts	15		750
3400	7/12		1350		758
		And Forwarded			211.84

7811A

John D. Morrill



Dearest

Henry Ford

Castro

2d

Stridano

Debut

1/3 27

Wells

Case

2

1



69

55

275

21182

220.99

Filed Dec 19 1870

Mr Dyer &
B. The Home Dept

H. T. Simon & Chas Gregory Plaintiffs
business under the name of
H. T. Simon & Gregory Pla
against
Clark Bullock Defendant

In The Jefferson County Circuit
court March Term A.D. 1871

Plaintiffs state that
defendant owes them Two hundred
and Twenty and 99^{ths} dollars for goods
sold and delivered by plaintiffs
to defendant, The particulars of
all ~~of~~ which and also the credits
thereon, will appear by an
account herewith filed, Plaintiff
ask judgment for Two hundred
and Twenty and 99^{ths} dollars with
interest being the balance due
them

Fischer, Thomas & Thomas
Attorneys for Pla,

Simon & Gregory
against

Blank Bullcock

Petition Attachment
~~~~~

Filed Dec 19<sup>th</sup> 1870,  
M.S. Bayle Clerk,  
Jef Ohio Marine Dept.

State of Missouri }  
County of Jefferson }

H. J. Simon & Chas. R. Gregory doing busnes under the  
name & style of H. J. Simon & Gregory Pls.

against  
Clark Bullock defendant

In The Jefferson Co. Cir Court  
March Term 1870

This affiant states that The plaintiffs  
in the above entitled cause has  
a just demand against the defendant  
therein, now due, and that The  
Amount which this affiant believes  
the plaintiff ought to recover  
after allowing all just credits  
and set offs is Two hundred and  
Twenty dollars & 00/100, and that this  
affiant has good reason to believe  
and does believe, that The defendant  
has fraudulently conveyed his  
property so as to hinder & delay  
his creditors, Because the defendant  
is a non resident of the state of  
Mo.

Subscribed & sworn to } L. B. Morgan  
before me this 16<sup>th</sup> day }  
December A.D. 1870 }  
W. J. Boyce Clerk  
By The Home Detch.

Simon & Gregory  
against

Charles Bullock

Attorneys

Official

Filed Dec 19<sup>th</sup> 1870,

M. S. Doyle Clerk

By Chas. M. Alvord Del

A. T. Simon & ~~Chas~~ Gregory doing business  
under the name & style of  
S. T. Simon & Gregory Pla,  
a gainst  
Clark, Bullock

We S. T. Simon & Gregory  
as principals and Peter Jenni &  
Geo. B. Morgan as securities, acknowledge  
ourselves to stand indebted to the State  
of Missouri in the sum of Five  
hundred dollars, for the payment  
whereof we bind ourselves, our  
heirs, executors and administrators

The condition of the above obligation  
is, that whereas S. T. Simon & Gregory  
as plaintiff is about to commence  
a suit by attachment in the Circuit  
Court of Jefferson County Mo, against  
Clark Bullock, defendant, returnable  
to the next term thereof, wherein  
the sum ~~is~~ <sup>is</sup> ~~amount~~ <sup>is</sup> Two hundred  
and Twenty <sup>99</sup>/<sub>100</sub> Dollars,, Now, if  
the said plaintiff shall prosecute  
their action without delay, and with  
effect; refund all sums of money that  
may be ~~adjudged~~ <sup>adjudged</sup> to be refunded  
to the defendant, or found to have  
been received by the plaintiff and

not pretty due to <sup>the</sup> ~~the~~ and pay all  
damages that may accrue to any  
defendant or provider, by reason  
of the attachment, or any process  
or proceeding in the suit, or by  
reason of any judgment or process  
thereon, then this obligation is to be void  
otherwise to remain in full force  
whenever our hands and seals

This 16<sup>th</sup> day of Decr, 1870

Witness my

19<sup>th</sup> day of Decr 1870.

Wm Lloyd Garrison

By Wm Lloyd Garrison

Attest

John T. Loring

Wm Lloyd Garrison

Attest  
John T. Loring

Wm Lloyd Garrison  
John T. Loring

S. T. Simond Gregory  
Against  
Clark Bullock

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Attachment Bond

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Filed and approved  
Dec 19<sup>th</sup> 1870,

W. S. Boyce clk

By Chas Hornedup

**STATE OF MISSOURI,**  
**COUNTY OF JEFFERSON.**

The State of Missouri to the Sheriff of Jefferson County, Greeting :

WE COMMAND YOU to attach

*Clark Bullock*

by all and singular *his* . . . lands and tenements, goods, chattels, rights, moneys, credits, evidences of debt, and effects, or so much thereof as shall be sufficient to satisfy the sum of *Two hundred & twenty* dollars and *ninety nine* cents, with interest and costs of suit, in whose possession soever the same may be found in your county, and that you summon the said

