

Jefferson County Circuit Court
Case Files - Civil

Box No. 15 File No. 17

December 1863-No. 43.

Morse, Juliana by next friend
Morse, David W.

vs

St. Louis Iron Mountain Rail Road Company
Burgan, Daniel

Trespass

Defendant cut and removed
timber; damages \$375;
Depositions

Juliana Morse By her next friend
David W Morse Plaintiffs

against
The St Louis & Iron Mountain
Rail Road Company &
Daniel Burgham Defendants

In the Circuit Court
of Jefferson County
Missouri

The plaintiffs states that
defendants about the month of April 1863,
wrongfully and without leave took and converted
to their own use at the tunnel station on
the St Louis and Iron Mountain Rail Road in
Jefferson County Mo, one hundred and fifty
cords of wood of the value of two dollars and
fifty cents per cord, the property of Juliana
Morse and which had been cut & taken
previously from the land and real estate
belonging to said Juliana Morse near said
Tunnel station in said County.

Plaintiffs ~~asked~~ sustained damages to the
amount of three hundred and seventy five dollars,
by reason of said wrongful taking & converting
of said wood by defendants & for which sum plain-
tiffs ask judgment.

J A Beal
C A Newcomb & Atty for Plaintiffs



D W Morse states on oath that the foregoing
petition & the matters therein ~~are~~ stated he believes
to be true
Subscribed & sworn to
before Nov 11th 1863
Attest by Clerk for, on
per Wm Mullin Spty.

David W Morse

Judiana Murrelet

As

Stenis & Murrelet

Seafar & Seafar

Filed Nov 10 1863

W. A. M. W. A. M.

W. A. M. W. A. M.

\$1 paid by self

3 copies per
2 mits 2 copies

Juliana Morse ^{by her next friend} David St. In the Circuit
 Morse Plaintiffs } Court of Jeff-
 Against } erson County
 the St Louis & Iron Mountain } Missouri
 Rail Road Company &
 Daniel Burgan Defendants }

The plaintiffs state that defendants about the
 month of April 1863 wrongfully & without leave took
 & converted to their own use at Tunnel Station
 on the St Louis & Iron Mountain Rail Road in Jeff-
 erson County two one hundred & fifty cords of
 wood of the value of two dollars & fifty cents
 per cord the property of Juliana Morse &
 which had been cut & taken previously from
 the land & real estate belonging to said Jul-
 iana Morse near said Tunnel Station in said
 County. Plaintiffs have sustained damage
 to the amount of three hundred & seventy-
 five dollars by reason of said wrongful
 taking & converting of said wood by defend-
 ants for which said plaintiffs ask judgment.

I A Deal atty for plaintiffs
 R W Morse states on oath that the foregoing petition &
 the matters therein as stated he believes to be true
 Subscribed & sworn to before David W Morse
 me Nov 10 " 1863

S D Reppy Clerk to let
 per R W W Mullin dpy

True copy of the original petition
and affidavit on file in my office
Witness my hand and
seal of said Court Nov 11th.

1863,

Elias J. Honley clk

Juliana Morse by her next	} In the Circuit Court of Jefferson County Missouri
friend David W Morse Plaintiffs	
Against	
The St Louis & Iron Mountain Rail Road Company & Daniel B Borgan Defendants	

The plaintiffs state that the defendants about the month of April 1863 wrongfully & without leave took & converted to their own use at the Tunnel Station on the St Louis & Iron Mountain Rail Road in Jefferson County Mo One hundred and fifty Cords of wood of the value of two dollars and fifty cents per cord the property of Juliana Morse and which had been cut and taken previously from the land & Real Estate belonging to said Juliana Morse near said Tunnel Station in said County

Plaintiffs have sustained damage to the amount of three hundred and seventy five dollars by reason of said wrongful taking & converting of said wood by Defendants for which sum Plaintiffs ask Judgment.

