

Jefferson County Circuit Court
Case Files - CIVIL
October 1858, No. 4

Box 10 Folder 25

King, Robert A.
Nickerson, Edmon A.

v.

Blennerhasset, Theresa M. adm.
Blennerhasset, Richard S.
Martin, George W.
Martin, Sarah Annie, et al

Set Aside Deed

40 acres in S20T39R4E; Bill of exceptions;
Supreme Court; Other Defendants: Alice
Joseph Blennerhasset, Theresa Boudicia
Blennerhasset, and Richard Byron Blennerhasset,
Edward W. Blennerhasset; deeded by
Nelson Cross to Richard S. Blennerhasset
for payment of legal services defending
Cross in murder trial in St. Louis

Robert A. King and
Edmond A. McKerson Esq.

Against
Theresa M. Blennerhasset
Admrx. of the Estate of Richard
S. Blennerhasset decd,
Theresa M. Blennerhasset
George S. Martin and Sarah
Annie his wife, Edward M.
Blennerhasset and Alice
Josephine, Theresa Roache
and Richard Byron Blen
nerhasset Minor heirs of
Richard S. Blennerhasset
deceased.

In the Circuit Court
of Jefferson County Missouri.
Oct. Term 1838.

Plaintiffs, State, That Some time
in the Year 1837, a certain Nelson
Crop was inducted by the Grand
Jury for the body of the County of
Jefferson Mo. for the wilful mur-
der of one William S. McDonald.
That the Said Nelson Crop. then in
the Custody of the Sheriff, employed
Richard S. Blennerhasset Esq. of
Saint Louis Mo. to attend to
and defend his cause until its
final termination, and agreed
as a Compensation for the afore
Said Services, to make a good
and Sufficient deed to the fol.

lownig descented Real Estate, lying
and being in the County of Jefferson
and State of Missouri, To Wit:
Beginning at the S. W. corner of N.
W. qr. of N. W. qr. Sec. 20 in Town
39 Range 4 E. thence North to the mouth
of La Marques Spring Branch to a
White Oak marked X thence
North Eastwardly up and along
a ravine called Bee Hollow to the
East boundary line of the South
West quarter of the S. W. qr. of Sec. 17
in T. 39 R. 4 E. thence S. to the S. E.
corner of the N. W. qr. of N. W. qr. of
Said Section No. 20 containing
forty acres more or less.

That in pursuance of Such Agree-
ment as aforesaid the Said Nelson
Crop together with A. S. Crop, Eliza
Crop, John B. Palmer, Elizabeth Palm-
er, John Parrish, Minnie Parrish
Serannah Ethridge, Agnes Eth-
ridge, Elizabeth Crop, Margaret
Crop, Elias Dobson and Louisa
Dobson all legal owners of Said
Land, did actually make, Execute
to and deliver to the Said Rich
and S. Blumhaffelt a good and
Sufficient deed to the Real Estate
above described, and conveyed
all their right, title and inter-
est ~~in~~ Said estate to Said Blum-
haffelt as a Compensation
for his Services to be rendered in

Said Case, Defendants further State that, when the Said Case was called for trial at the November term 1837 of the Circuit Court of Jefferson County, The Said Blenmerhassett appeared as Counsel and took a "Change of Venue" to the Circuit Court of Franklin County Mo. and a Special term thereof was held in January 1838. That, ^{at some} time before the holding of the Said Court and before the trial of the Said Case, the Said Blenmerhassett departed this life and consequently ^{in defending the Said Case} could not perform the Services, that he agreed to perform in consideration of the Real Estate Decided to him as aforesaid.

That at the Said Special term of the Said Court, the plaintiffs here employed by the Said Nelson Corp. to defend him upon Said Indictment, and as a Compensation for their Services, the Said Corp and the legal owners aforesaid agreed to make plaintiffs a good and Sufficient deed to the Said Real estate, which the Said Corp and his Cotenants had conveyed to the Said Blenmerhassett as a Compensation for his Services which he

promised to render in the cause,
And accordingly the Said Nelson
Crop together with the Said A. S.
Crop, Eliza Crop, John B. Palmer,
Elizabeth B. Palmer, John Parish,
Minerva Parish, Jeremiah Eth-
ridge, Agnes Ethridge, Elizabeth
Crop, Margaret Crop, Chas. Dobson
and Louisa Dobson all legal
owners as aforesaid, did con-
vey by deed to the Said plaintiffs
the above mentioned Real Estate
described as follows to wit: "The
following described Real Estate
lying and being in the County
of Jefferson, State of Missouri
and numbered as follows
To wit, part of the S. N. 4 of S. N. 4
of Section Seventeen (17) and part
of N. N. 4 of N. N. 4 of Section Twenty
Two of township Thirty Nine (39)
Range four East containing in
all about forty acres, and be-
ing the same piece of Land
heretofore conveyed to R. S. Blum-
merhasset of St Louis City, by the
Said parties of the first part for
his professional services to be
afterwards rendered, which now
has been done, ^{all of which will more} fully appear by reference to deeds ^{known} recorded and ^{known} filed and ^{known} appeared before the Said
Court and defended the Said
Crop upon the Indictment
aforesaid, and performed

all covenants and fulfilled all engagements which they had agreed to perform and fulfill in the defence of the Said Mel Son Croft upon the Indictment as aforesaid.

The said plaintiffs further state that the said Richard S. Blennerhassett deceased has left Therese M. Blennerhassett his widow, who is also his administratrix with the will annexed and duly qualified according to law to act as such, and the following children, heirs at law, Sarah Annie who is intermarried with George E. Martin, Edward W. Blennerhassett, Alice Josephine,

Therese Proadencia and Richard Byron Blennerhassett, who are the defendants in this cause, the three last of whom plaintiffs believe are minors, and ask that a guardian ad litem be appointed to answer this petition in their behalf.

Plaintiffs pray the Court to set aside the deed made by Nelson Croft and S. Croft, Eliza Croft, John B. Palmer, Elizabeth B. Palmer, John Parish, Minerva Parish, Jeremiah Etheridge, Agnes Etheridge, Elizabeth Croft, Margaret Croft, Elias Dobson and Louisa Dobson legal

owners as aforesaid to the Said
Richard S. Blenmerhasset for
failure of consideration, and
for non performance of contract
and agreement, And that the
title to the Said land be vested in
plaintiffs free from all incum-
brance by reason of Said deed,
and do all other things that in
the premises may seem just
and proper.

