

Jefferson County Circuit Court
Case Files-Civil
January 1875-No 12

Box

33

FOLDER 41

Loose, Margaret

VS

Loose, John

Divorce

Married June 8, 1862 in
Peoria, Illinois; Separated
December 8, 1874 due to
abuse; 4 children born;
drunkenness

Margaret Loose, Plaintiff } In the Circuit
Against } Court of Jef=
John Loose, Defendant, } ferson County
Missouri
January Term 1875

The Plaintiff states that on the 8th day of June 1862, in the County of Peoria in the State of Illinois —, she was lawfully married to the Defendant, that Plaintiff continued to live Defendant ^{as his wife} from and after the day and year aforesaid, until the 8th day of December 1874; that during all that time Plaintiff faithfully demeaned herself and discharged all her duties as the wife of the Defendant, and at all times treated him with kindness and affection; but, that the Defendant, wholly disregarding his duties as the husband of Plaintiff, soon after said marriage became very much addicted to intemperance and when intoxicated he was very abusive and quarrelsome. And the Plaintiff states that on the 8th day of December 1874, the Defendant being in a state of intoxication and without any provocation, got into a violent rage at Plaintiff, and drew a hatchet and threatened her life, and that he then and there seized Plaintiff by the throat and choked her severely, and struck her with his fists, and kicked her and greatly abused her,

And the Plaintiff therefore charges that the Defendant has been guilty of such cruel and barbarous treatment towards Plaintiff since the marriage aforesaid, as to endanger her life; and the Plaintiff further states that the said Defendant has been addicted to habitual drunkenness for the space of one year and upwards, since the marriage aforesaid; and the Plaintiff further states that the Defendant has offered such indignities to Plaintiff since the marriage aforesaid, as to render her condition intolerable, - Plaintiff further states that there was born of the marriage aforesaid four children, now all of tender years, - Plaintiff states that she has resided within this State for one whole year next before the filing of this petition, and ^{that} the Causes for divorce aforesaid all occurred within this State.

The Plaintiff further states that the Defendant is seized and possessed of personal property of the value of three hundred dollars, and that Plaintiff is without any means of support, or for the prosecution of this suit,

The Plaintiff therefore prays to be divorced from the bonds of matrimony contracted as aforesaid with the Defendant; that she may have the care and

and custody of her said infant children, - and that the Court will adjudge to her such support and maintenance out of the property of the Defendant as the Court may deem just and reasonable, and may restore the Plaintiff to her maintenance, and to grant such further orders and judgments as may be just and proper

Margaret Loosé
By Abner Green, her
Attorney;

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 the 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.

Wm. Garrison Lee

Sworn to and subscribed
before me this 11th day
of December 1874

Stephen Pounds Justice of the Peace
for the County aforesaid

In Circuit Court
Jefferson County

Margaret Loose
v.

John Loose

Petition for Divorce

Issue Summary

H. Green

for D. H. H.

Filed Dec. 12th 1874

W. J. Boyce

D. C. H. H. H. H.

#2. charges to Green

Margaret Loose plaintiff } In the Circuit Court
against } of Jefferson County
John Loose defendant, } Missouri.

January Term 1875.

The Plaintiff states that on the 8th day of June 1862, in the County of Peoria in the State of Illinois, she was lawfully married to the defendant; that plaintiff continued to live — defendant as his wife from and after the day and year aforesaid, until the 8th day of December 1874; that during all that time Plaintiff faithfully demeaned herself, and discharged all her duties as the wife of the defendant, and at all times treated him with kindness and affection, but, that the defendant, wholly disregarding his duties as the husband of Plaintiff, soon after said marriage became very much addicted to intemperance, and when intoxicated, he was very abusive and quarrelsome, And the plaintiff states that on the 8th day of December 1874, the defendant being in a state of intoxication, and without any provocation, got into a violent rage at plaintiff, and drew a hatchet and threatened her life, and that he then and there seized plaintiff by the throat and choked her severely, and struck her with his fists and kicked her and greatly abused her, And the Plaintiff

therefore charges that the defendant has been guilty of such cruel and barbarous treatment towards plaintiff since the marriage aforesaid, as to endanger her life; and the plaintiff further states that the said defendant has been addicted to habitual drunkenness for the space of one year and upwards, since the marriage aforesaid; and the plaintiff further states that the defendant has offered such indignities to plaintiff since the marriage aforesaid, as to render her condition intolerable, Plaintiff further states that there was born of the marriage aforesaid four children, now all of tender years, Plaintiff states that she has resided within this State for one whole year next before the filing of this petition, and that the causes for divorce as aforesaid all occurred within this State.

The plaintiff further states that the defendant is seized and possessed of personal property of the value of three hundred dollars, and the plaintiff is without any means of support, or for the prosecution of this suit.

The plaintiff therefore prays to be divorced from the bonds of matrimony contracted as aforesaid with the defendant, that she may have the care and custody

of her said infant children, - and that the
court will adjudge to her such support
and maintenance out of the property
of the defendant, as the court may deem
just and reasonable and may restore the
Plaintiff to her maintain (maiden) name
and to grant such further orders and
judgments as may be just and proper.

Margaret Loose

By Abner Green her Attorney,

This affiant the plaintiff, makes oath and says that
the facts stated in the above petition are true accor-
ding to the best knowledge and belief of the Plain-
tiff, 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.

Sworn to and Margaret Loose
subscribed before me
this 11th day of December 1874,

Stephen Pounds Justice of the Peace for the County of Warren
A true copy of the original petition.

In Testimony whereof I have hereunto set my
hand and affixed the seal of said court at office
in Hillsboro December 17th 1874

W. S. Bryce Clerk

By Chas. Horne Deft

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 Loose

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 *January* next, then and there to answer unto

Margaret Loose

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 affixed, at office in Hillsboro this *17th* day of *December* A. D. 18*74*

W. S. Boyce

Clerk Circuit Court.

By

Chas. Moore

Deputy

RETURNABLE

TO

JEFFERSON CIRCUIT COURT.

January TERM, 1873.

Margaret Loose

v

John Loose

copy for receipt

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 Loose*

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 *January* next, then and there to answer unto

Margaret Loose

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 affixed, at office in Hillsboro this *17th* day of *December* A. D. 18*74*

W. S. Boyce Clerk Circuit Court.

L. H. Horne Deputy

I Return this. Summons John Luce not
found in my County Dec 25 1874

J B Mop Shuff

174053

RETURNABLE

TO

JEFFERSON CIRCUIT COURT.

January TERM, 1875.

Margaret Louse

vs

John Louse

original