I A Deal &

C A Newcomb Atty for plaintiffs

David W Morse states on oath that the foregoing petition & the matters therein as stated he believes to be true —

Subscribed & sworn to
before Nov 11th 1863
S A Peppy Clerk Co Det } David W Morse
per R W McMullin Deputy }

A true copy of the original Petition on file in said cause

W. Chas D Honey
Clerk

Juliana Morse by
next friend
David W Morse

vs
St Louis & Iron
M R R Company
& Daniel Burghard

Copy of Pet

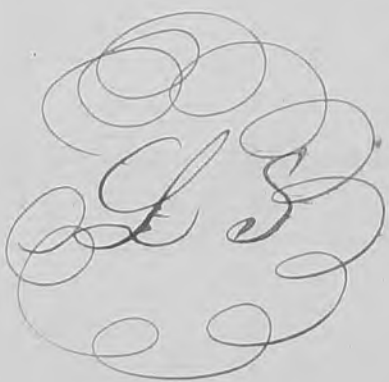
The State of Missouri, } ss.
COUNTY OF JEFFERSON.

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

We command you, that you summon *The St Louis and
Iron Mountains Rail Road Com-
pany & Daniel Burgar*

*if they be 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 second Monday after the fourth
Monday of November next, then and there to answer unto
Juliana Moore and David W.
Moore*

upon *their* 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 *Tenth*
day of *November* A. D. 1863

Elias F. Honey
Clerk Circuit Court.

James

TO JEFFERSON CIRCUIT COURT

Memorandum Term, 1863

John A. Albane &
W. Moore

Attorneys for the
Respondent

Copy of the
in the case

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

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

We command you, that you summon *The St Louis and
Iron Mountain Railroad Company
and Daniel Burgess*

if they be 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 second Monday after the fourth
Monday of November next, then and there to answer unto
J. Leard Morse & David W. Morse

upon *his* original petition, a copy whereof is herewith annexed and
companies this writ, and have you then there this writ.

Witness, ELIAS F. HONEY, Clerk of our said Circuit
Court, with the seal thereof herewith affixed, at office
in Hillsboro, this *Tenth*
day of November A. D. 1863

Elias F. Honey

Clerk Circuit Court.



No 43

TO JEFFERSON CIRCUIT COURT

December Term, 1863

Jessie Lee &
David W. Lease
vs
E. H. Hannon
The Shiloh and
Iron Mountain Rail Road
Coast Surveyors

Amount due to
the Shiloh and
Iron Mountain Rail Road
Coast Surveyors \$200

I hereby do
it to the court
I have the
sum of
\$13.00
and
the same

State of Missouri in the
County of Iron Mountain road & company
the 21st day of December 1863 by
Deliver, Ed. Ridge by agent of said
company at Desoto Station in said
Jefferson County a True
Copy of the Within Writ and
a next partition as furnished
to me by the clerk
the Within named Daniel Burge
not found in my county until
the 7th day of December 1863
upon which day I delivered it on him
by Deliver him a True Copy
of the Within Writ of B. D. Dyer Sheriff
by J. B. Dyer Rep. 2

Juliana Morse by her next
 friend David W. Morse Plaintiffs
 against
 The St Louis & Iron Mountain
 Rail Road Company &
 Daniel Burgar Defendants

In the Circuit
 Court of
 Jefferson County
 Missouri

The Defendant Daniel Burgar
 appearing from his co-plaintiffs for his separate
 answer to plaintiffs petition denies that he did
 on or about month of April 1863 or at any
 other time wrongfully & without leave took &
 converted to his own use at the Summit Station
 on the St Louis & Iron Mountain Rail Road
 in Jefferson County two one hundred & fifty
 cords of wood of value of two dollars & fifty
 cents per cord. or any other number of
 cords the property of Juliana Morse

Defendant states that he has no sufficient
 knowledge or information upon which to
 form a belief as to whether any cord wood
 has been cut & taken from the land & now
 estate belonging to the said Juliana Morse
 near said Summit Station

Defendant states that he has no sufficient
 knowledge or information upon which to
 form a belief as to whether said Juliana
 owned any lands in the vicinity of the
 said Summit Station

Defendant denies that the plaintiffs
 has sustained ^{damage} the amount of three
 hundred & seventy five dollars by reason of
 said wrongful taking & converting of said

wood by defendant as alleged in plaintiffs
petition or in any other return

Defendant denies that he wrongfully took
or converted to his own use any cord wood
or other wood the property of the plaintiffs

Defendant therefore prays to be discharged
permitted to go home without day

Perryman Hartw

Atty for Defendant Burzon

Daniel Burzon being duly sworn
makes oath and says the foregoing
answers and matters therein stated
to be true to be true