~~Richard S. Blenmerhasset~~
~~Edmond A. Richardson~~

Plaintiffs further ask the Court, in making it
do over to fix the value of the services
rendered by the said Blenmerhasset as
aforesaid, which amount so fixed by
the Court, they have here in Court and
tendering the same to the Defendant.

~~Edmond A. Richardson~~
for Plaintiff
and Nickerson

Edmond A. Richardson one of
the above named plaintiffs on
his oath Says, that the forego-
ing petition, and the matters
therein as stated, are true to the
best of his knowledge and be-
lieif.

Edmond A. Richardson.

Sworn to & subscribed
before me this 1st day
of June AD 1858.

In testimony whereof

Have hereunto set my hand and
seal of our Circuit Court at
Office in Union this 1st day
of June AD 1858.

J. H. Jeffries Clerk
By E. Butler & Co

Johnson & Co. Inc.
June 1838.

King and Co. Inc.

as of Section

Memorandum to them.

James Joseph

Chas

Wed June 4th 1838

Chas & Henry
Chas

Wash. Co. Inc.	120
1 copy per	125
2 copies per	250
3 copies per	100
4 copies per	180
5 copies per	10
6 copies per	12
7 copies per	12
8 copies per	12
9 copies per	12
10 copies per	12
11 copies per	12
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100 copies per	12

Robert A. King, and
Edmond A. Nickerson

against

Theresa M. Blennerhassett Admx of
the Estate of Richard S. Blennerhassett
de^d. Theresa M. Blennerhassett, George
M. Martin and Sarah Anne his wife
Edward W. Blennerhassett, and Alice
Josephine, Theresa Poadicia and
Richard Byron Blennerhassett
minor heirs of Richard S. Blenner-
hassett deceased.

In the Circuit Court of Jefferson
County Missouri Octr Term 1858

Plaintiff State, that sometime in the year 1857 a
certain Nelson Crop, was Indicted by the Grand
Jury for the body of the County of Jefferson Mo for the
wilful murder of one William G. McDonald, that
said Nelson Crop. then in the custody of the Sheriff
employed Richard S. Blennerhassett Esquire of
St Louis Mo, to attend to and defend his cause un-
till its final termination, and agreed as a com-
pensation for the aforesaid Services to make a good
and sufficient Deed to the following described
Real Estate, lying and being in the County of Jeffer-
son and State of Missouri, to wit: Beginning at
the S.W. Corner of N.W. q^r of Sec. No 20, in Town 39
Range 4 E. thence North, to the mouth of La' Marques
Spring branch to a white Oak marked X, thence
North Eastwardly, up and along a ravine, called

"Tree Hollow" to the East boundary line of the South West quarter of the South W. q. of Sec. 17. in T. 39 R. 4 E. thence S. to the S. E. corner of the N. W. of NW q. of said Section No 20. containing forty acres more or less. That in pursuance of such agreement, as aforesaid, the said Nelson Crp. together with A. G. Crp. Eliza Crp. John B. Palmer Elizabeth Palmer, John Parrish Minerva Parrish, Jeremiah Etheridge Agnes Etheridge, Elizabeth Crp. Margaret Crp. Elias Dobson and Louisa Dobson, all legal owners of said land, did actually make execute and deliver to the said Richard S. Blennerhassott, a good and sufficient deed to the real estate above described and conveyed all their right, title, and interest in said estate to said Blennerhassott, as a compensation for his Services to be rendered in said Case, Defendants. further State that when said case was called for trial at the November term 1857 of the Circuit Court of Jefferson County, the said Blennerhassott, appeared as counsel and took Change of Venue to the Circuit Court of Franklin County Mo. and a Special term thereof was held in January 1858. That sometime before the holding of said Court, and before the trial of the said Crp. the said Blennerhassott departed this life, and consequently could not perform the Services in defending the said Crp. that he agreed to perform in consideration of the real estate deeded to him as aforesaid. That at the said Special Term of the said Court the Plaintiffs were employed by the said Nelson

Crop. to defend him upon said Indictment and as compensation for their Services the said Crop and the legal owners aforesaid agreed to make plaintiff a good and sufficient deed to the said real estate, which said Crop and his cotenants, had conveyed to the said Blennerhassett as a compensation for his Services, which he promised to render in the case, and accordingly the said Nelson Crop, together with the said A. G. Crop, Eliza Crop, John B. Palmer, Elizabeth B. Palmer, John Parrish, Minerva Parrish, Jeremiah Etheridge, Elizabeth Crop, Margaret Crop, Elias Dobson and Louisa Dobson, all legal owners as aforesaid, did convey by deed to the said plaintiffs the above mentioned Real Estate, described as follows, to wit: The following described real Estate lying and being in the County of Jefferson, State of Missouri and numbered as follows, to wit: part of the S. W. $\frac{1}{4}$ of S. W. $\frac{1}{4}$ of Section, Seventeen (17) and part of N. W. $\frac{1}{4}$ of S. W. $\frac{1}{4}$ of Section Twenty (20) Township thirty nine (39) range four east, containing in all about forty acres and being the same piece of land heretofore conveyed to R. S. Blennerhassett of St. Louis City by the said parties of the first part, for his professional Services to be afterwards rendered, which never has been done all of which will more fully appear by reference to deeds marked A & B. herewith filed, and asked to be made a part of this petition. That said plaintiffs appeared before the said Court

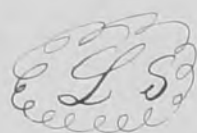
and defended the said Corp upon the Indictment aforesaid, and performed all covenants, and fulfilled all engagements which they had agreed to perform and fulfill, in the defence of the said Nelson Corp, upon the Indictment aforesaid. The said plaintiffs further state, that the said Richard S Blennerhassett deceased has left Theresa M Blennerhassett his widow who is also his administratrix with the will annexed and duly qualified according to law to act as such and the following children heirs at Law, Sarah Ann, who intermarried with George B Martin Edward W. Blennerhassett, Alice Josephine, Theresa Bodie, and Richard Byron Blennerhassett who are the defendants in this cause, the three last of whom plaintiffs believe are minors, and ask that a guardian ad litem be appointed to answer this petition in their behalf.