*Clark Bullock*

that *he* . . . be and appear before our Circuit Court of the county of Jefferson, on the first day of the next term thereof, to be holden at the Court House in Hillsboro, in said county of Jefferson, on the *Sixth* day of *March* . . . next, then and there to answer the petition of *Simon Gregory*

wherein *they* . . . ask judgment for

*Two hundred and twenty*

dollars and

*ninety nine*

cents, and that you also summon

~~and~~ all other persons that you shall find in the possession of goods, money or effects of the defendant, not actually seized by you, and all debtors of the defendant, and such other persons as the plaintiff or his attorney shall direct, as garnishees, to be and appear before our said court, at the time and place aforesaid, then and there to answer such allegations and interrogatories as may be exhibited against them; and have you then and there this writ.

IN TESTIMONY WHEREOF, the undersigned, Clerk of the said Jefferson Circuit Court, has hereto signed his name and affixed the seal of said Court, at office, this *19<sup>th</sup>* day of *December* 18*90*.

*W. S. Royce* Clerk.

*By O. The. Horine Deph*

I executed the within writ in Jefferson County Mo on the 19<sup>th</sup> day  
of December <sup>1870</sup> on L & H Alford as garnishee and also further on the 23<sup>rd</sup>  
day of December 1870 on Dr L James, Thos Bettle & Christopher  
and Wash Vinyard on each as garnishees and on A Mitchell  
agent of the  
St Louis & Iron Mountain railroad <sup>as garnishee</sup> on the 29<sup>th</sup> day of December  
1870 and on J B Dover as garnishee on the 4<sup>th</sup>  
day of January 1871 and I further on the 1<sup>st</sup> day of  
February 1871 executed the within writ on the within  
named defendant Clark Bullock by delivering  
to him a true copy of this writ & petition

John Williams Sheriff

No 4 2831

TO

Jefferson Circuit Court.

March Term, 1871.

Simon & Gregory.

Clark Bullock

(original)

Dr L James 27<sup>th</sup> Dec 1870

Thos Bettle 27

L & H Alford 19<sup>th</sup>

St Louis & Iron Mountain 29<sup>th</sup>

Wash Vinyard 29

J B Dover January 4

John Williams Sheriff

See \$8.00

H. L. Simons & Charles Gregory  
doing business under the name  
of H. L. Simons & Gregory — Plaintiffs  
Against  
Clark Bullock, Defendant,  
In the Circuit Court of  
Jefferson County, Missouri

Now Comes the said Defendant, and for  
plea in the nature of a plea in abatement,  
denies the truth of the facts alleged in the  
Affidavit, on which the said attachment  
was sued out, — And Defendant denies that  
he has fraudulently conveyed his property  
so as to hinder or delay his Creditors, — and  
denies that he was at the Commencement  
of this suit, or that he is now, a non-res  
ident of the State of Missouri, —

Wherefore said Defendant prays that  
said attachment may be abated at the  
Costs of the Plaintiff.

Abner Green  
Attorney for Defendant

In Circuit Court  
Jefferson County

Simon & Daany  
vs,  
Clark Burbeck

Plea in Abatement

Filed Mar 21<sup>st</sup> 1871  
W. S. Boyce cl

## ALLEGATIONS AND INTERROGATORIES IN SUIT BY ATTACHMENT.

*S. Simon & Gregory* Plaintiff,  
vs.

*Clark Bullock* Defendant.

In the *Jefferson Cir Court*  
*March* Term, 18*77*

According to the Form of the Statute In this behalf made and provided, the Sheriff of *Jefferson* County has summoned as Garnishee in the above case, the following named person, to wit: *Dr Louis James, Thomas, Belton J. B. Sower, Caleb Christopher, L. H. Alford, Wash Vineyard,*

and thereupon the Plaintiff *do* come and allege that said garnishee *has*, and at the time *he* was summoned as such garnishee, had in *his* possession, custody and charge, divers lands, tenements, goods, chattels, moneys, credits and effects of the said Defendant, of the value of *One thousand* Dollars; and also at the same time was, and now is, indebted to the said Defendant in a large sum of money, to wit:

*five hundred* Dollars.

AND THE PLAINTIFF EXHIBIT THE FOLLOWING INTERROGATORIES, to be answered by *each of them* *the*, said garnishee, according to law, to wit:

1st. At the time you were summoned as garnishee, had you, or have you since that time had, or have you now, in your possession, custody or charge, any lands, tenements, goods, chattels, moneys, credits or effects, belonging to the Defendant *Clark Bullock*.  
