

Jefferson County Circuit Court
Case Files-Civil
January 1873

Box

30 Folder 30

Hurtgen, Josephine
vs

Hurtgen, Joseph

Divorce

Married August 28, 1861 in
Detroit, MI; Abandonment,
abuse

Josephine Hurtgen, - Plaintiff } In the Circuit
 Against } Court of Jefferson
 P. Joseph Hurtgen, - Defendant } County, Missouri
 } January Term 1873,

The Plaintiff states that on the 38th day of August 1861, in the City of Detroit in the State of Michigan, she was lawfully married to the Defendant; that she continued to live with the Defendant, as his wife, from and after the day and year aforesaid, until about a year last passed, - that during all that time Plaintiff faithfully demeaned herself and discharged all her duties as the wife of Defendant, and treated him at all times with kindness and affection; but that the Defendant, wholly disregarding his duties as the husband of Plaintiff, became at times very quarrelsome and abusive towards Plaintiff. That he encouraged his children by a former wife, to treat Plaintiff with contempt, and by repeated acts of abuse, he tried to drive Plaintiff away, and to abandon him, - that he often, when in a violent rage would threaten to drive Plaintiff off, telling her he was tired of her and wanted to get rid of her, and that he by numerous acts of disrespect and contempt showed that he was laboring to compel Plaintiff to leave him, And Plaintiff states that the Defendant, by all these acts of disrespect, abuse, and contempt manifested

Against Plaintiff, has offered her such indigni-
ties as to render her Condition intolerable, And
Plaintiff states Defendant about a year since
went off, and left Plaintiff unprovided for,
- that he has entirely abandoned Plaintiff, and
gone to parts unknown, leaving her ^{but little} means
of support, - but to rely upon her own labor,
for her support and the maintenance of
three small children, one an infant, - and
that he has without a reasonable cause, ab-
sented himself from Plaintiff for the space
of one year. Plaintiff states that there was
born of the marriage aforesaid three children
now of tender years, left with Plaintiff
to provide for, Plaintiff further states
that she has resided in this State one whole
year next before the filing of this Petition.

The Plaintiff therefore for the causes
herein stated, prays to be divorced from the
bonds of matrimony contracted with the De-
fendant as aforesaid; that she may have
the Care and Custody of her three infant chil-
dren, and that the Court will make such
further orders and judgments touching the
Premises as may be just and proper.

Abner Green
Attorney for 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 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 that the Defendant is a non-
resident of the state of Missouri
sworn to and subscribed Josephine Hurtgen
before me, Oct 17 1872

W. S. Boyce Clerk
V. The Home Dep.

3554

In the Circuit Court
Jefferson County

Filer's fee and sub.	40
order to printer	35
copy	50
copy	1.00
affid.	.25
defendant	35
decrees	50
prob.	10
costs	20
copied decrees	100
	4.55
defendant	
	20
	4.75

Josephine Hurtgen
vs.
P. Joseph Hurtgen

Petition
for Divorce

The clerk will make
order of publication
A. S. S. S.
for P. S. S.

Filed Oct. 16 '82
W. S. Boyce, clerk
By O. H. Harris
Deputy