

Jefferson County Circuit Court
Case Files: Civil
October 1858 #20

Box #

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Folder #

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Krousse, Mary

vs

Krousse, John

Divorce

Next friend William Bogan
on behalf of Pittf; Couple
Married in Germany June
1850; Vagrancy, desertion,
drunkenness; plaintiff nee
Kindeal

Mary Krouse, Plaintiff, } In the Circuit
Against } Court, Jefferson
John Krouse, Defendant } County, Missouri;

Plaintiff, by her next friend, William Bangor, states that, in June 1830, in Germany, she was lawfully married to the Defendant, and that she continued to live with him, as his wife, from that day until about the last of March 1855; except, that Defendant on several occasions, left Plaintiff, without any means of support, and remained absent for months and years, without being heard from, giving her no means of support during the time, - she having in the mean time to rely on her own industry, and the help of her Father for her maintenance. Plaintiff states that she has faithfully demeaned herself, and discharged her duties as the wife of Defendant, ever since the marriage, and has treated him at all times with kindness and affection. But, the defendant disregarding his duties as husband, has abandoned ^{her} at various times, remaining absent sometimes, as long as a year at a time, and furnishing her no means of support during the time; and in fact, Plaintiff charges that the said Defendant has been guilty of such conduct for the last three or four years, as to constitute him a vagrant within the meaning of the first section of an Act respecting vagrants. She further charges that the Defendant has been, since the marriage,

addicted to habitual drunkenness for the
space of two years & upwards. - Plaintiff
states that she has resided within this State
one whole year next before the filing of this
petition. Plaintiff further states that De-
fendant owns no real or personal property;
- but, that Charles Kincaid, plaintiff's father,
owes Defendant two hundred and fifty
dollars, secured by mortgage dated the 17th
of May 1856, for money belonging to plain-
tiff in her own right, and which was bor-
rowed by said Kincaid, to be paid in
annual instalments of \$50.00, each. -
Plaintiff states that there was born of said
marriage three children, now of tender age,
and that she has means to support herself
and children. - Plaintiff therefore for the
causes herein set forth, prays to be divorced
from the bonds of matrimony contracted ^{with} the
Defendant as aforesaid; that she may have the
care and custody of her said infant children,
and that the Court will adjudge her such
support & maintenance out of the Defendant's
property as may be just and right, and for
that purpose, that the said Charles Kincaid
may be ordered to pay said money to plaintiff
- and ^{that} the Defendant ^{may be} enjoined & restrained
from collecting the same, ^{that} and it may be
adjudged to belong to plaintiff for her
maintenance, - and to order that Defendant
pay to plaintiff such amount of money as
the Court may deem reasonable for her
support while this suit is pending, and
to make such further orders, from time

To time, touching the same, as may be just
and reasonable; and such other orders &
decrees touching the premises as may be
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 knowl-
edge 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 Defendant, for the mere purpose
of being separated from each other, but
in sincerity and truth, for the causes men-
tioned in the petition.

Morris Brown

Sworn to and subscribed
before me Sept. 3rd 1858

Elias J. Honey Clerk

In Circuit Court
of Jefferson County

Mary Turner

vs,
John Harman

Petition for divorce,
Not answering same
A. Greaves
for plaintiff

Dated Sept. 30 1858
Geo J. Honeywell

Mary Krousse Plaintiff } In the Circuit Court
Against } Jefferson County
John Krousse Defendant } Missouri

Plaintiff by her next friend William Burgar. States that in June 1850 in Germany she was lawfully married to the Defendant, and that she continued to live with him as his wife from that day until about the last of March 1858 except that defendant on several occasions left plaintiff without any means of Support and remained absent for months and years without being heard from giving her no means of Support during the time, she having in the mean time to rely on her own industry and the help of her Father for her maintenance. Plaintiff states that she has faithfully demeaned herself and discharged her duties as the wife of Defendant, ever since the marriage and has treated him at all times with kindness and affection: But the defendant, disregarding his duties as husband has abandoned her at various times remaining absent sometimes as long as a year at a time and furnishing her no means of Support during the time: and in fact plaintiff charges that the said defendant, has been guilty of such Conduct for the last three or four years as to constitute him a vagrant within the meaning of the first section of an act respecting Vagrants. She further char