Plaintiffs pray the Court, to set aside the deed made by Nelson Corp. A. S. Corp. Eliza Corp. John B Palmer Elizabeth B Palmer, John Parritt, Monerva Parritt Jeremiah Etheridge, Agnes Etheridge, Elizabeth Corp Margaret Corp, Elias Dobson and Louisa Dobson legal owners as aforesaid to the said Richard S Blennerhassett for failure of consideration, and for non-performance of contract and agreement and that the title to the said land may be vested in plaintiffs, free from all incumbrances by reason of said deed, and do all other things that in the premises may seem just and proper

Robert A. King
Edmond, A. Nickerson

Edmond A. Nickerson one of the above named
plaintiffs on his oath says, that the foregoing
petition and the matters therein as stated are true
to the best of his knowledge and belief

Edmond A. Nickerson
Sworn to and Subscribed before me this 1st day
of June A D 1858. In Testimony whereof I
have hereunto set my hand and Seal
of our Circuit Court at office in Union
this 1st day of June A D 1858.



Wm Jeffries Clk.

By E Butler D.C.

Endorsed

"Filed June 4th 1858 Elias J Honey clk"

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

In Testimony whereof I hereto
set my hand and affix the
Seal of said Court at office in
Hillslas this 30th day of Septe
A D 1858

Elias J Honey Clerk

Robert A. King and
Edmon A. Nickerson

Against
Theresa M. Blennerhassott Adm^x
of the Estate of Richard S. Blennerhassott
dec^d. Theresa M. Blennerhassott
George G. Martin and Sarah Annie
his wife, Edward W. Blennerhassott
and Alice Josephine, Theresa Boa-
decia and Richard Byron Blen-
nerhassott minors of Richard
S. Blennerhassott deceased.

In the Circuit Court of Jefferson
County Missouri Octr Term 1858.

Plaintiffs State, that sometime in the year 1857 a
certain Nelson Crisp, was indicted by the Grand
Jury for the body of the County of Jefferson Mo
for the wilful murder of one William G. McDon-
ald. That said Nelson Crisp, then in the Cus-
tody of the Sheriff, employed Richard S. Blen-
nerhassott Esquire, of Saint Louis Mo. to attend
to and defend his cause until its final ter-
mination, and agreed as a compensation
for the aforesaid services to make a good and
sufficient deed to the following described
Real Estate, lying and being in the County
of Jefferson and State of Missouri, to wit: Be-
ginning at the S. W. Corner of S. W. q^r of Sec
No 20. in Town 39. Range 4 E. thence North

to the mouth of La. Marques. Spring branch to a white oak marked X thence North Eastwardly up and along a ravine called "Bee Hollow" to the East boundary line of the South West quarter of the S. W. qv of Sec. 17 in T. 39 R. 4 E. thence S. to the S. E. corner of the N. W. qv of N. W. qv of said Section No 20. Containing forty acres more or less. That in pursuance of such agreement as aforesaid the said Nelson Crop, together with A. G. Crop Eliza Crop John B. Palmer, Elizabeth Palmer John Parrish, Menerva Parrish, Jeremiah Etheridge Agnes Etheridge, Elizabeth Crop Margaret Crop, Elias Dobson and Louisa Dobson, all legal owners of said land, did actually make execute and deliver to the said Richard. S. Blennerhasset, a good and sufficient deed to the Real Estate above described and conveyed all their right title and interest in said estate to said Blennerhasset as a compensation for his services to be rendered in said case. defendants further state, that when the said case was called for trial at the November term 1857. of the Circuit Court of Jefferson County. the said Blennerhasset appeared as counsel. and took a change of Venue, to the Circuit Court of Franklin County Mo., and a Special term thereof was held in January 1858. That sometime before the holding of said Court, and before the trial

of the said Corp, the said Blennerhassott de-
parted this life, and consequently could
not perform the services in defending the said
Corp. that he agreed to perform in considera-
tion of the real estate deeded to him as afore-
said; That at the said Special Term of the
said Court, the Plaintiffs were employed by the
said Nelson Corp to defend him upon said
Indictment, and as compensation for their
services the said Corp, and the legal owners
aforesaid, agreed to make plaintiffs a good
and sufficient deed to the said Real Estate
which the said Corp and his Cotenants, had
conveyed to the said Blennerhassott as a
compensation for his services which he promis-
ed to render in the Court, and accordingly
the said Nelson Corp, together with the said
A. G. Corp, Eliza Corp, John B Palmer, Eliza-
beth B Palmer, John Parrish, Minerva Par-
rish, Jeremiah Ethendge, Agnes Etheridge
Elizabeth Corp, Margaret Corp, Elias Dobson
and Louisa Dobson all legal owners as afore-
said did convey by deed to the said plaintiffs
the above mentioned Real Estate, described
as follows to wit: "The following described real
Estate lying and being in the County of Jef-
ferson, State of Missouri and numbered
as follows, to wit: part of the SW $\frac{1}{4}$ of SW $\frac{1}{4}$
of Section Seventeen (17) and part of S.
W. $\frac{1}{4}$ of S W $\frac{1}{4}$ of Section Twenty (20)

township, thirty nine (39) range four East, containing in all, about, forty acres and being the same piece of land heretofore conveyed to R. S. Blennerhassett, of St. Louis City by the said parties of the first part, for his professional services to be afterwards rendered which never has been done, all of which will more fully appear by reference to deeds marked A. 113. herewith filed and asked to be made a part of this petition. That said plaintiffs appeared before the said Court and defended the said Crop upon the Indictment aforesaid and performed all covenants and fulfilled all engagements which they had agreed to perform and fulfill in the defence of the said Nelson Crop upon the Indictment aforesaid; The said plaintiffs further state that the said Rich and S. Blennerhassett deceased has left Theresa M. Blennerhassett his widow, who is also his administratrix with the will annexed and duly Qualified according to law to act as such, and the following children heirs at law, Sarah Annie who intermarried with George^{ts} Martin, Edward W. Blennerhassett, Alice Josephine, Theresa Brodecia and Richard Byron Blennerhassett who are the defendants in this cause, the three last of whom plaintiffs believe are minors and ask that a Guardian ad-litem be

appointed to answer this petition in their
behalf. Plaintiffs pray the Court to set aside
the deed made by Nelson Crop. A. G. Crop
Eliza Crop. John B. Palmer. Elizabeth B.
Palmer. John Parrish Minerva Parish,
Jeremiah Etheridge, ^{Agnes Etheridge} Elizabeth Crop. Marga-
ret Crop. Elias Dobson and Louisa Dob-
son legal owners as aforesaid to the said
Richard S. Blennerhassett, for failure of Con-
sideration and for non performance of Con-
tract and agreement. And that the title to the
said land be vested in plaintiffs free from
all incumbrances by reason of said deed
and do all other things that in the premises
may seem just and proper

Robert A. King

Edmond A. Nickerson

Edmond A. Nickerson one of the above named
plaintiffs on his oath says that the foregoing pe-
tition and the matters therein as stated, are
true to the best of his knowledge and belief.