If yea, state what they were, or are, and their value; if lands or tenements, a full description of them; and if goods, chattels, moneys, credits or effects, how they came into your possession, custody or charge.

2d. At said time were you, or have you since become, or are you now, in anywise indebted to the Defendant *Clark Bullock*?  
If yea, state to what amount, in what manner the debt accrued, any instrument of writing by which it was evidenced, what has become of such instrument, and whether, to your knowledge, it was in the possession or under the control of the Defendant *Clark Bullock* or of his *agent* at the time, or after you were summoned as garnishee.

~~3d. At said time were you, or have you since become, or are you now, bound in any contract to pay the Defendant money, which is not yet due? If yea, state the nature of such contract, the amount thereof, and when the money to be paid under it was, or is to become due and payable~~

*Wischer, Thomas & Thomas*  
*Attys for Plaintiff*

S. S. Simon & Gregory  
against  
Clark, Bullock

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Interrogatories to  
L. James, Thos Bettle  
J. B. Dover, C. Christopher  
L. H. Alford & Nash Vineyard

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Filed Mar 21<sup>st</sup> 1871  
W. S. Boyce Ck

S. J. Simon & Gregory Pla } In The Jefferson  
against } B. Cir. Court  
Clark Bullock def. & } March Term  
Louis James Garnishee } 1871

Now at this day comes Louis  
James Garnishee, and for answer  
to 1<sup>st</sup> Interrogatory filed says that  
he did not have when Garnisheed any  
lands, tenements, goods, chattels, moneys,  
credits or effects belonging to defendant,  
In answer to the 2<sup>d</sup> Interrogatory filed  
says I was indebted to defendant  
in the sum of Thirty dollars secured  
by note

Subscribed & sworn to } I James  
before me this 21 day }  
March 1871

W. S. Boyce Clerk,  
By J. H. Horn Dept

S. T. Simons Gregory  
vs.  
Clark H. Bullock

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Answer of  
L. James Garrison

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#30

Filed Mar 21<sup>st</sup> 1871  
W. S. Boyce Cl

St. Simon & Gregory Pla. } In the Jefferson  
against } Circuit Court  
Clark Bullock Defr } Mar Term 1871  
Thomas Bettle Garnisher }

Now at this day comes  
Thomas Bettle Garnisher in the  
above entitled cause, and for  
answer to first Interrogatory says  
when Garnished he did not have any  
tenements, lands, goods, chattels, credits  
effects, belonging to defendant.

In answer to 2<sup>d</sup> Interrogatory says  
I was at the time of the service of  
the Garnisher upon me, indebted to  
defendant in the sum of Three & —  
55  
100 dollars, or acct,

subscribed & sworn } Thomas Bettle  
to before me this 21 }  
day of March 1871 }  
J. S. Dwyer Clerk,  
By The Home Dept.

S. T. Simon & Gregory  
vs

Clark Bullock

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Answer of  
Thos Pettie Garnisher

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4855

Filed Mar 21<sup>st</sup> 1871  
W. S. Boyce Clk

S. J. Simon & Gregory Pla } In the Jefferson  
 against } County Cir. Court  
 Clark Bullock Deft. & } March Term  
 C. Christopher Garnisher } 1871

Now at this day comes  
 C. Christopher Garnisher in the  
 above entitled cause and for answer  
 to first Interrogatory says at the time  
 I was summoned as Garnisher in  
 the above entitled cause I did  
 have money in my hands belonging  
 to Clark Bullock the defendant  
 to the amount of Twelve <sup>60</sup>/<sub>100</sub> dollars  
 that I had collected for him  
 for which services I was to have  
 ten per cent for collecting the same,  
 says he has nothing else in his  
 hands belonging to the said  
 Clark Bullock

In answer to 2<sup>d</sup> Interrogatory he  
 says that he did not owe Clark  
 Bullock anything except as above  
 stated

C. W. Christopher

Subscribed before me }  
 the 22<sup>nd</sup> March 1871

W. J. Boyce Clerk }  
 By C. H. Haines Deft.

S. T. Simon & Gregory  
against  
Clark Bullock  
answer of  
Re. Christopher  
Garnish

\$ 12<sup>60</sup>

money col by him

Filed Mar 22 1871

W. S. Boyce cl

H. J. Semow & Chas. R. Gregory

vs

Clark Bullock

In the Circuit  
Court of  
Jefferson County  
Missouri

Now at this day the Defendant comes  
and says that it is not true as  
is alleged in plaintiffs affidavit  
that the Defendant has now  
or had prior to the time of the  