-ges that the Defendant, has been since the marriage, addicted to habitual drunkenness for the space of two years & upwards. Plaintiff states that she has resided within the State, one whole year next before the filing of this petition. Plaintiff further states that Defendant owns no real or personal property; But that Charles Kindeal, plaintiffs father, owes defendant two hundred and fifty dollars secured by mortgage dated 17th May 1856 for money belonging to plaintiff in her own right and which was borrowed by said Kindeal to be paid in annual instalments of \$50.00, each. Plaintiff states that there was born of said marriage three children now of tender age, and that she has means to support herself and children. Plaintiff therefore for the Causes herein set forth prays to be divorced from the bonds of matrimony contracted with the defendant aforesaid, that she may have the care and custody of her said infant children; and that the Court, will adjudge her such support & maintenance out of the defendants property as may be just and right and for that purpose that the said Charles Kindeal may be ordered to pay said money to plaintiff, and that the Defendant may be enjoined & restrained from collecting the same, and that it may be adjudged to belong to plaintiff, for her maintenance

and ^{to} order that defendant, pay to plaintiff
such amount of money as the Court may
deem reasonable, for her support, while this
Suit is pending, and to make such further
orders from time to time touching the same
as may be just and reasonable; and
such other orders & decrees touching the
premises as may be 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 be-
lief of the plaintiff, and that the Complaint
is not made out of levity or by collusion,
fear or restraint between the plaintiff and
defendant for the mere purpose of being
separated from each other but in sincerity
and truth, for the causes mentioned in the
petition.

McKim Brown,
Sworn to and Subscribed
before me Sept 30 1858
Elias J. Honey Clerk }

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 Hillsboro. Sept. 4th 1858
Elias S. Hooney Clerk

COUNTY OF JEFFERSON, SS.

The State of Missouri.

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

We command you, that you summon *John Krousse*

----- if he be
found in your County, that he 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 *Mary Krousse*

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



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

Elias D. Honey

CLERK CIRCUIT COURT.

Mary Howells

John Howells

Copy Retained for defense.

A true copy of the will-
attest. } E. J. Howney clerk

COUNTY OF JEFFERSON, SS.

The State of Missouri.

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

We command you, that you summon *John Krousse*

----- if he be
found in your County, that he, 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 *Mary Krousse*

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

Elias I. Honey

Witness, ~~Wm. D. Fletcher~~, Clerk of our said Circuit
Court, with the seal thereof hereto affixed, at
office, in Hillsboro, this *Fourth*
day of *September* A.D. 1858

Elias I. Honey

CLERK CIRCUIT COURT.

Executed the within summons in the County
of Jefferson State of Missouri

John Krouse not found within my County
non Est Oscar Dred Sheriff

No 20. 1547

to Council Court

October Term 1858

Henry Brown

vs & summons

John Brown

Sherriff fee 50 cents

Winfield Ch

Mary Krouse, plaintiff } In the cir-
Against } Circuit Court
John Krouse, defendant, } Jefferson County

I, William Bungan, hereby consent
to act as next friend for Mary Krouse
the plaintiff, a married woman, who
is about to commence a suit in the
Circuit Court of Jefferson County, against
John Krouse, for a divorce and to be
responsible for the costs.
Attest William Bungan
Chas D Honey

I, hereby appoint William Bungan
next friend for said Mary Krouse.

In testimony whereof I here to set
my hand and affix the Seal of
said Court, Sept 3 1858
Chas D Honey clerk

To the Clerk of the ^{Circuit} Court of Jef-
ferson County, The Petition of Mary Krouse
a married woman, states that she desires
to bring a suit against John Krouse
her husband for a divorce, and de-
sires William Bungan, appointed as
her next friend

Sept. 3, 1858

Mary Krouse

Mary Hrouse

15

John Hrouse

Filed Sept 30 1858
Chas J Hovey
Clerk

1 copy Pat. 1.25	4 30
Office	50
Had to up	1.20
off. & travel	35
over —	50
	4.80