Sworn to and Subscribed

before me Decr 17 1863

Elias J Honey Clerk



Juliana Moore by
our friend
A. M. Moore

as
shown from the
Railroad Co &
the Burgans
~~~~~  
and of a Burgans  
~~~~~

Made Decr 11th 1863
Edwin & Henry Clark

Fuliana Morse by her next friend

David W. Morse - Plaintiff

Against

The St Louis & Iron Mountain Rail Road
Company & Daniel Borgman Defendants

In the Circuit Court of
Jefferson County Missouri
December Term 1863

The St Louis and Iron Mountain rail road Company one of the defendants in the above entitled cause for answer to the plaintiffs petition state that they have no knowledge or information sufficient to form a belief as to whether David W. Morse is the next friend of Fuliana Morse as alleged in the Plaintiffs petition and therefore ask proof thereof. These Defendants deny that "about the month of April 1863 they wrongfully and without leave took and converted to their own use "At Sumner Station on the St Louis and Iron Mountain Rail Road "in Jefferson County Mo", over hundred and fifty cords of wood of the "value of two dollars and fifty cents per cord, the property of Fuliana Morse, and which had been cut and taken previously from the land "and real estate belonging to said Fuliana Morse near said Sumner Station in said County, or that Plaintiffs have sustained damage to the amount of three hundred and seventy five dollars" or any other sum by reason of the wrongful taking and converting of any wood by these Defendants belonging to the Plaintiffs, and ask to be discharged with their costs.

Tausig & Kellogg Attorneys for St Louis
& Iron Mountain Rail Road Company

State of Missouri

County of St Louis } ss. -

Josiah D. Bush
agent of

defendant, being duly sworn, on his oath says that the foregoing answer and the matters and things as therein stated he believes to be true.

Subscribed & sworn to before me }

this 11th day of December 1863 }

Witness my hand & seal

Moder J. Child

Notary Public,

St. Louis, Co. Mo

Sidor Rush

2340

Subsided Morse by Mrs. Wright
David. W. Morse. Practically

Against

The St. Louis & Iron Mountain Road
and Daniel Webster. Dependent

Member of Iron Mountain R.R.

Jefferson Co. Circuit Court
Dec. Term 1863

Filed Dec. 12, 1863
Dean J. M. M.
Clerk

COUNTY OF JEFFERSON.

THE STATE OF MISSOURI,

To *Wm. S. W. Wilson, David Bowen*
David Bowen

GREETING:

You are hereby Commanded, That setting aside all

manner of excuse and delay, you appear before our Circuit Court for the County aforesaid, on the
~~second Monday~~ *the 17th day of June A.D. 1864* at Hillsboro, then and there
to testify, and the truth to say in a certain matter of controversy, now pending in our said
Court, wherein *William Wilson by J. W. Wilson next friend is*
Plaintiff and *St. Louis & Iron Mountain Road Road Company is* Defendant on the
part of *St. Louis & Iron Mountain Road Road Company* and herein you are in no wise to fail.

WITNESS, ELIAS F. HONEY, Clerk of our said Court,

with the Seal thereof hereto affixed, at office, this

17th day of *June* A. D. 1864

Elias F. Honey
Clerk.

TO JEFFERSON CIRCUIT COURT.

Four

Jan, 1864

~~Isaac~~ ~~Morse~~

St Louis & S. W. Rail Road Dep

for Dep

N. Deamp

J. W. Wilson

Samuel Dilton

J. W. Arisman

W. Blank

Daniel Burgeon

B. D. Over & H. H. \$300

John H. Morse Plaintiff
against
The St Louis & Iron Mountain R R Co

for Dep

I expected this writ on J. W. Wilson
Samuel Dilton J. W. Arisman or the H.

THE STATE OF MISSOURI,

COUNTY OF JEFFERSON.

To Henry Wirtz, Matt Johnson, & Co. Secs

GREETING:

You are hereby Commanded, That setting aside all manner of excuse and delay, you appear before our Circuit Court for the County aforesaid, on the 17th day of June 1864 at Hillsboro, then and there to testify, and the truth to say in a certain matter of controversy, now pending in our said Court, wherein

is Plaintiff and the said above John Johnson

Defendant on the part of Plaintiff and herein you are in no wise to fail.

WITNESS, ELIAS F. HONEY, Clerk of our said Court,

with the Seal thereof hereto affixed, at office, this 23rd day of May A. D. 1864

Elias F. Honey
Clerk.

SUBPOENA

TO JEFFERSON CIRCUIT COURT.