Edmond A. Nickerson

Sworn to & Subscribed
before me this 1st day of
June A D 1858.

In testimony whereof I have
hereunto set my hand and ^{affixed} seal of
our Circuit Court at office in Union this 1st
day of June A D 1858.

Wm Jeffries Clk
By E. Butler S.C.

Endorsed

"Filed June 4th 1858

Elias D. Honey Clerk

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

In Testimony whereof, I hereto set
my hand and affix the Seal of
said Court at office in
Hellsboro. this 3th day of
June A.D. 1858

Elias D. Honey Clerk

COUNTY OF JEFFERSON, SS.

The State of Missouri.

St. Louis
To the Sheriff of the County of Jefferson--Greeting:

We command you, that you summon Theresa McBlennerhassett
Admrx of R. S. Blennerhassett dec'd. Theresa McBlennerhassett
George W. Martin and Sarah Ann his wife. Edward W. Blenner
hassett, Alice Josephine, Theresa Roadesia and Richard if they be
Byron Blennerhassett minor heirs of Richard S. Blennerhassett dec'd.
found in your County, that they 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 October
next, then and there to answer unto Robert A. King
and Edmond A. Richardson

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

Elias J. Hony
Witness, THO. G. FLETCHER, Clerk of our said Circuit
Court, with the seal thereof hereto affixed, at
office, in Hillsboro, this 3th day
day of June A. D. 1852

Elias J. Hony
CLERK CIRCUIT COURT.

Document Quality Target

Some of the following
scanned documents fall
below Imaging Standards.
These documents will be
scanned as received.

No. 4

2d Jefferson Circuit Court

October Term 1858

King and Pickens

vs. } Summons

Theresa M. Blennerhassett

George G. Martin and,

Sarah Anne his wife

Edward H. Blennerhassett

Alice J. Blennerhassett

Theresa B. Blennerhassett

Richard B. Blennerhassett

Executed this writ in the County of St. Louis
on the 31 day of Aug 1858 by delivering a
copy thereof and of the petition as furnished
by the Clerk to Edward M. Blennerhassett and
further by leaving a copy thereof at the usual
place of abode of Theresa M. Blennerhassett with
a white person over the age of fifteen years
and further by delivering a copy thereof
to Theresa B. Blennerhassett and Richard
B. Blennerhassett and George G. Martin and
further by reading the writ to Sarah
Anne Martin wife of George G. Martin.
Alice J. Blennerhassett not found
in my county. M. S. Lerme Shff
fees of Shff \$6³⁰ By J. A. Guion, Sept.

COUNTY OF JEFFERSON, SS.

The State of Missouri.

Buchanan

To the Sheriff of the County of ~~Jefferson~~—Greeting:

We command you, that you summon *Alice Josephine*
Blannerhasset

----- if she be
found in your County, that she do 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 October
next, then and there to answer unto *Robert A. King and*
Edmond A. Nickerson

upon ~~their~~ original petition, a copy whereof is herunto annexed and
accompanies this writ—and have you then there this writ.

Elias Honey

Witness, *THO. C. FLETCHER*, Clerk of our said Circuit
Court, with the seal thereof hereto affixed, at
office, in Hillsboro, this *30th*
day of *September* A. D. 1858

Elias Honey

CLERK CIRCUIT COURT.

I return the within writ not signed the within
named Alice Josephine Blumhagen not found in
Buchanan County State of Mississippi this 19 day
of October 1858

W. D. Morgan Sh. of
By vs vs Benjamin Depue
Buchanan County Miss

No. 11

vs Josephus Condit Court

October Term 1858

Robert H. King, and

Edmund S. Nickerson

vs J. Summons

Alice Josephine Blumhagen

COUNTY OF JEFFERSON, SS.

The State of Missouri.

Buchanan

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

We command you, that you summon Alice Josephine
Blennerhassett

----- if she be
found in your County, that she do 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 October
next, then and there to answer unto Robert A. King
and Edman A. Nickerson

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

Elias J. Honey

Witness, THO. G. FLETCHER, Clerk of our said Circuit
Court, with the seal thereof hereto affixed, at
office, in Hillsboro, this 30th
day of September A. D. 1858



Elias J. Honey

CLERK CIRCUIT COURT.

I return the within writ not served the within
named Alice Josephine Blumhardt per not served in
Buckham County, Mississippi on the 17 day of Oct
1858
At D Morgan Clerk of
By J. P. Blumhardt
of Buckham County, Miss

Robt A. King &

A. A. Nicholson

Alice J. Blumhardt

Copy Petition & writ for
defendant.

COPIED BY SEPTEMBER 22

Robert A. Ring and
Edmund A. Nickerson
Plaintiffs

vs

Theresa W. Blumerskapett
George J. Martin Sued &
George E. Martin, Sarah
Annie his wife, Edward
W. Blumerskapett, ~~and~~
Alice Josephine Blumerskapett,
Theresa Fredericka Blumerskapett,
Sued as Theresa Boadine
Blumerskapett and Richard
Byron Blumerskapett
Defendants

In the Circuit Court of
Jefferson County Oct. 5. 1858

And now come the defendants Theresa W.
Blumerskapett widow and Administratrix
of Richard J. Blumerskapett deceased, George
J. Martin, Sarah Anne Martin his wife,
Edward W. Blumerskapett and Alice
Josephine Blumerskapett and demurs to
the petition of the plaintiffs and for cause
of demurrer alledge,

psd. Because it appears
by the plaintiffs petition that before any conveyance
of the real estate in question had been
made to the plaintiffs by the said Nelson
Crop and the other ^{parties joining} ~~conveying~~ with him
in said conveyance the same real estate
had ~~been~~ already been conveyed to the said

Richard S. Blumenshafft deceased
by the same grantors by a ^{good & sufficient} deed thereto, and consequently at the time
of the making of the ^{deed} deed to the
plaintiffs, the ^{grants} ~~grantors~~ therein as grantors
have no right title claim or interest
in the land either in law or equity, ~~which~~ ^{and}
said deed conveyance, is ^{therefore} ~~inoperative~~ ^{and}
ineffective and in no way can ~~be~~ affect the
title rights or interests of the defendants, ~~in~~
~~land~~, as the heirs and distributees of
the estate of said R. S. Blumenshafft deceased,

2^d Because the petition shows that the
plaintiffs herein have never been parties
or privies to any contract between the said
Nelson Corp and the said Richard S.
Blumenshafft, and it is evident that said
plaintiffs have no right either in law or
equity to interfere, either to rescind or
enforce or in any other way to claim any
rights title or benefit, by or under the
same.

