Platte County Circuit Court
Circuit Court
March Term 1851

Box 20. File 14.1

Freeland, John W.

vs

Freeland, Rebecca

Divorce

John W. Freeland
vs
Rebecca Freeland

Petition for Divorce

In the Circuit Court
of March term 1857
Platte County Mo.

The Plaintiff John W. Freeland would respectfully represent that on or about the ninth day of September Eighteen hundred and forty four he was married to the defendant then named Rebecca Eldridge in Platte County Missouri - that they lived and Cohabited together as husband and wife until about the twentieth day of October Eighteen hundred and fifty when the Defendant without any reason whatever left the bed and board and house of plaintiff avowing her determination not to live with plaintiff as her husband again - that she has never returned to his house to live since and persists in her determination to break off said marriage vow - Court at the County aforesaid - Plaintiff avers that he has always treated his wife the defendant with kindness and has done his whole duty towards her as a husband - he further avers that defendant has not treated him with affection or the least consideration from the beginning, that her conduct towards him grew more and more unkind, until the spring of 1850 she threw off

all pretentions to respect and became openly offensive and abusive to him and of him at home and abroad so that his life became in that situation entirely insupportable so far was this continued ill treatment carried that plaintiff's mind was impaired under its influence that she in combination with her father, mother and brother commenced and carried on a series of ill-treatment abuse, threats and insults to the extent that his life was seriously endangered and in and through these means offered such indignities to his person as rendered his condition intolerable that her brother was quartered upon him to bully and insult him upon all occasions even at his own table, going continually armed, that her father was armed and constantly threatening what would be done with a view to force plaintiff to convey his property to him and leave the Country that under the influence of these threats plaintiff did convey to her father his farm and house, without a dollar having executed his note to defendant for about Eighteen hundred dollars, the day or two before this conveyance took place her father came to Plaintiff and told him that unless he this conveyed his land and left the Country his life would certainly be taken, and plaintiff then believed it, and now firmly believes the fact

that it was the object of the family to get his property and force him by threats and abusive treatment and continued insults to drive him away so as to throw the blame of the separation on the Plaintiff + That defendant was in the constant habit of talking in terms of the greatest disrespect of Plaintiff from home she was in the constant habit of saying that she did not love him or respect him, that he was not in his right mind, that she intended to leave him: that he came very near dying in a spell of sickness he had in the winter of 1849 and 1850 that she expected him to have another spell in the winter of 1857 - and she had no doubt it would kill him, and she would stay until after that time and if it did not kill him, she would then leave him - And Plaintiff avers that he believes if he had undergone another spell of sickness he would have died if not by disease by other means for he believes it was fully set in her to destroy him, so soon as the property could be procured by will or otherwise, and Plaintiff is confirmed in this by the fact that on the very next day after they procured the conveyance of his property she left and took from the house every article of property except the clothing of Plaintiff taking with her of Plaintiffs own property some four or five hundred dollars worth of

/wpsuty - Plaintiff therefore asks the Court to divorce him from the bonds of matrimony by him contracted with Defendant -

Hughes Norton Rees
Attys for Plff

State of Missouri } ss
County of Platte } John W. Fuland

makes oath and says that the facts stated in the foregoing bill are true so far as stated of his own knowledge and so far as stated on the information of others he believes them to be true. That the complaint is not made out of levity or by collusion, fear or restraint between the complainant and defendant for the mere purpose of being separated from each other but in sincerity and truth for the causes mentioned in said petition

John W. Fuland

Subscribed & sworn to before me this 28th January 1857 -

Ira Norris Clk

State of Missouri County of Platte. ss-

I Ira Norris Clerk of the Circuit Court within and for the County aforesaid certify that the within and foregoing is a full true and complete copy of the petition of John W. Fuland plaintiff against Rebecca ~~Fuland~~ defendant, filed in my office on the 28th day of January A.D. 1857 as the same now remains on file in said Court. In testimony whereof I have hereunto subscribed my name and affixed the seal of said Circuit Court at office in Platte City this the 28th day of January A.D. 1857 -

Ira Norris, Clk

John W. Freeland

vs. Pet.

Rebecca Freeland

John W. Freeland

vs } Petition for Divorce.

Rebecca Freeland

In the Circuit Court of
March term 1857.

Platte County Mo.

The plaintiff John W Freeland would respectfully represent that on the or about the ninth day of September Eighteen hundred and forty five he was married to the defendant then named Rebecca Eldridge in Platte County aforesaid - that they lived and cohabited together as husband and wife until about the Twentieth day of October Eighteen hundred and fifty, when the Defendant without any reason whatever left the bed and board and home of plaintiff avowing her determination not to live with plaintiff as her husband aforesaid - that she has never returned to his home to live since and persists in her determination to break off said marriage vow - that at the County aforesaid