June Term, 1864

Juliana Morse

*vs
St Louis & San Moient
Railroad Co*

for Pelf

*Henry Viirett
Matt Johnson
Dr. Evans*

J B Dorer \$1.50

*I executed this writ on Dr. Evans on the 26th day of May 1864
on Henry Viirett Matt Johnson on the 4th day of June 1864
By Harding & Co to them*

Jerome B Dorer & Son

THE STATE OF MISSOURI,

COUNTY OF JEFFERSON.

To *Samuel Burges*

GREETING :

You are Hereby Commanded, That setting aside all manner of excuse and delay, you appear before our Circuit Court for the County aforesaid, on the *17th day of June 1864* at Hillsboro, then and there to testify, and the truth to say in a certain matter of controversy, now pending in our said Court, wherein *Juleanna Albene* by next friend

"
Plaintiff and *the Horses of said Albene* said
vs

Defendant on the part of *defendant* and herein you are in no wise to fail.

WITNESS, ELIAS F. HONEY, Clerk of our said Court,

with the Seal thereof hereto affixed, at office, this

23d day of *May* A. D. 186*4*

Elias F. Honey

Clerk.

SUBPOENA

TO JEFFERSON CIRCUIT COURT.

June Term, 1864

Juliana Moore

vs
St Louis Iron & Co. R.R.

for debt
David Burgeon

J. B. Doremus A. 25

David Burgeon not informed in my capacity this June 6th 1864

J. B. Doremus



THE STATE OF MISSOURI,

COUNTY OF JEFFERSON.

To *George Wall Joseph & associates*

GREETING :

You are Hereby Commanded, That setting aside all manner of excuse and delay, you appear before our Circuit Court for the County aforesaid, on the *17th day of June 1864* at Hillsboro, then and there to testify, and the truth to say in a certain matter of controversy, now pending in, our said Court, wherein *Sullivan & Co. vs. J. J. French*

Plaintiff and *Samuel Lewis & Son* Defendant *Beil*
read to in

Defendant on the part of *Plaintiffs* and herein you are in no wise to fail.

WITNESS, ELIAS F. HONEY, Clerk of our said Court,

with the Seal thereof hereto affixed, at office, this

23rd day of *May* A. D. 186*4*

Elias F. Honey
Clerk.

SUBPOENA
TO JEFFERSON CIRCUIT COURT.

June Term, 1864

Juliana Morse

vs

*St Louis Iron Mountain
Railroad Co.*

for Pelf

*George Hall
Joseph Arismar*

J B Dorer Sheriff \$1.00

*of executed this writ on George Hall & Joseph
Arismar by Reading. The same in his presence
and hearing of Mr. Dorer Aug 1 1864*

J B Dorer Sheriff

RECEIVED
JUL 1 1864

THE STATE OF MISSOURI,

COUNTY OF JEFFERSON.

To *A. De Looze & W. McLean Land Attors*
J. W. Cowman

GREETING:

You are hereby Comanded, That setting aside all manner of excuse and delay, you appear before our Circuit Court for the County aforesaid, on the *21st day of November next* at Hillsboro, then and there to testify, and the truth to say in a certain matter of controversy, now pending in our said Court, wherein *Jules and Mabel by next friend is*

Plaintiff and *the Union and Iron Mountain Rail Road Co*

Defendant on the part of *defendant* and herein you are in no wise to fail.

WITNESS, ELLAS F. HONEY, Clerk of our said Court,

with the Seal thereof hereto affixed, at office, this

15th day of *Octo* A. D. 186 *4*

Ellas F. Honey
Clerk.

SUBPOENA

TO JEFFERSON CIRCUIT COURT.

November Term, 1864

Juliana Moore

vs
St Louis Iron Mt.
Railroad Co

for debt

N. de Camp

J. W. Wilson

Saml. Tilton

J. W. Arisman

COUNTY OF JEFFERSON.

THE STATE OF MISSOURI,

To Henry Barrett, Mark Johnson, Mr. Cowan
George Keel, Joseph Cavanaugh

GREETING :

You are Herby Commanded, That setting aside all
manner of excuse and delay, you appear before our Circuit Court for the County afore-
said, on the 21st day of November next at Hillsboro, then and there
to testify, and the truth to say in a certain matter of controversy, now pending in our
said Court, wherein *Sullivan & Co. vs. By next friend*

Plaintiff and *the St Louis & New Orleans Railroad*

Defendant on the part of *Plaintiff* and herein you are in no wise to fail.

