

DeFleeson County Circuit Court
Case File - Civil

Box

17

Folder 55

June 1866

Greer, Matilda by next friend
Davis, John
vs

Greer, Samuel

Divorce

Married 28 January 1866; abuse

Mahilda Greer, Plff.

^{vs}
Samuel T. Greer Defendant

In the circuit court of
Jefferson County Mo.

by her next friend John Davis
Plaintiff, States that she was Lawfully
married to the Defendant in Jefferson
County Missouri on the 28th day
January 1866 that plaintiff contin-
ued to live with the Defendant as
his wife from and after the day
and year aforesaid until ~~about~~
the 14th day of June 1866 that
during all that time plaintiff
faithfully demeaned herself and
discharged all her duties as the
wife of the Defendant and at
all time treated him with kindness and
affection but that the Defendant
wholly disregarding his duties as the
husband of the plaintiff. Shortly
after the marriage of plaintiff with
him as aforesaid ^{he Defendant} commenced treating
offering such indignities to plaintiff
and has continued to offer such
indignities to plaintiff up to the 14th
of June as aforesaid as to render
her condition intolerable, that is to say

Defendant within a few days after his marriage with plaintiff commenced ~~abusing~~ and has almost daily continued to use the most violent and threatening language to plaintiff, by threatening to whip plaintiff and to slap her faces and by scolding and abusing plaintiff almost daily in the most violent manner in the presence of his family as well as in secret. And by treating the children of plaintiff in ~~the~~ a most brutal and outrageous manner so as to endanger their lives. And by

putting up written advertisements, ^{on the 12th day of June 1866} in divers public places ~~and~~ on the doors of divers stores in said County of Jefferson and within the circle of plaintiff's acquaintance notifying all persons not to trade with or give credit to plaintiff on his account and stating that plaintiff had left his bed and board without any just cause or provocation when in truth and in fact plaintiff had not left ~~the~~ or abandoned the Defendant as stated in said advertisement nor manifested any disposition to do so, but Defendant put up said advertisements with a view and for

the purpose of bringing Plaintiff
into public scandal in the community.
Plaintiff further states that she has
resided in this State more than one whole
year next before the filing of this petition.
Plaintiff further states that said Defend-
-ant is seized and possessed of Real and
personal Estate and money of the value
of Three Thousand ^{One hundred} Dollars and that she
is wholly without the means of support
or for the prosecution of this suit.
Plaintiff prays the Court therefore that
she may be divorced from the Bonds
of matrimony contracted as aforesaid
with the Defendant and that the Court
will adjudge to her such support and
maintenance out of the property of the
Defendant and for such time as the
nature of the case and the circumstances
of the parties may require and if neces-
sary to compel the Defendant to give
security for such maintenance. Plaintiff
further says that at the time of her
marriage with Defendant she owned
personal property of the value of Two
hundred Dollars that the same was
taken by Defendant into his possession
and is still retained by him that is to
say one more of the value of one hundred

Dollars, Twelve head of sheep of the value
of Thirty Six Dollars, and house hold &
Kitchen furniture of the value of Sixty
five Dollars, Plaintiff further
prays the court for judgment against
Defendant for the possession of said
property or for Two hundred Dollars
the value thereof and that the court
will from time to time render such
other & further orders and judgment in
the premises as may be just and right

Jo: J. Williams
for Plaintiff

Matilda Greer makes oath and says
that the facts stated in the above petition are
true according to the best of her knowledge
and belief and that the complaint
is not made out of envy or by collusion
fear or restraint between 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 June 14th 1866
Wm. M. Mullin Clerk of Court

her
Matilda Greer
mark

~~2548~~
2548

Matthew Green

J. J. Green

Petition for Divorce

Filed June 14th 1866
and at the City
of Concord

Let proceedings
be taken
for 12th.

