

Todderson County Circuit Court
Vice C. les - Civil
September 1872

Roll

30 Folder 13

Donnell, Cynthia
vs
Crawford, Samuel W.

Debt, account

Debt \$419.60 for cash, cord
wood, board

1869
Oct. 4th

Deemed W. Sanford

Dr

Debitia Cornell

To balance on statement - for cash = 260.00
" interest on same @ 10 % by agreement
to August 4th 1872 43.60

1869

" balance due on acct. for cord wood
at hauling on settlement -

\$8.00

1869

" amt. due for board of work hand for
David Bradford of Wells @ \$4.
pr. week

Total due \$499.60

Filed Aug 10 1872
W S Boyce Clerk

Cynthia Donnell, Plff. vs Samuel W. Crawford, Deft. } In the Circuit Court of Jefferson County, Missouri

Plaintiff avers that Defendant owes her Four Hundred & nineteen Dollars & six-cents the particulars of which appear by an account herewith filed, that the item of said account for Two Hundred & six Dollars is for Cash due Plaintiff on Settlement by the Defendant on the 4th of October 1869 upon which Defendant agreed to pay Plaintiff ten per cent interest amounting up to the 4th of August 1872 to \$73.60 interest & making the amount due on that item \$333.60⁰⁰ and Plaintiff says that the item in said account of \$58.00 was agreed upon as being due Plaintiff by Defendant on a Settlement between them at a Settlement period in said year 1869 subsequent to the Settlement aforesaid made on the 4th of October which sum was due her by Defendant for Cord wood & hauling done ^{for} & furnished to Defendant at his request, and that said item of \$28.00 is due Plaintiff for seven weeks board furnished John Lynes a Carpenter in the employ of Defendant in said year 1869 at the request of Defendant

Synthia Donnell
vs

Samuel W. Crawford
action on account
original

Filed Aug 10th 1872
W. S. Price
Clk

issue process with
copy of act.
Williams
for Plaintiff

for which he agreed to pay & which
was reasonably worth \$4.00 per
week - said items amounting in the
aggregate to \$416.60 for which she
asks judgment

Jos. J. Williams,
Atty. for Plaintiff

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

THE STATE OF MISSOURI,

TO THE SHERIFF OF THE COUNTY OF JEFFERSON—GREETING:

We command you, that you summon

Samuel W Crawford

*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 Second Monday after the fourth Monday
of September next, then and there to answer unto*

Cynthia Donnell

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

W. S. Dryce
Witness, **ELIAS F. HONEY**, Clerk of our said
Circuit Court, with the seal thereof hereunto affixed,
at office in Hillsboro, this Tenth
day of August A. D. 1877

W. S. Dryce Clerk Circuit Court.
By *Chas. H. Corine* Deputy.

I executed the within Summons at the
county of Jefferson State of Missouri
on the 17th day of August 1872 by leaving
a true copy of the original writ and annexed
petition as furnished me by the clerk at
his usual place of abode with a free white
person a member of his family of over the
age of fifteen years

J. B. Moss Sheriff
By J. A. Williams

35-12

RETURNABLE

\$37.02

JEFFERSON CIRCUIT COURT.

Sept. Term, 1872

Samuel W. Crawford Plaintiff

AGAINST

Samuel W. Crawford Defendant

Original

sheriff fees \$1.00
August 17

521.378 15.58

In Circuit Court Jefferson County
Cynthia Council

Plaintiff

Against

Samuel W. Crawford

Defendant

The defendant Samuel W. Crawford in answer to the Petition of the above-named plaintiff denies that he owes the plaintiff four hundred and ~~sixty~~ nineteen dollars and sixty cents and denies that he owes said plaintiff any sum whatever and denies that he is indebted to said plaintiff in any sum or amount mentioned and named in her bill of particulars filed with said petition. And the defendant further denies that the item in her account mentioned and filed in her petition for two hundred & sixty dollars is for cash due plaintiff on settlement by the plaintiff on the 4th of October 1869 or at any other time and the defendant denies that he agreed to pay plaintiff ten per cent interest ~~or~~ any interest whatever and denies that the sum he agreed to pay plaintiff and the interest thereon up to the 4th of August 1872 amounted to the sum of \$73.60 or that it amounted to any sum whatever And the defendant denies that the principal and ^{interest} due the plaintiff in the item

mentioned in her petition amounts to the sum of $333\frac{60}{100}$ or that it amounts to any other sum

And the defendant denies that the item in the account of the plaintiff of \$8.00 was agreed upon as being due plaintiff by defendant or that any other sum was

so agreed upon on a settlement between them at a period in said year in 1869 or at any other time and subsequent to the settlement mentioned as made on the 4th of October and denies that any settlement was made on the 4th of October or any other time as mentioned in

plaintiff's petition, And the defendant denies that any sum was due plaintiff for cord wood and hauling done for & furnished to defendant at his request and the defendant denies that said item of 28.00 is due plaintiff for seven weeks

board furnished John Lynes a Carpenter in the employ of defendant in said year 1869 or at any other time, at the request of defendant denies that he agreed to pay any sum for board furnished said John Lynes or anybody else or that he agreed to pay four dollars per week or any sum for board. And the defendant denies that he owes the plaintiff