WITNESS, ELIAS F. HONEY, Clerk of our said Court,
with the Seal thereof hereto affixed, at office, this

15th day of *Oct* A. D. 186

Elias F. Honey

Clerk.

SUBPOENA

TO JEFFERSON CIRCUIT COURT.

November Term, 1864

Juliana Morse & by

vs

St Louis & Iron Mt R R Co

for Plff

Henry Voretz

Wat. Johnson

Dr. Evans

George Hall

Joseph. Orinman

COUNTY OF JEFFERSON.

THE STATE OF MISSOURI,

To *William Blank, Daniel Burges*

GREETING :

You are Herely Commanded, That setting aside all manner of excuse and delay, you appear before our Circuit Court for the County aforesaid, on the *2nd day of November next* at Hillsboro, then and there to testify, and the truth to say in a certain matter of controversy, now pending in our said Court, wherein *William Blank by next friend*

Plaintiff and *the State of Missouri Rail Road Co*

Defendant on the part of *defendant* and herein you are in no wise to fail.

WITNESS, ELIAS F. HONEY, Clerk of our said Court,

with the Seal thereof hereto affixed, at office, this

15th day of *Octo* A. D. 186 *4*

Elias F. Honey
Clerk.

SUBPOENA

TO JEFFERSON CIRCUIT COURT.

November Term, 1864

Juliana Morse

vs
St Louis & Iron Mount
Railroad Co.

for debt

William Blank
Danl. Burgan

John H. Wells administrator
of Juliana Wells Plawitt
vs
Lewis & John Mountain
Debt Road Company defendants

On the Circuit
Court of Lewis
County, Wisconsin

To the Lewis & John Mountain Rail
Road Company, you are hereby notified that
depositions of witnesses to the road in evidence
in the above cause on the part of the plain-
tiff will be taken at the office of Lewis
Wm Lang Esq on 25th Dearborn Street, city
of Chicago between on the first day of March
1886 between the hour of 8 o'clock in the
forenoon and six o'clock in the afternoon
of that day of A. Deal Atty for Plaintiff

detained a copy of the entire letter by leaving
because the northern sector by leaving a copy of this
same with the person in charge of Webster's American
Road Company at the business office of the Company in
the absence of the President or other chief officer of said
Company on the 31st day of January 1866

J. A. Dea

The State of Missouri,

To any judge or justice of the peace, or any mayor or chief magistrate of any city in the State of Illinois, Greeting.

Know Ye, That reposing confidence in your ability, we do hereby empower you to cause to come before you on the first day of March 1866, at the office of Lewis Unlaur, Esqr No 256 Dearborn Street, in the City of Chicago, Illinois, Phillips and the said Phillips to examine

on oath touching his knowledge of a cause now pending in the Jefferson County Circuit Court, wherein John H Morse administrator of Julianna Morse, is Plaintiff & The Saint Louis and Iron Mountain Rail Road Company are defendants. The examination of the said Phillips,

this taken you will reduce to writing & cause him to subscribe the same, and the examination thus taken and subscribed, you will certify to the Clerk of the Circuit within and for the County of Jefferson under your hand.

Witness Saml. A. Peppy, clerk of our said Circuit Court, with the Seal thereof thereto affixed, at the Town of Keokuk, this 9th day of February 1866, Saml. A. Peppy clk

The Deposition of Charles G. Phillips, a witness of lawful age, produced, sworn and examined on the first day of March A.D. 1866 between the hours of eight o'clock in the forenoon and six o'clock in the afternoon of that day at the office of Lewis Umlauf Esq. No 156 Dearborn Street in the city of Chicago, County of Cook and State of Illinois before me Lewis Umlauf, a notary public in and for said city of Chicago, duly appointed by the Governor of the State of Illinois in a certain cause now pending in the Circuit Court of Jefferson County, Missouri, between John H. Morse, administrator of the estate of Julianna Morse plaintiff and the Saint Louis and Iron Mountain Rail Road Company defendants, on the part of said plaintiff.