Matilda Greer, By her }
Next friend, John Davis, - Plaintiff }
Against }
Samuel T. Greer, - Defendant }
In the Circuit Court of }
Jefferson County Missouri, }

The Plaintiff by her Next Friend, John Davis, states that some time in January 1866, in Jefferson County Missouri, she was lawfully married to the Defendant, - that she continued to live with him as his wife from & after the day and year aforesaid, until some time in June 1866, when the Defendant without any just cause or provocation forcibly drove Plaintiff from his home, but shortly afterwards, in the month of July 1866, the Defendant, for the purpose of cheating and defrauding Plaintiff out of her marital rights, persuaded her to return and live with him again. She accordingly went back, hoping to live with him amicably and continued to live with him as his wife, until in March 1866, - during all which 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, the Defendant wholly disregarding his duties as the husband of Plaintiff, became very quarrelsome and abusive towards Plaintiff, and about the last of March aforesaid, the Defendant undertook fraudulently to convey his property to his children to deprive Plaintiff from ever receiving any benefit of it, - and did

wrongfully, abuse, assault and beat Plaintiff, and
inflict upon her great personal injury, by striking
her in the face and choking her, and bruising
so badly that she suffered great pain & bodily
injury for several weeks - and Defendant by
such ^{and by threatening her life} cruel treatment, Compelled Plaintiff
to sign certain Deeds to enable him to carry out
the frauds aforesaid. - Plaintiff therefore charges
that the Defendant has been guilty of such
Cruel and barbarous treatment towards her as
to endanger her life. - Plaintiff further charges
that Defendant, after assaulting & beating her as
aforesaid, Compelled her to leave his house and
depend upon her friends & personal labor for ^{her} sup-
port, - and that he set up various Notices in the
neighborhood, to prevent her obtaining any credit
upon his account, - and leaving her thus without
any means of support, or of obtaining any credit.
Plaintiff charges that Defendant, by such mean,
selfish, and illiberal conduct as aforesaid ~~the De-~~
~~endant~~ has offered such indignities to her as
to render condition intolerable. - Plaintiff states
that she has resided within this State one whole
year next before the filing of this petition. - Plain-
tiff further states that the Defendant is seized
and possessed of Real and Personal estate of the
value of about three thousand dollars, and that
she is wholly without the means of support, and
for the prosecution of this suit. - Plaintiff there-
fore for the Causes above alleged, prays to be divorced
from the bonds of Matrimony, Contracted as aforesaid
with the Defendant; that she be restored to her
former name, that of, Matilda Wilson, - and that the

Court will adjudge to her such support and maintenance, out of the property of the said Defendant, and for such time as the nature of the case, and the circumstances of the parties may require, and if necessary) Compel the Defendant to give security for such maintenance, and to make such further orders, from time to time, touching the same as may be just, and such other orders and judgments touching the premises as may be proper.

A. Green, & J. L. Thomas
Attorneys for Plaintiff

This Affiant, Matilda Greer, the Plaintiff, makes oath and says the facts stated in the above petition are true according 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 the 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 & subscribed
before me May 3rd 1867
Elias J. Keeney Clerk

Matilda Greer
mark

1 copy per

affid.

stamp

emb. stamp

file per

envelope

100

25

50

110

5

5

In Circuit Court
Hoffman County

Matilda Green
(vs.)

Samuel V. Green

Petition for Divorce,

Let summons issue

Green & Thomas
for R. G. & Co.

Filed May 3^d 1867

Elias J. Kearney clerk

34 paid by Plff.

THE STATE OF MISSOURI, }
COUNTY OF JEFFERSON. } SS.

THE STATE OF MISSOURI,

To the Sheriff of the County of Jefferson—Greeling:

We command you, that you summon *Samuel J Greer*

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 *Sixth* Monday after the
fourth Monday of September next, then and there to answer unto
Matilda Greer, by her next friend
John Davis

upon *her* original petition, a copy whereof is hereunto annexed and
accompanies 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
Thurs day of *May* A.D. 18*67*
Elias F Honey
Clerk Circuit Court.



No 64

2548
TO

JEFFERSON CIRCUIT COURT.

November Term, 1867

Matilda Green by her
next friend John Davis
vs } Defendants

Samuel J Green

John Williams Sheriff
fee \$1.00

I Executed this Writ in the County of Jefferson
State of Mo on Samuel J Green on the 24th
Day of June 1867 By Leaving a true copy
this Writ and Petition at his usual Place
of abode With a White Person of his family
over the age of fifteen years
John Williams Sheriff

Green }
20

Green, 1, copy put, \$1, affd, 20, 1,25

Stamp 3-6, with recd, \$1,10 files 5, doc 10, 1,75

Dis 25, Ino 10, Indgt, 30, Ino to do, 10, 95

Costs, 25, P.B. or \$1,00, affd, 10, 1,25

5,20

John Williams Shff, sero defd, \$1,00

Calls 10, \$1,10

6,30

Antpd by Shff

3,00

9,30

John

9,30