3^d Because the heirs of said Richard
S. Blumenshafft are in no way accountable
for, nor can they be affected as proposed
in the petition, by ~~any~~ ^{the} contract or agreement
stated to have been ^{made} between said Blumenshafft
and the said Corp.

4th Because no case is made nor are
there any facts stated in the petition
which will authorize or justify the court

in making the order or decree payable for,

5th Because the petition shows upon its face that the plaintiffs have no legal or equitable right, claim or interest in the real estate described in the petition, ~~and~~ ^{and} ~~that~~ ^{and} that the plaintiffs have no cause of action in any form against the defendants ^{either} or any of them.

C. C. Sumner
atty for defts.

And the said defendants Richard Byron Blumherschett and Theresa Fredericka Blumherschett by their guardian ad litem Wm C Fletcher who has been duly appointed by this court to defend this suit in their behalf come and answer to the plaintiffs petition and alledge the same causes for dismissal as ^{are} above set forth in the answer of the other defendants in this cause.

C. C. Sumner
atty for defts.

In the ~~Jefferson~~
County Circuit
Court - October
Term 1858

King and Buckner
vs

Theresa M. Hunter
Defect et al

Reverend
E. C. Simmons
for clerk

Dated Oct 25th 1858
Chas B Honeywell

Robert King and
Edmund Nicholson

Richard J. Blumenthal
and Theresa Blumenthal
infant heirs of Richard
J. Blumenthal deceased
impleaded with others

In the Circuit

Court of Jefferson
County October Term
1858

And now come the said defendants
Richard B. Blumenthal and Theresa
Blumenthal by their Guardian ad
litem Thomas C. Fletcher and say
that they have no personal knowledge
of the matters and things in the
plaintiffs petition contained and
they pray this Honorable Court to
protect their rights and interests
in all matters appertaining to the
premises.

Thos C Fletcher
Guard ad litem for minor Dfts

In the Jefferson
County Circuit Court

Henry and Henderson

vs

Whereas Mr. Clements for
sue's others

Answer of infant
heirs by Guardian

E. L. Simmons
attorney

Adm. Dec. 28 1859
John J. Keweenaw, Clerk

Robert A King and
Edmund Nicholson
vs Plaintiffs

Theresa M Blannerhassett
Administratrix of Richard
S Blannerhassett deceased
Theresa M Blannerhassett
George S Martini and Sarah
Annie his wife Edward W.
Blannerhassett Alice Josephine
Blannerhassett Theresa
Blannerhassett and Richard
Byron Blannerhassett

Defendants

In the Circuit Court
of Jefferson County

~~April Term 1889~~

October Term 1888

The defendants

Theresa M Blannerhassett George S Martini
Sarah Annie Martini Edward W Blannerhassett
and Alice Josephine Blannerhassett for answer to
the plaintiffs petition say that they believe it to
be true that one Nelson Crop was in the year 1887
was indicted by the Grand Jurors for the body of Jefferson
County for the murder of one William S McDonald
They also admit that said Crop employed the
said Richard S Blannerhassett of Saint Louis
County in the State of Missouri as his attorney to
defend him said Crop against said charge
but they have no knowledge or information suf-
ficient to form a belief whether or not said

Blannerhassett agreed to defend said prosecution
until its final completion and for his compensation
therefor ^{in full} to take a deed of the tract of land
described in said petition as the plaintiffs
have alleged, and require proof thereof.
These defendants admit that on the 27th day of
May 1857. said Adam Croft and other parties
mentioned in said petition as co-grantors
with him did by a full complete sufficient
deed containing full covenants of warranty
grant bargain and sell unto the said Richard
S. Blannerhassett the said tract of land
above mentioned for the specified sum and
consideration of four hundred dollars as
will appear by reference to a certified copy of
said deed herewith filed and these defendants
say that said deed ^{is} not only absolute on its
face acknowledging the receipt of said sum
of four hundred dollars the consideration
therein mentioned but at the time of its
execution was intended to be full complete
and absolute and to convey all the right
title claim and interest of the grantors
in and to said land absolutely without
any condition reservation limitation or
restriction whatever and did in fact vest
in the said R. S. Blannerhassett all the
estate of the said grantors in said land.

absolutely and without reserve expected,
intended or implied. These Defendants are
informed and believe and so charge that
said tract of land is not now, nor was it
at the time said deed was made worth more
than the sum of four hundred dollars, that
said sum was an inadequate compensa-
tion for the defense of said Cause by said
R. S. Blannerhassett: That said Blannerhassett
absolutely refused to enter upon or under-
take the defense of said Cause until the
sum of four hundred dollars was paid
or secured to him in advance as a retainer
fee: that said deed was made to him as
said advance payment and so intended
at the time that said Blannerhassett at-
tended the Jefferson County Circuit Court
at two different terms thereof in the defense
of said Cause: That he had extensive
practice and great experience in the defense
of Criminal Cases, and that the amount
expected in said deed if secured by him
was nothing more than a fair and ade-
quate consideration for the loss of time and
labor bestowed by him upon said Cause
and these Defendants deny any liability
or obligation in law or equity to account
to the plaintiff or any other person for any

