

Jefferson County Circuit Court
Case File - Civil

Box

16 Folder 66

November 1865, #72

Null, Elizabeth, by next friend
Hortine, Mary A.
vs.

Null, William

Divorce

Married 3 May 1857; adultery

Elizabeth Full { In the Circuit
vs { Court of Jefferson
William Full { County Missouri

Plaintiff by her next friend Mary
A. Horne states that on the 3rd
day of May 1857 in the
County of Jefferson in the State
of Missouri she was lawfully
married to the Defendant that
plaintiff continued to live with Defen-
dant as his wife from & after the
day & year aforesaid until the
day of April 1862 that
during all that time plaintiff
faithfully demeaned herself and
discharged all her duties as the
wife of the Defendant and at all
times treated him with kindness
& affection but that said Defendant
wholly disregarding his duties
as the husband of the plaintiff
has been guilty of open and
notorious adultery since the
marriage and within the last ~~two~~
three years

2nd And has offered such indignities to
plaintiff since the marriage &
within the last three years as to
render her condition intolerable
in this that Defendant since his
separation with Plaintiff has

pretended to get married with
another woman, and has openly
and notoriously represented said
woman to be his wife and has
lived and cohabited with her
as such

Plaintiff further says
she has resided within this State
one whole year next before the
filing of this petition.

Plaintiff further
says that Defendant is seized and
possessed of personal property &
money to the value of four or
five hundred Dollars & that
she is wholly without the means of support
and for the prosecution of this suit

Plaintiff therefore prays to be
divorced from the bonds of Matrimony
contracted as aforesaid with
the Defendant and that the Court
will adjudge to her such support &
maintenance out of the property
of the Defendant & for such
time as the nature of the case
and the circumstances of the
parties may require & necessary
to compel the Defendant to
give security for such mainten-
ance and to make such further
orders from time to time.

Concerning the same as may be
just & such other orders &
judgments touching the premises
as may be right and proper

Jos Williams
Atty. for Plaintiff

This Affiant the plaintiff make oath
and says that the facts stated in
the above petition are true to
the best knowledge 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 mentioned in the
petition.

Sworne to and
Subscribed before
me July 20th 1865.
Samuel Keppy clk

Elizabeth Hall
mark

Elizabeth Hull } In the circuit
vs } Court of Jefferson
William Hull } County Missouri,

Plaintiff by her next friend
Margt A. Horner states that on the
^{30th} day of May 1857, in the County
of Jefferson in the State of Missouri
she was lawfully married to the De=
fendant that plaintiff continued to
live with Defendant as his wife
from & after the day & year aforesaid
untill the day of April 1862,
that during all that time plaintiff
faithfully demeaned herself and dis=
charged all her duties as the wife of
the Defendant and at all times
treated him with kindness & affec=
tion but that said Defendant
wholly disregarding his duties as the
husband of the plaintiff,
1st has been guilty of open and notorious
Adultery since the Marriage and
within the last three years,
2nd And has offered such indignities
to plaintiff since the Marriage &
within the last three years as to ren=
der her condition intolerable in this
that Defendant since his separation

with plaintiff has pretended to get married with another woman and has openly and notoriously represented said woman to be his wife and has lived and cohabited with her as such.

Plaintiff further says she has resided within this state one whole year next before the filing of this petition.

Plaintiff further says that defendant is seized and possessed of personal property & money to the value of four or five hundred dollars & that she is wholly without the means of support and for the prosecution of this suit.

Plaintiff therefore prays to be divorced from the bonds of matrimony contracted as aforesaid with the defendant and that the court will adjudge to her such support & maintenance out of the property of the defendant & for such time as the nature of the case and the circumstances, of the parties may require & necessary to compel the defendant to give security for such maintenance

And to make such further orders from time to time concerning the same as may be just & such other

orders & judgments touching the
premises as may be right and
proper.

JOH. J. WILLIAMS
att. for plaintiffs

This affiant the plaintiffs make
oath and says that the facts stated
in the above petition are true to the
best knowledge and belief of the plain-
tiffs, and that the complaint is not
made out of levity or by collusion
fear or restraint between the plaintiffs
and defendant for the mere purpose
of being separated from each
other but in sincerity and truth
for the causes mentioned in the
petition

Sworn to and
Subscribed before
me July 20th 1865

Elizabeth ^{her} X Hull
mark

Samuel K. Reppy clk



The foregoing is a true and
correct copy of the original petition
and affidavit on file in my
office

Witness my hand and
the seal of said court
at office this day of
A.D. 1865

Samuel A. Rappin

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

The State of Missouri

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

We command you, that you summon

William Hull

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

Elizabeth I. Hull

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

Witness, Samuel A. Peppy, Clerk of our said Circuit
Court, with the seal thereof hereunto affixed, at office
in Hillsboro, this Twenty Second
day of November A. D. 1865

Samuel A. Peppy
Clerk Circuit Court.



I executed the within writ at the County of
Jefferson Missouri on the 23rd Nov 1865 on the
Rule by delivering to him a copy of this writ and
annexed petition as follows to me by the clerk

C. C. Fletcher
Sheriff



472

TO JEFFERSON CIRCUIT COURT

May Term, 1865

Elizabeth A. Hall

vs

William A. Hall

23 Nov 1865

C. C. Fletcher Sheriff

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

The State of Missouri St. Francois

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

We command you, that you summon

William Hull

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 *November* next, then and there to answer unto

Elizabeth Hull

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

Witness, *ELIAS D. HENRY*, Clerk of our said Circuit

Court, with the seal thereof hereunto affixed, at office

in Hillsboro, this *Twentieth*

day of *September* A. D. 18*65*

Samuel A. Reppy

Clerk Circuit Court.

The within named Wm Hull is not
found in my County

C C Fletcher
Sherriff

72

TO JEFFERSON CIRCUIT COURT

2406

November Term, 1865

Elizabeth Hull

vs J. Summers

William Hull

Sherriff - 73-

Copy for
Department