

March 1871, No. 32

White, Julia H.

VS

Dodrick, John S.

White, James M.

White, Laura, W

White, Nathaniel

et al

Partition

500 acres in S2, 3, 10, 11 T39 R3E;
other defendant Moses F. White

Julia A White Plaintiff

vs

John S. Deadrick

James M. White

Louisa H. White

Nathaniel S. White

and Moses F. White

Defendants

In the Circuit Court of
Jefferson County Mo.

The plaintiff states that she and all of the defendants except John S. Deadrick are the Children of Moses F. White, hereinafter named, that on or about the 15th day of June 1859 one Louis Bolduc conveyed the following described tract or tracts of land, to one Ferdinand Kemmelt and the said defendant Deadrick in trust for the sale and separate use of the said Moses F. White the father of the plaintiff and defendants except Deadrick during his natural life and to the Children of the said Moses in fee after his death; that is to say the West half of the South East Quarter of section three (3) and the East Half of the North East Quarter of section ten (10) containing together one hundred and sixty eight $\frac{37}{100}$ acres, Also the North West Quarter of North East Quarter of section ten (10) containing forty two $\frac{8}{100}$ (42 $\frac{8}{100}$) acres; Also the West half of the South West Quarter of section two (2) containing eighty ^{five} $\frac{85}{100}$ acres, Also the North East Quarter of the South East Quarter of section three (3) containing forty two $\frac{15}{100}$ (42 $\frac{15}{100}$) acres. Also Lot No one (1) of the North East Quarter of section three (3) containing eighty ⁽⁸⁰⁾ acres. Also the North East Quarter of the South

(85 $\frac{66}{100}$)

East Quarter of section ten (10) containing forty two (42) acres, and the West half of the South West Quarter of section eleven (11) containing forty (40) acres, lying and being in township thirty nine 39 Range three (3) east and containing in the aggregate five hundred & $\frac{2}{100}$ (500 $\frac{2}{100}$) acres, in Jefferson County in the State of Missouri and known as the Boland Farm on the banks of Big River.

Plaintiff further states that sometime after the making said conveyance by said Boland in trust as aforesaid, the life estate of said Moses F. White was sold under execution and purchased by said Ferdinand Kinneth for the use and benefit of the said Children of said Moses F. White; that before said Kinneth had made to them in trust as aforesaid a deed for said property he died and the legal title to said life estate of said Moses ascended to said Kinneth's widow and Children, who on or about the day of February or March 1870 conveyed the said life estate to said John S. Deadrick in trust for the Children of said Moses.

Plaintiff further states that said Ferdinand Kinneth having died as aforesaid, the said John S. Deadrick is the only surviving trustee of said trust, who holds the legal title of said real estate for the use of this plaintiff and her brothers and sisters Co defendants with said Deadrick. Plaintiff therefore avers that the said real estate is held by the plaintiff and the children

of said Wives & Co defendants aforesaid
as tenants in common, that each of said
parties is the owner of in fee and interest
in said several tracts or parcels of land
to the extent of one fifth ($\frac{1}{5}$).

Plaintiff further states that said defendants
are all minors, and she prays the Court
to appoint for them a guardian ad litem
to represent them in this suit -

Plaintiff prays the Court to decree a
partition of said land between the said
parties in interest if the same can be done
without prejudice to the owners, & if not that
the same may be sold and for a division
of the proceeds thereof among the parties
according to the respective rights and interests,
and for such other and further relief as to
the Court may seem meet & proper.

Philip Pipkin

Atty for the Plff.

Philip Pipkin makes oath and says that the
 foregoing petition and the matters therein
as stated he believes to be true.

Sworn to & subscribed Philip Pipkin
before me Feby 3
1871. 3

Jefferson Circuit Court
March Term 1871

Julia A. Smith

vs

John S. Macdonald & the

Parties for Partition of
Land

Return
entry

Filed July, 13th 1871

Wm. Dyer Clerk
By Geo. H. Bond del

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 *John S Deadrick*
James M White Louisa W White
Nathaniel S White & Moses D White

if ~~he~~ be found in your County, that ~~he~~ be and appear before the Honorable 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 *first*
~~Monday~~ *After the fourth* Monday of *March* next, then and there
to answer unto *Julia A White*

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

Witness, W. S. BOYCE, Clerk of our said

Circuit Court, with the seal thereof hereunto af-
fixed, at office in Hillsboro, this *thirtenth*
day of *February* A. D. 1871,

W S Boyce
Clerk Circuit Court.

By

C M Haines
Deputy.

2817

No 32

RETURNABLE

TO

JEFFERSON CIRCUIT COURT.

March TERM, 1871.

John S. White

John S. Deadrick

James M. White

Laura M. White

Nathaniel S. White

Moses L. White

(Original)
Judgment
val to \$ 307

William S. H. fee 3.00

I executed this writ in Jefferson County Mo on the 10th day of February 1871 on John S. Deadrick by delivering to him a true copy of the within writ and petition and on the same day by delivering a true copy of ^{this} writ to James M. White and on Laura M. White by delivering a true copy of this writ and on Nathaniel S. White and Moses L. White by delivering to each of them a true copy of this writ

John Williams Sheriff

By J. B. Mot
Deputy