Plaintiff avers that defendant he has always treated his wife the defendant with kindness and has done his whole duty towards her as a husband, he further avers that defendant has not treated him with affection or the least consideration from the beginning that her conduct towards him grew more and more unkind, until the spring of 1850. She threw off all pretensions to respect and

became openly offensive and abusive to him and off him at home and abroad so that his life became in that situation entirely insupportable, so far was this continued ill-treatment carried that Plaintiffs mind was impaired under its influence - that she in combination with her father, mother and brother commenced and carried on a series of ill-treatment abuse, threats and insults, to the extent that his life was seriously endangered, and in and through them means offered such indignities to his person as rendered his condition intolerable, that her brother was granted upon him to bully and insult him upon all occasions even at his own table, going continually armed, that her father was armed, and constantly threatening what would be done with a view to force plaintiff to convey his property to him and leave the country that under the influence of these threats plaintiff did convey to her father his farm and home, without a dollar having executed his note to Defendant for about eighteen hundred Dollars, the day before this conveyance took place his father came to ~~Defendant~~ Plaintiff and told him that unless he then signed his deed and left the country he left would certainly be taken, and plaintiff then believed it, and now firmly believes the fact, that it was the object of the family to get his property and

from him by threats and abusive treatment and contrived insults to drive him away so as to throw the blame of the separation on the plaintiff - That defendant was in the constant habit of talking in terms of the greatest disrespect of plaintiff from home she was in the constant habit of saying that she did not love him, or respect him, that he was not in his right mind, that she intended to leave him, that he came very near dying in a spell of sickness he had in the winter of 1849 and 1850. that she expected him to have another spell in the winter of 1857 - and that had no doubt it would kill him, and she would stay until after that time and if it did not kill him she would then leave him - And plaintiff avers that he believes if he had undergone another spell of sickness, he would have died, if not by disease, by other means, for he believes it was fully set in her to destroy him, so soon as the property could be procured by will or otherwise, and plaintiff is confirmed in this fact by the fact, that on the very next day after they procured the consignment of his property, she left and took from the house every article of property except the clothing of plaintiff, taking with her of plaintiffs own property some four or five hundred dollars worth of property - Plaintiff therefore asks the Court to divorce him from the bonds of matrimony by him contracted with the

Defendant,

Hughs Sutton & Rees attys for Pl'ff.

State of Illinois }
County of Platte } ss. John W Freeland makes oath and says that the facts stated in the foregoing bill are true so far as stated of his own knowledge and so far as stated on the information of others he believes them to be true, that the Complaint is not made out of levity or by Collusion, fear or restraint, between the Complainant and defendant, for the mere purpose of being separated from each other, but in sincerity and truth for the causes mentioned in said petition

John W. Freeland

Subscribed & sworn to before me this 28th January 1851

Jas Norris Clerk

Com'r Injunction Records E. page 93

Complainant's Bill filed Jan'y 28, 1851. Affidavit & Bill for costs. Subpoena issued Jan'y 28, 1851. Affidavit & Bill for costs. Subpoena issued Jan'y 28, 1851.

John W Freeland
Complainant's Solicitor

Rebecca Freeland
Defendant

The Clerk will please issue an Injunction as prayed in complainant's bill

Jas Norris Clerk

Filed January 28th 1851
Jas Norris Clerk
5 Sheets fee $1.00

John W Haeland }
vs } In the State Circuit
Rebecca Haeland } Court of Monroe Term
No D 1851

The Defendant demurs to the petition of Plaintiff, because it does not states facts sufficient to Constitute a Cause of action, in this that said Petition alledges no fact which Constitutes a Cause for divorce as provided by Statute in such Cases made and provided

Hardin Marshall & Dougherty
for Def

John W Shirland
vs
Jesse Denman
Robert Shirland

Demurrer to
Petition

No 19

Filed March 6. 1851
Jas Harris Clk

STATE OF MISSOURI, } Sct:
COUNTY OF PLATTE, }

The State of Missouri, to the Sheriff of Platte County==Greeting:==

You are hereby commaded to summon Rebecca Ireland

that She be and appear before the Judge of our Platte Circuit Court on the first day of the next term thereof, to be holden at the Court House, in Platte City, on Monday the 3d day of March next, then and there to answer unto the Petition of John M. Ireland

Wherein fail not, and have you then there this writ.

Witness, IRA NORRIS, Clerk of said Circuit Court, with the seal thereof affixed at Platte City, on this 28th day of January A. D. 185/.

Ira Norris Clk

A true Copy Test Ira Norris Clk

STATE OF MISSOURI, } Sct:
COUNTY OF PLATTE, }

The State of Missouri, to the Sheriff of Platte County—Greeting:—

You are hereby commaded to summon Rebecca Freeland

that She be and appear before the Judge of our Platte Circuit Court on the first day of the next term thereof, to be holden at the Court House, in Platte City, on Monday the 3d day of March next, then and there to answer unto the Petition of John M. Freeland

Wherein fail not, and have you then there this writ.

Witness, IRA NORRIS, Clerk of said Circuit Court, with the seal thereof affixed at Platte City, on this 28th day of January A. D. 185/.

Ira Norris Clerk

"The within Executed by reading the within
Writ and Petition hereto annexed to the
Mrs Rebecca Haviland, the Defendant
herein named, and delivering to
said Defendant a copy of both the
within Writ and Petition above
mentioned on the 30th day of January
A.D. 1857 in Platte County Missouri

L. Shepard, Shff
By J. H. Ascendon Dept. S.

In the Circuit Court,
of Platte County, Mo.