portion of said sum. ^{merely} ~~merely~~ because said
Blannerhassett was prevented by death from
appearing on the final trial of said cause.
These defendants admit that said Blanner-
hassett died a few days before the trial of
said cause but have no knowledge except
such as ^{is} obtained from said petition that
the plaintiffs defended said Cross on said
trial or that said Cross agreed as a compen-
sation for said services to make them a
good and sufficient deed to the land
mentioned in said petition but these defen-
dants deny that said Cross, and the other
grantors, in said last mentioned deed
or either of them were the legal owners of
said land, or of any part parcel or portion
thereof or held any legal or equitable title
thereto, to convey and these defendants
charge that when said second deed
was made, said plaintiffs knew the fact
and as lawyers should have known
that said Cross and others making said deed
were not and could not be the legal owners of
property which is admitted in the petition
they had already conveyed to another by a
good and sufficient deed. These defendants
deny that there has been a failure of consi-
deration in said deed to said Blannerhassett

in whole or in part; they deny the right of this Court to set aside the deed to said Blannerhassett or to interfere with any of their rights as his heirs at law for any of the causes set forth in said petition; they deny that said Oref and his co tenants retained any legal or equitable lien on said land to secure the performance of the agreements charged to have been made with said Blannerhassett even if such agreement had been made or that any such claim if it were well founded could be conveyed by deed to the plaintiffs as is asserted and urged in said petition, they deny the right or power of this Court to divest them of their title to said land and vest the same in the plaintiffs; they deny that said plaintiffs have stated any case which entitles them to any order, judgment or decree of this Court in their favor, and these defendants pray to be dismissed with their costs in this behalf sustained

C. C. Simmons

Atty for Defts

State of Indiana,
County of Saint Joseph

C. C. Simmons, atty for defendants, being duly sworn states

that the matters and things as contained in the above answer he believes to be true

Given & subscribed to before me this
24th day of February 1857
My hand and seal

C. C. Simmons

Edw. A. Shand Notary Public

Lincoln County
Jefferson County

Robert C. King
and Edmund
Nichols

no

Shirley M. Plummer
Administratrix &c

Greener

E. P. Plummer
Administratrix

Filed July 28 1859
Elias J. Hovey

Attest

Robert W. King and
Edmund W. Nickerson
vs

Theresa M. Blenworth
Administratrix of Richard
S. Blenworth deceased
George Martin and Annie
his wife, Edward Blenworth
Theresa M. Blenworth,
Alice Josephine Blenworth
Theresa Bodicee Blenworth
Richard Byron Blenworth
Heirs of said Richard S.
Blenworth deceased,

On the Jefferson
County Circuit Court June Term 1859

Bill of Exceptions

Be it remembered

that on the 11th day of June on the final
hearing of this cause in the Jefferson
County Circuit Court the plaintiff offered
the following evidence, atty at Law

Daniel S. Goble being
duly sworn stated that Richard S. Blen-
worth deceased attended the Jefferson
County Circuit Court at the ^{term the} indictment
was found against Nelson Proffers murder
and acted as counsel for said Goble. He had
other business in court during that term.
A continuance was obtained for said Goble
at that term of the Court. Mr Blenworth
told the witness that Goble and his family
had deeded some the land in question to

pay him for his professional services in de-
fending Sisco & Elden Croft. Blumhaffett said
he had got his pay, that it was all the de-
fendants had and that he intended to de-
fend the case to the best of his ability. During
the vacation of the Court Blumhaffett served
me with notice that he should apply for
a change of venue in the cause at the
next term ~~of the~~ ^{of the} Court, at the November
Term of the Jefferson County Circuit Court which
I think was in November 1857. Mr Blumhaffett
attended said Court and obtained a change
of venue of the cause to the Franklin County
Circuit Court which met in the month of
January next succeeding. Before the sitting of
the Court in Franklin County Mr Blumhaffett died.
No one appeared to defend Sisco & Croft, & he &
his friends employed for that purpose the
plaintiffs in this case. On the trial of the
cause Croft was convicted of murder the
first degree, the plaintiffs appealed to the
Supreme Court and the judgment was re-
versed, and a new trial had in Franklin
Circuit Court and Sisco & Croft was convicted
of murder in the second degree & sentenced
to fifteen years imprisonment in the Penitentiary.
The plaintiffs defended him on
both trials and employed Mr Jones to argue
the case in the Supreme Court. Mr Blumhaffett
seemed to think the cause was valuable.

The witness stated that he was Circuit
attorney for that district, that Mr Blumhaffett
lived in St Louis, had known him by reputation
some many years, that he stood very high

as a lawyer in criminal cases could would
command large fees. I considered the case
of Croft as one of murder in the first degree
and that the convenience and change of
venue, both were proper and prudent for the
defense as the greatest hope seemed to be
obtaining delay. St. Louis is forty miles from
Hillsborough, in Jefferson County where the ~~first~~
~~indictment~~ ^{was} ~~was~~ formed. The plaintiffs have
done all that could be done for Croft and
I believe that he would have been hung
had it not been for Mr. Nickerson. I do
not think that under the circumstances
any other person could have done ^{more than} ~~as much~~
~~as~~ Mr. Nickerson. It is not unusual for attorneys
to take fees in advance for professional
services. In this case I understood that
the land was payment in advance for
the services undertaken by Mr. Blumenshaft.

The plaintiffs to my knowledge took their
deed of the land in question in payment for
the services rendered for Croft as above
stated.

The defendants objected to ^{all} ~~the~~ evidence
relating to the consideration of the deed
also to the services rendered by the plaintiffs after the filing of the
motion to set aside Blumenshaft's which objections
were
~~was~~ overruled and the defendants excepted.

John W. Hall, ^{attorney at Law} being sworn testified that Mr.
Blumenshaft told him that he had got
the land as his fee for defending Croft.
He ^{Blumenshaft} thought the land was ^{worth} 7 or 800 dollars. My
own information was that it was ^{not worth} ~~any more~~
more than 2 or 300 dollars and that it was

a very inadequate fee for defending the case. I can't say whether or not Mr Blumshof had any other case at the Jefferson County Circuit Court. He did not regard Mr Blumshof as a regular practitioner at that Court, but I have seen him there on other occasions.

The plaintiffs counsel then asked the witness what sum ought to be paid for the services of Mr Blumshof, in proportion to the value of the land, and compared with the services rendered by the plaintiffs. To this question the defendants objected, insisting that the proof should be confined to the actual value of the services and not for the purpose of obtaining a pro rata division of the sum fixed as the value of the land. The objection was overruled and the defendants excepted. The witness then stated that he could not say what he would have charged, one hundred or one hundred and fifty dollars would not be too much, thinks the plaintiffs ought to be paid more than Mr Blumshof. Mr Blumshof then came to assist in the defence offered me. His note for \$100 - if I would do so which I refused.