The said Charles G. ~~Mc~~ Phillips, being by me first sworn according to law, as witness in the said cause previous to the commencement of his examination to testify the truth as well on the part of said plaintiff as the said defendants in relation to the matters in controversy between the said plaintiff and the said defendants, testified and deposed as follows, that is to say:

I have been well acquainted with Julianna Morse of Jefferson County Missouri, now deceased. I know the land owned by said Julianna

Morse in Jefferson county, Missouri; it is situated at Tunnel Station on both sides of the track of the Saint Louis and Iron Mountain Rail Road in said Jefferson county. Julianna Morse resided on the said land, her farm, in the Spring of 1863, during which said time I was with her on a visit on her said farm at Tunnel Station. While I was staying at the house of Julianna Morse on her said farm at Tunnel Station Julianna Morse had cut and piled up on her said land about two hundred and fifty cords of wood, this wood was cut on the said land of Julianna Morse and was the property of Julianna Morse, she then being the wife of David W. Morse. The Saint Louis and Iron Mountain Rail Road Company in the Spring of 1863, while I was staying with said Julianna Morse on her said premises, without leave or authority took and carried away the said two hundred and fifty cords of wood, the said wood being then the property of said Julianna Morse, and ~~converted~~ converted and applied the said wood to their own use, that is to say, to the use of the Saint Louis and Iron Mountain Rail Road Company. - I know this to be the fact because I saw the employees of this Saint Louis and Iron Mountain Rail Road Company take and carry off the said wood and pile it up at said Tunnel Station near the Station house

and seen their Rail Road track. I saw
some of this Wood afterwards loaded on the
cars of the Saint Louis and Iron Mountain
Rail Road Company at said Tunnel
Station, where it had been deposited and
piled up by the said Rail Road Company.
The said Wood which the Saint Louis and
Iron Mountain Rail Road Company took
from the premises of Julianna Morse and
had converted and applied to the use of
the Saint Louis and Iron Mountain Rail
Road Company at the time it was taken
by the said Rail Road Company was
worth four Dollars per cord. I know
the said Julianna Morse never sold the
said Wood to the said Saint Louis and
Iron Mountain Rail Road Company.

Charles E. Phillips

Subscribed and sworn to before me on the
the day, at the place and within the terms
first aforesaid. And I certify that I am
a Notary Public in and for said City of
Chicago, duly appointed by the Governor of the
State of Illinois, and I further certify
that in pursuance of the annexed Com-
mission and notice came before me

at the office of Lewis Umlauf at
Number 156 Dearborn Street in the city
of Chicago, County of Cook and State
of Illinois Charles G. Phillips, who was
by me sworn to testify the whole truth of
his knowledge touching the matters in
controversy aforesaid, that he was examined
and his examination reduced to writing and
subscribed by him in my presence on the
day, between the hours and at the place
in that behalf first aforesaid, and his
said deposition is now herewith returned.
I do further certify that said Charles
G. Phillips of the city of Chicago, Illi-
nois.

Witness my hand and notarial
seal at Chicago, Cook County, Illinois
this first day of March A.D. 1866.



Lewis Umlauf
Notary Public

John. H. Morse
Administrator of
of William Morse

Agencies
St Louis & D. M. E. R.
Company

Received by Mail
opened and

Filed March 23rd 1866

Saml. A. J. M. R.
R. M.

Juliana Morse

vs.
The St. Louis and Iron Mountain
Railroad Company - Defendants

In the Jefferson Co.
Circuit Court
November
Term 1866

The defendants in the above entitled cause pray
the Court that the venue may be changed from the Circuit
Court of Jefferson County to any other county in the State of
Missouri (except the county of Washington) for the
cause that the inhabitants of the counties of Jefferson
and Washington are prejudiced against said Company
and that the plaintiff has undue influence over the
inhabitants of the counties aforesaid.

Geo B. Kellogg Attorney for
Defendants

State of Missouri

County of St. Louis

Stephen D. Barlow President of the
St. Louis and Iron Mountain Railroad
Company makes oath and says that he believes the
foregoing petition and the matters as stated therein are
true and that the defendants have just cause to
believe that they cannot have a fair trial in account
of the causes alleged above.

Sworn to and subscribed before me
this Sixth day of November
A.D. 1866

John M. Fulton
Notary Public

J. D. Barlow

Hoovers

Wile, July 5. 2 cups per 60¢ 2 Cents Head 1¢
2 mts 2¢ 2 cups 40¢ 4 weeks. 5¢

Ben 50 aft. 10¢ 4 cups 1.15

Reply

and 55 has 5 diles 10¢ 1 cup 25¢
dudg. 50¢ each 30.

65
80 145

some shifts

some 2 shifts

200

call. 20¢ 4 cups

4 to

600

Wile 1 cup 50 cups 40

90
15