commencement of this suit  
fraudulently conveyed his property so as  
to hinder and delay his creditors  
neither is it true as in said  
affidavit is alleged that the  
Defendant has now or had  
when this suit was commenced  
become a non resident of the  
State of Missouri and denies  
that he now is or was when  
this suit was commenced a  
non resident of the State of  
Missouri

Sworn to and  
Subscribed before  
me this March 22<sup>nd</sup> 1871  
W. F. Boyce Clerk  
By O. H. Hornum Deft

Clark Bullock

Simon Blal

by

Clark Bullock

Pleas in attem

Billed Mar 22 1887

M. D. Burpee

S. T. Siman & Gregory Pla. } In The Jefferson  
 against } County Circuit  
 Clark Bullock def. } Court March  
 L. H. Alford Garnisher } Term 1871

Now at this day comes  
 L. H. Alford who has been Garnished  
 in the above cause says in answer  
 to 1<sup>st</sup> Interrogatory filed that he did  
 not have any lands, tenements, goods  
 Chattels, money, credits or effects, or  
 credits in his possession at the  
 time said Garnisher was served  
 or since

In answer to the second Interrogatory  
 filed says he owed Clark Bullock  
 at the time of the service of the  
 Garnisher the sum of Two hundred  
 and twenty five dollars,

subscribed & sworn  
 to before me this

22<sup>d</sup> day of March 1871

W. S. Boyce Clerk

By C. Tho. Heavins Deft

L. H. Alford

Simon Gregory  
is  
Charles Bullock

LT Alfred  
Anson

Chile Mar 22 1871  
W J Bourne CB

S. T. Union & Gregory Pla. } In the Jefferson  
against } Co. Cir Court  
Clark Bullock Defr } March Term 1871.  
J. B. Dover Garnishee }

Now at this day comes  
~~Clark~~ <sup>J. B.</sup> Dover as Garnishee in the above  
entitled cause and for answer to  
1<sup>st</sup> Interrogatory filed says that at  
the time he was served as Garnishee that  
I did not have anything mentioned in  
this interrogatory  
In answer to 2<sup>d</sup> Interrogatory says  
at the time he was served as Garnishee  
that I owed Clark Bullock the  
sum of 20<sup>80</sup>/<sub>100</sub> dollars  
Subscribed & sworn  
to before me this 22<sup>nd</sup> J. B. Dover  
day March 1871  
W. S. Boyce Clerk

S. T. Simon & Gregory  
against  
Clark Bullard

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answer to  
J. B. Souther  
Garnish

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20 <sup>80</sup>

Filed March 22. 1871  
W. S. Boyce cky

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# The State of Missouri,

COUNTY OF JEFFERSON.

To

Geo Stephens

You are Herely Commanded, That setting aside all manner of excuse and delay, you appear before our Circuit Court, for the County aforesaid, on the 27<sup>th</sup> day of March 1877, 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

James A. Berger, Plaintiff, and Clark Bullock;

Defendant, on the part of *Defendant*; and herein you are in no wise to fail.

*Witness* ~~Witness~~, **ELIAS F. HONEY**, Clerk of our said Court, with the seal thereof hereto affixed, at office, this

A. D. 187

*E. F. Honey* Clerk.

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# SUBPOENA

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RETURNABLE TO  
JEFFERSON CIRCUIT COURT.

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Mar

Term, 1871

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Simon & Gregory

vs

Clark Bullock

Geo Stephens

John Williams

Sheriff fees .50

The State of Missouri,  
COUNTY OF JEFFERSON.

Do Louis H. Ward

You are Herby Commanded, That setting aside all manner of excuse and delay, you appear before our Circuit Court, for the County aforesaid, ~~on the~~ *Fourth next*

, 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

*Simon J. Rogers* are  
Plaintiff, and *Levan Russell* is

Defendant, on the part of *Defendant*; and herein you are in no wise to fail.

*Witness* *W. J. Honey*,  
Clerk of our said Court, with the seal thereof  
hereto affixed, at office, this *23rd* day of

*March* A. D. 1871

*W. J. Honey* Clerk.

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# SUBPOENA

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RETURNABLE TO  
JEFFERSON CIRCUIT COURT.

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March Term, 1877

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Simon Gregory  
vs  
Clark Bullock

J. H. Alford

Served 23

John. Williams  
Sheriff fees .50

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