

Jefferson County Circuit Court

Box 9 Folder 58

Civil Case - Civil

April 1858, #16

Jackson, James M.
vs

Jackson, Susan

Divorce

Married 1852; abandonment

James M Jackson }
vs } In the circuit court
Susan Jackson } of Jefferson County
Missouri

Plaintiff states that in the year 1852, he and defendant were lawfully married at Jefferson County Missouri.

Plaintiff & defendant lived together as man and wife about four months when plaintiff desired defendant to go with him to house keeping. She utterly refused to live with plaintiff but staid with her father who would not suffer plaintiff to live ^{there} with his wife. So plaintiff complains charges that defendant has abandoned her self without a reasonable cause for the space of two years from the plaintiff before the commencement of this suit.

The plaintiff, therefore prays the court to grant him a divorce from the bond of matrimony contracted as aforesaid and for all such other orders as may be proper
J A Deal for plaintiff

State of Missouri }
County of Jefferson } ss

This 17th day of March 1858
James M Jackson makes oath & says that the facts stated in the above petition are true, according to the best knowledge & belief of plaintiff & that the complaint is not made out of ~~the~~ ^{the} necessity or by collusion, fear or restraint between plaintiff and defendant for the mere purpose of being separated from each other, but in sincerity & truth, for the causes mentioned

in the petition.
Subscribed & sworn to
before me this 17th day
of March 1858

James M. Jacobs

Elias J. Honey Clk

James Jackson
or J. Pettie

Seaman's Jackson

Albion, N.Y. 1818

Albion & Honey
Creek

26th Dec. 1818	
26th -	100
26th -	120
26th -	25
26th -	10
26th -	73.05

James M Jackson } In the Circuit Court
vs } of Jefferson County
Susan Jackson } Missouri

Plaintiff States that in the year 1852, he and defendant were lawfully married at Jefferson County Missouri. Plaintiff & Defendant, lived together as man and wife about four months, when plaintiff desired defendant, to go with him to housekeeping, she utterly refused to live with plaintiff, but staid with her father, who would not suffer plaintiff to live there with his wife, so plaintiff charges, that defendant, has absented herself without a reasonable cause for the space of two years from the plaintiff before the commencement of this suit: The plaintiff therefore prays the Court, to grant him a divorce from the bonds of matrimony contracted as aforesaid and for all such other orders as may be proper.

J A Beal for Plaintiff

State of Missouri }
County of Jefferson } This 17th day of March
1858. James M Jackson makes oath & says
that the facts stated in the above petition are true, according to the best knowledge and belief of plaintiff & that the Complaint is not made out of levity, or by collusion, fear or restraint, between plaintiff and defendant, for the mere purpose of being separated

from each other. but in Sincerity & truth for
the causes mentioned in the petition
Subscribed & sworn to
before me this 17th day of } James M Jackson
March 1858
Elias D. Honey clerk }

Endorsed, "Filed March 17th 1858"
Elias D. Honey clerk

A true copy of the original petition
and affidavit on file in my office

In Testimony whereof I here to
set my hand and affix the Seal
of said Court at office March
23^d 1858.

Elias D. Honey clerk

COUNTY OF JEFFERSON, SS.

The State of Missouri.

To the Sheriff of the County of Jefferson--Greeting:

We command you, that you summon Susan Jackson

----- if she be
found in your County, that she be and appear before the Hon.
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 fourth Monday of April
next, then and there to answer unto James M Jackson

upon his original petition, a copy whereof is herunto annexed and
accompanies this writ--and have you then there this writ.

Elias J Honey

Witness, ~~THO. C. FLETCHER~~, Clerk of our said Circuit
Court, with the seal thereof hereto affixed, at
office, in Hillsboro, this 23^d
day of March A. D. 1858

Elias J Honey

CLERK CIRCUIT COURT.

I Executed the within writ at the County of Jefferson
on the Ninth day of April 1858 by delivering to Susan
Jackson a true copy of the within writ and the annexed
petition (as furnished by the Clerk)

Augustine Wiley Sheriff

No 16

Jefferson Circuit Court

April Term 1858

James M. Jackson

vs } Summons

Susan Jackson

Sheriff fees \$1.00

Filed April 12th 1858

Elias J. Honey
Clerk