After dinner being duly sworn said that he ^{has} been Surveyor of Jefferson County and was now Sheriff of said County he knew the land in question, in his opinion it was not worth more than five dollars per acre. It might be worth more but it was all he would give for it. There are forty acres in the piece.

The plaintiffs then read in evidence the deeds to Paul Blumshof & to the plaintiff mentioned in the petition & closed their case. (Here insert said deeds)

The defendants then

introduced Abner Green as a witness who testified that he knew the parties Blumhaffett and Nelson Croft and his family, at the request of said Croft and his friends the witness wrote to Blumhaffett at St Louis, to come and defend the case. Blumhaffett replied by letter and came down before the indictment was found and remained several days at that term of the court. He was employed by Croft and spent a great deal of time in examining the witnesses and preparing the case. After the indictment was found he obtained a continuance. He had no other business at that term of the court except he appeared in a case in which he was employed after he came down. At the next term of the court he again attended the court & applied for and obtained a change of venue in the Croft case. He had no other business at that term of the court. The witness is an attorney at law. He considered the change of venue necessary to a hopeful defence of the case. He thinks Mr Blumhaffett was necessarily present four or five days each Term of the court. He was conversing with the witnesses a great deal. Mr Blumhaffett in the opinion of the witness a fair compensation should have received one hundred and fifty dollars for each trip, to Hillsborough.

James A Beal attorney at Law at Hillsboro for the defence testified that the fair value of the ground was in his opinion about three hundred dollars. Mr Blumhaffett was engaged in a case with the witness on his

first trip to Hellsboro. He had ^{no} other business
but the crop case on his next trip. Mr.
Blumhasset only practiced in Jefferson
County when employed in special cases

He could not state what Mr Blumhasset
ought to be paid for his services, but under
all the circumstances thought it would
be fair and just to divide the value
of the lease between the attorneys in the
cause, equally.

The above is all the evidence in
the case. When the plaintiffs closed their
case the defendants offered the following
instruction which the Court refused to give
and the defendants excepted (Here insert
the instruction)

The case was then submitted
to the Court and afterwards to wit on the 13th
day of June 1853 the following judgment
was rendered. (Here insert or refer to the
judgment in the cause)

And afterwards
on the same day the defendants made
a motion for a new trial in the following
words (Here insert the motion) which after-
wards and on the same day was overruled
by the Court & the defendants excepted

And afterwards and
on the same day the defendants made the
following motion in arrest of judgment (Here
insert the same) which also on the same
day was overruled by the Court & the defendants
excepted. and they now pray that this

their bill of exception may be signed &
sealed by the court and become a part of
the record in this case which is done

Wm. H. Stone Secy

King & Nicholson

in

Blennharwell Hall

Recd of Exchequer

24th June 14th 1859
Chas. W. W. W. W.

Robert A. King and
Edmond A. Nickerson

vs

Theresa M. Blennerhassett
Administrix of Richard
S. Blennerhassett deceased
Theresa M. Blennerhassett
George G. Martin and
Sarah Annie his wife
Edward W. Blennerhassett
Alice Josephine, Theresa
B. and Richard Byron
Blennerhassett heirs of Richard S.
Blennerhassett deceased

In the ~~State~~
Circuit Court Jefferson Circuit Court
Jan 9. 1859,

And now come the
said defendants and move
the court to set aside the judgment
order and decree in this cause and
~~and~~ grant a rehearing for the
following reasons

1st Because the Court
erred in admitting parol evidence
in reference to the consideration of
the deed from Nelson Croft and
others to said R. S. Blennerhassett

2^d Because the Court erred
in admitting parol proof ^{for} of the ^{purpose} pro-
~~ration value~~ of securing the proportional
value of the service, rendered by said
R. S. Blennerhassett to sum specified
in the alleged agreement ~~with~~ between

him and the parties in said case
3^d Because ^{the Court} erred in ~~stating~~
admitting other irrelevant and in-
competent evidence.

4th Because the sum awarded
as a compensation for the services
rendered by Serial Blomeshapett,
is totally inadequate, and under
the proof should have been much
larger.

5th Because the Court erred
in refusing the defendant's instructions.

6th Because the judgment is
against law, equity, and totally un-
warranted by the pleadings and proofs
in the case.

C. C. Scrimmer
Att'y for defts

King and

Michelson

vs

Blomeshapett,

heirs —

vs for men

trial

Filed June 1st 1859

Elias J. Hovey

Clerk

recorded

Robert A. King and
Edmund W. Nickerson
vs

Theresa M. Blenworth
Administratrix, of Richard
S. Blenworth deceased
and George S. Martin and
Ann his wife and
Edward, Alice, Richard
Byron, and Theresa B. and
Theresa M. Blenworth
Heirs of said R. S. Blenworth
deceased

In the Jefferson County
County Circuit Court June Term 1852

And now comes said defendant
and moves the court to arrest the
judgment in this cause) and set
aside the order and decree rendered
therein for the reason ~~that~~ the petitioner
does not shew or set up a state of facts
authorizing the plaintiffs to bring
this suit, or which entitles them to the
relief prayed for, ~~or that there is no~~
clear said petition alleges any facts
tending to shew that said plaintiffs
have not an adequate and complete
^{remedy} in law if they are entitled to sue at all,
and for the further reason that the said
~~judgment of the court~~ ^{petitioner} generally
certains no equity whatever, nor make

out any case authorizing the judgment
of the Court rendered herein

C. C. Summers
Ctly for depts

Hug & Mickerson
vs

Blumenthal & Co

Levis & Co

Now in court

Filed June 13th 1859

Elias J. Hooley
Clerk

remanded



Robert A. King &
Edmund A. Nickerson

by
Theresa M. Blumhasset
and others

In the Jefferson
Co. Circuit Court
June 9, 1859

Cyrillus C. Simmons, duly sworn
for the defendants in this cause
makes oath saying that the appeal
~~is~~ taken herein is not for vexation
or delay but because this affiant
believes that the appellants are
aggrieved by the judgment of
the Court

Subscribed & Sworn
to in open Court
June 13th 1859
Elias J. Honey, clerk

C. C. Simmons

Ernest Dickerson

25

Glennbrook
address only

address of D.