The sum of \$419.60 or any other sum
and denies that she is entitled to judg-
ment for said amount or any other
sum

Wherefore he asks judgment for costs

Saml W Crawford

by
Sa Edmund

Atty

In Circuit Court
Jefferson County

Cynthia Connell

Plff

vs

Saul W Crawford

Def

Ans

81

Filed Jan 1st 1873

W. J. Boyce

By Thos Horne

Deft

STATE OF MISSOURI,
COUNTY OF JEFFERSON.

To *Chas E Harne*

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 *22nd* day *Jan'y* *1873*, 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 *Legnthin Dornel*

Plaintiff, and

Samuel W. Baird

Defendant, on the part of

Defendant

; and herein you are in no wise to fail.

Witness, W. S. BOYCE, Clerk of our said Court, with the seal thereof
hereto affixed, at office, this *15th* day of

Jan'y A. D. 1873.

W. S. Boyce Clerk.

State of Ohio
County of Cuyahoga

I Return this to S. H. Marshall
being found in my County this the 15th day
of Jan^r 1829

J. O. G. Photo Studio

C. Donnell
vs
S. H. Crawford

C. S. Harnes

Shiriff Fee, 25

Cynthia Donnell } In the Circuit
m } Court of
J. W. Crawford } Jefferson County
Missouri

Now at this day comes the
Defendant and moves the
Court to strike out the
Defendants answer for the
following reasons, To wit,

1st Because the same
was not filed within the
time allowed by Law or
within the time required by
a Rule of this Court fixing
the time within which said
Defendant was required to
answer, — ~~Joseph Williams~~
~~Att'y for Plaintiff~~

2nd Because said answer
was filed after the expiration of
the time within which defendant
was required by Law and the rule
of this Court to answer & without
Leave of Court so to do

Atty. for Plaintiff

Donnell

(m)

Crawford

Motion to
Strike out
answer

Filed May 13 1873

W. B. Rouse clerk

Cynthia Cornell
 Plaintiff
 against
 Samuel W. Crawford
 Defendant

In Circuit Court
 Jefferson County
 Sept Term 1873

The defendant Samuel W. Crawford represents to this Court that he is the defendant in the above entitled cause now pending in this Court, that said cause has been pending and at issue in this Court for some time, prior to this application. And he now comes & petitions the Court to change the venue in said action to some other County in this Circuit for the reason that the inhabitants of Jefferson County are prejudiced against this applicant. And the petitioner further states that the knowledge of the fact that the inhabitants of the County were prejudiced against him came to him on Tuesday the 9th day of September 1873 and since the adjournment of the last regular term of this Court and since this term of Court commenced its session on Monday the 8th day of September 1873.

Wherefore your petitioner prays that this case may be removed to some other County in this Circuit where the causes alleged do not exist.

S. W. Crawford

State of Missouri }
Jefferson County } S.S.

Samuel W. Crawford
being duly sworn says that he is the petitioner
mentioned in the foregoing petition and the
defendants in the action therein mentioned,
and that the facts therein stated are
true to the best of ~~his~~ his knowledge &
belief and that the knowledge of the
existence of ~~the~~ the cause therein alleged
first came to the defendants since the
adjournment of the last ~~reg~~ regular term
of this Court and on Tuesday the 9th day
of Sept 1873 after the present term of this
Court commenced, and the deponent says
that by reason of the premises he has
just cause to ~~believe~~ believe he cannot
have a fair ^{in this County} trial on account of the
causes alleged.

Subscribed & Sworn } S. W. Crawford
to before me this 10th }
day of Sept 1873 }

H. A. Boyce Clerk

By C. H. Kerne Sept.

Cynthia Donnell
Plff
vs
Samuel W Crawford
Def

— " —
Petition & Affid
for Change of name
— " —

Filed Sept 10th 1873
W S Boyce cler

Cynthia Donnell
vs
S. M. Crawford } In Civ^l Court,

Plff. objects to the application for change
of Venue by deft. because

1st Defendant has not shown by
any facts or circumstances which
should be satisfactory to the
Court that the facts in his petition
are true or that he can not
have a fair trial here, on their act,
for which reasons the application
should be refused. - Williams
for plff.

Donnell
Crawford

Obj. to Change
of venue

Filed Sept 11 - 1873
W. S. Boyce clk

No.

3512

Jefferson Circuit Court.

September Term, 1872.

Cynthia Donnell

vs.

Samuel W. Crawford

Judgment,

-

-

\$

Date

18

Fee Book No.

1

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Judg't Docket,

Page

Plaintiff's Atty.

ATTORNEYS: Exercise care and return promptly.

C. F. Chamberlin & Co., Printers and Stationers, St. Louis.