

Jefferson County Circuit Court
Case Files - Civil
June 1862

Box 13 Folder 61

Rolf, Anna

v.

Rolf, Fred W.

Divorce

married November 29, 1853; Abuse and
Drunkenness; enjoined Defendant from
disposing of property.

Anna Wolf, Plaintiff,
Against
Fred. W. Wolf, defendant

In the Circuit Court of
Jefferson County Missouri,

The Plaintiff states that on the 22nd day of
November A.D. 1883, she was lawfully married
to the defendant; that plaintiff continued to
live with defendant, as his wife, from & after
the day and year aforesaid, until about the
30th day of March last past; that during
all that time plaintiff faithfully demeaned
herself, and discharged all her duties as the
wife of defendant, and at all times treated him
with kindness and affection; but said defen-
dant, ~~wholly~~ wholly disregarding his duties as the
husband of the said plaintiff, has been addicted
to habitual drunkenness for the space of two
years next before bringing this suit, and that
he has been guilty of such cruel and bar-
barous treatment of the plaintiff as to endanger
her life & that he has offered such indigni-
ties to the said plaintiff as to render her
condition intolerable, that the said defen-
dant beat her with a club, & threatens her
life.

Plaintiff further that she has ^{resided} within
this state one whole year next before
the filing this petition. The plaintiff
prays to be divorced from the bonds of
matrimony, contracted as aforesaid with
the defendant.

J. C. Henderson atty for plff

this Affiant, the plaintiff, makes oath & says
that the facts stated in the above petition
are true, according to the best of ~~his~~ knowledge
and belief, of the said plaintiff, & that the
Complaint is not made out of treachery
or 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 this petition

Amice Boff

Sworn to & subscribed }
before me this 8th or
day of April 1862
Elias J. Hooney clerk

Charles & Hall

and W. Hall.

Petition for divorce

Filed April 8th 1862

Wm. J. Hooney Clerk

Anna Ralf, plff, Application for an
injunction in the
Fres. W. Ralf, deft. } County Court of Jefferson
County.

April Term, 1862

The defendant, Fres. W. Ralf, is hereby
notified that application will be made
to the Court on the 11 day of April 1862,
or as soon after, thereafter as ~~cases~~
Counsel can be heard, to grant an injunction
to restrain the said Fres. W. Ralf ^{& all others} from selling
the personal property now in his possession,
April the 10th 1862.

Anna Ralf.
by Saml. Henderson
attorney,

I served the Within Notice on William
Sealf by reading the same in his
hearing and presence on the last
midnight of April 18. 62

May the 10. or 11

E. F. Wilson
Constable

Anna Sealf
vs
Geo. W. Sealf

Notice to be
served on
Geo. W. Sealf

by the Constable

Anna Rolf, plaintiff.)

against

Jos. Rolf, defendant

In the County Court of
Jefferson County, Mo.

The plaintiff states, that she was lawfully married
to the defendant on the 18th day of
18. That at the time of the marriage, she
was seized of a considerable amount of property, that
that the defendant was at the time of said marriage,
without property, or effects of any kind, of which property
still remaining undisposed, to wit, ~~two~~ one sorrel
mare, one sorrel horse, three ~~black~~ cows, & calves,
thirteen head of hogs, about four dozen chickens,
& six head of geese, ~~one & two horse wagon~~
~~one set of~~ ~~two bedsteads~~, four feather
beds and two bedsteads, two sheets, one cooking
stove, six plates, six knives & forks, one table
cloth, three chairs, two trunks, six sedes, of
~~beds~~ five hams & five shoulders of Bacon,
about five Bushels of Wheat, ~~or~~ about six
Bushels of Corn, & about eight Bushels of potatoes
of potatoes, five or six Books, about twenty four
pounds of lard, ~~and~~ ~~these~~ and two plows, &
divers other little articles.

The plaintiff alleges that she has since instituted
suit in the circuit court for habitual drunkenness
& divers other causes, that the said suit is
still pending, that defendant ~~to convert the~~ ~~is~~
~~about to squander~~ ~~and~~ ~~property~~ ~~of~~ ~~same~~ ~~property~~ is proceeding fraud-
ulently to convert the same to his own use, for the
purpose of placing the same ^{beyond} her reach, and depriv-
ing her of the benefit.

That M. J. stood unless restrained will dispose
of said property within a few days, Plaintiff prays
that the ~~defend~~ Court to enjoin said defendant to
from disposing of said property, to grant such other
and further relief to to them may seem just,

Sam. C. Hudrickson
Atty for Plaintiff,

Plaintiff makes oath & says that the facts
stated in the foregoing ^{petition} ~~are~~ ^{are} true
^{states} sworn to & subscribed
before me this 10th day
of April 1862 } Anna Haggrafe Ross

J. A. Rappaport Clerk

Anna M. Ross

J. M. Ross

Petition for Injunction

Filed April 11th 1862

Edw. J. Horrey Clerk

Anna Ralf Plaintiff }
vs } In the County Court of Jefferson
Fred W Ralf Defendant } Application for Injunction
April 11 1862

Now at this day comes the plaintiff and makes proof of notice to the defendant of this application and presents her application for an injunction. The court proceeds to examine the Complaint and petition of the plaintiff, and it appearing to the satisfaction of the court that the defendant is about to squander and waste the property of the plaintiff which she owned at the time of her marriage and fraudulently convert the same to his own use for the purpose of placing the same beyond her reach & thereby deprive her of the benefit thereof, It is therefore considered, ordered adjudged and decreed that the defendant be enjoined and restrained from disposing of or otherwise interfering with such property ^{during the pendency} until the determination of her suit in the Jefferson Circuit Court against said defendant for a divorce to wit, one Aroel mare, one Aroel horse three cows & calves, thirteen head of hogs, four dozen chickens, six geese, four feather beds, two bedsteads, two sheets, one cooking stove six plates, six knives and forks, one table cloth three chairs, two trunks, six sides, five hams five shoulders of bacon, five bushels of wheat sixty bushels of corn, eight bushels potatoes five books, 24 pounds of lard, two plows and all other personal effects of said plaintiff And it is further ordered that

the Clerk of this Court certify the proceedings
in this Cause to the clerk of the Circuit
Court of Jefferson County
Given under our signatures this 11th
day of April 1862

G. I. Johnston
John H. Thompson
County Court Justices

The State of Missouri, } ss.
COUNTY OF JEFFERSON.

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

We command you, that you summon *Fred M Rolf*

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 second Monday after the fourth
Monday of *May* next, then and there to answer unto
Anna Rolf

upon *her* original petition, a copy whereof is hereunto annexed and ac-
companies this writ, and have you then there this writ.

Witness, ELIAS F. HONEY, Clerk of our said Circuit
Court, with the seal thereof hereunto affixed, at office
in Hillsboro, this *Eleventh*
day of *April* A. D. 1862

Elias F Honey

Clerk Circuit Court.

I hereby appoint Ephraim F Wilson my Special
Deputy to serve this writ for me. this 11th day of April
1862 Oscar Dover Sheriff

I executed the within writ in the County of Jefferson
State of Missouri on Frederick W Rolfe by delivering
him a certified copy of this writ and petition as
furnished me by the Clerk also reading said
writ to him on the 11 day of April 1862.

Oscar Dover Sheriff
by E. F. Wilson
my Special Deputy to serve
this writ

TO JEFFERSON CIRCUIT COURT

1649
June Term, 1862

Anna Rolfe

v.

Fred W. Rolfe

Sheriff fee \$1.00
to serving me 50
for inspection 150

Chs