Recd June. 14th 1889
Ella Flourney

Oliver H. Hovey

We the undersigned Cyrenius C. Simmons
as principal and Peter E. Bland and James
A. Beal as securities acknowledge ourselves
indebted to Robert A. King and Edmund
W. Nickerson in the sum of fifty
dollars to be void upon this condition
whereas Theresa M. Blumhaffett, George
Martin and Annie his wife, Alice
Josephine Blumhaffett Edward Blum-
haffett, Theresa Bonedice Blumhaffett
and Richard Byron Blumhaffett have
appealed from the judgment of the Circuit
Court of Jefferson County in a certain cause
wherein said King and Nickerson
were plaintiffs and said Blumhaffetts
and the said Martin and wife were
defendants, now if said appellants will
prosecute their appeal with due
diligence to a decision in the Supreme
Court and shall perform such judgment
as shall be given by the Supreme Court
or such as the Supreme Court shall direct
the Circuit Court to give and if the
judgment of such Court or any part
thereof be affirmed, that they will com-
ply with and perform the same so far
as it may be affirmed and will pay
all damages and costs which may be
awarded against the appellants by the Su-
preme Court.

Signed and Sealed this 13th day
of June 1854,

C. C. Simmons Seal
P. E. Bland Seal
J. A. Beal (Security) Seal

Lucy Weston

Stenographer's

Chester Bees

Deposited the 14th June /59

John Stone

Allex June 14th 1859

Chas J Henry
Clerk

IN THE SUPREME COURT OF MISSOURI, HELD AT ST. LOUIS.

-----October-----Term, 1857.

Robert A. King & Co.	} Appeal from Jefferson Circuit Court.
Theresa M. Blumherkapett & Co.	

Now at this day come again the parties aforesaid, by their respective Attorneys, and the Court here being now sufficiently advised of and concerning the premises, do consider and adjudge that the judgment aforesaid, in form aforesaid, by the said Circuit Court rendered, be reversed, annulled, and for naught held and esteemed, and that the said appellants be restored to all things which they have lost by reason of the said judgment. It is further considered and adjudged by the Court that the said ~~cause be remanded to the said~~ for further proceedings to be had therein in conformity with the opinion of this Court herein delivered, and that the said ~~recover against the said~~ costs and charges herein expended, and have therefor execution. appellants recover against said respondents their costs and charges herein expended and have therefor execution.

STATE OF MISSOURI, } SCT.

I, WILLIAM S. GLANVILLE, Clerk of the Supreme Court of the State of Missouri, at St. Louis, certify that the foregoing is a full, true and complete transcript of the judgment of said Supreme Court, entered of record at the October Term thereof, 1857, in the above entitled cause.

Given under my hand and the Seal of said Court, at the City of Saint Louis, this seventeenth day of December 1857.

Wm S. Glanville,

Clerk.

Jefferson

Robert A. King vol.

③.

Messa M. Blemmerdaphett
vol.

Judgment Supreme Court,
Revised

Solution page 1 to 3.

Wrot " 4.

Return 4

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" hua 6

Judge on v 6

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Bond 20

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The Court is requested to decide that
the plaintiffs have failed in their
pleading, and pray to make out a
case which entitles them to the relief
prayed for, and the defendants
be for the defendants.

(a)

clefts instruction

King & Richman

Against

Blannerhassett heirs

And now again And the parties by their respective
Attorneys and proceed to the trial of this Cause and neither party
beginning as being the same is submitted to the Court. And after hearing
the allegations of the parties the evidence offered by each in
support thereof and the arguments of Counsel. The Court finds that
on the day 1855 Geo. Nelson Croft, being indicted for the
Crime of Murder in the Jefferson Circuit County, Engaged Geo. Richard
& Blannerhassett the Ancestor of the Defendants, an Attorney at law
to defend him in Court against the said Charge until the same
was finally ended, and as a Compensation for his said services
thereafter to be made as aforesaid. ~~Entered at deed~~ he in con-
junction with ^{others equally entitled} his ~~brother~~ executed to said Blannerhassett a deed
conveying to him the following described tract of land to wit (here
insert the description). That afterwards ^{before the termination of said Cause} on the day of
1858, ~~the said Blannerhassett~~ and before any considerable
services were rendered by said Blannerhassett ^{beginning} ~~in the above Cause~~
the said Blannerhassett departed this life intestate leaving the above
Defendants as his heirs at law. Whereby the Consideration of said
deed, and the principal inducement of the said Croft in making the
same had failed, and in consequence the said Croft became entitled
to have the said ~~contract~~ rescinded and his said land restored to

him, And it further appearing that the said Croft being Compelled
in consequence of the death of said Blennerhasset, to Engage the
services, ~~and~~ other attorneys to defend him against said Charge, And
that having Engaged the Plaintiffs as such Attorneys, for the purpose
of securing them a Compensation for such services by and of the
day of ~~the~~ 1835 ~~Conveyed to them~~ all the said several parties
executed to the Plaintiffs, ^{a deed} conveying to them all their right title and
Claims in and to said forty acres of land above described, whereby
the Plaintiffs have become substituted to all the rights of the said
several parties, as the same, It is therefore adjudged and decreed
that the said first mentioned deed to Richard B. Blennerhasset by
the several parties thereto, ~~be~~ and is hereby declared to be without
consideration, and ~~ordered~~ to be set aside, And that all the
title acquired by the defendants thereto, ~~be~~ divested out of them
and pass to and become vested in the Plaintiffs, ^{condition however of their paying} upon the ~~payment~~
to them of the sum of \$30, the amount in value of the services
rendered by the said Blennerhasset, ^{before his death} now ~~ascertained~~ by the County
court before the 1st day of the next Term of this Court, And it
is further ordered that the Plaintiffs pay the Costs herein.

Do this in Court

At Mr Buchanan's County Market 13/5 &
all the R & B living & other

See also

I sent to Mr. Thompson & I. Buchanan & Co. to send
a basket the 1 of the month for Mr. Lewis who can hear
with her mother. I am deeply
yours & the organ shop

Theresa Fredericka
Blennerhasset, and
Richard Byron Blennerhasset
are Minors -

As soon as a guardian
ad litem shall be
appointed by the Court
I request that he will
join with the other
defendants in the
demurrer to the petition

C. C. Sumner