John W. Freeland, Plaintiff
against
Rebecca Freeland, Defendant
} Petition.

John W. Freeland, Plaintiff, states that on the 9th day of September, A.D. 1845, he was intermarried with one Rebecca Eldridge, in the County and State aforesaid, that he, the said Plaintiff and the said Rebecca lived together for about the period of five years, to-wit: about the 20th day of October, 1850; that at the period last mentioned the said Rebecca left him, said Plaintiff, without any cause whatever on his part; that the said Rebecca has been absent from him, the said Plaintiff, for more than two years; that said Rebecca Freeland, the defendant, plaintiff has reason to believe and does believe, has been, and now is, residing out of the State of Missouri. The Plaintiff further alledges that said defendant, whilst living with him, treated him with great indignity and inhumanity to ~~that~~ the Plaintiff's prays the Court that on account of the non-residence of the said Rebecca Freeland in the State of Missouri, an order of publication be granted, and that the bonds of matrimony subsisting between, said plaintiff, John W. Freeland, and the defendant, Rebecca Freeland, be dissolved by this

Court

Wilkinson & Rees, attorneys for plaintiff

John W. Freeland

State of Missouri,
County of Platte }

The Plaintiff, John W. Freeland, makes oath and says that the facts stated in the petition are true, according to the best knowledge and belief of the complainant, and that the complaint is not made out of levity or collusion, fear or restraint, between the complainant and defendant, for the mere purpose of being seperated from each other, but in sincerity and truth, for the causes mentioned in said petition.

John W. Freeland

Sworn to and Subscribed before me this 16 Dec 1852

W. A. Smyth Clk

John W. Freeland
vs. Petition
Rebecca Freeland

Filed Dec 16 1852
M. E. Pennington
Clerk

John W. Gardner

vs. } Petition for Divorce

Rebecca Gardner

The defendant demurs to the petition of Plaintiff, for the following reasons,

1. Because the petition does not state that the desertion of ~~defendant~~ of plaintiff by defendant was "willful".

2. Because the desertion of ~~defendant~~ plaintiff by defendant is not charged at all.

3. Because the plaintiff does not specify in his petition what acts defendant has guilty of that constitute "personal indignities." The general charge being insufficient.

Wilson & Clark

Attorneys for Deft.

John B. Freeland

vs

Declaration

Rebecca Freeland

Filed March 5th

W. Rountree Clk

John M. Haviland
vs
Petition for a Divorce
Rebecca Haviland

The defendant moves the Court to set aside the decree in this Case and grant a new hearing, because the Court erred in refusing to permit defendant to introduce the evidence offered, and any other evidence she might offer.

Withrow & Clark
Atty for Deft

Jno. W. Haviland
by G. Pettibone for Dis
= ons —
Rebecca Haviland

Filed Sept 24 1853
N. C. Pennypacker
Clk

John W. Hankard
vs Petition for Divorce
Rebecca Hankard

Be it remembered that on the trial of the above case the plaintiff proved by several witnesses that he had married the defendant in Ripley County and lived with said wife, and also that defendant had absented herself from plaintiff without any reasonable cause for more than the term of two years. And the defendant appearing by her attorney upon the publications made in this case, offered to introduce witnesses to prove that plaintiff first absented himself from defendant, which the Court refused to hear, to which opinion of the Court in refusing to hear the testimony the defendant excepts. The defendant then offered to read in evidence the following instrument in writing showing the plaintiff's consent to the defendant's absence (here insert it) to which the Court refused to hear, or any other evidence from defendant on the ground that no answer had been filed by defendant, to which opinion of the Court the defendant excepts. This is all the evidence in the case. After argument and

=ence, defendant filed a motion for a new hearing which is in the words and figures following (here insert it) which the Court overruled, to which opinion of the Court in overruling the motion defendant excepts, and prays this his bill of exceptions to be signed sealed and made a part of the record in this cause, and it is done

E. H. Allen Judge

Filed

Geo. Hartland
Atty Plff in Error

Filed Sept 24. 1873
B. C. Pengelly
Clerk

In the Platte Circuit Court
Sept. Term 1853.

John W. Gruland
vs
Rebecca A. Gruland
Petition for Divorce

This affiant Joseph Eldridge as agent for the said defendant upon oath says that he asks an appeal in the above case, not for the purpose of vexation or delay, but because he believes that said defendant is aggrieved by the final decree or decree of this Court.

Joseph Eldridge

Sworn to and subscribed in open Court this 5th day of December 1853

W. C. Ramsey
Clk

D. W. Thurmond
et al
vs
Affidavit
Rebecca Thurmond

Filed Dec. 8. 1873
P. C. Pennington
Clk

Know all men by these presents that we Joseph Eldridge as principal and John Eldridge as Security are held and firmly bound unto John W. Haviland in the sum of One Thousand Dollars, for the payment of which we bind ourselves our heirs &c firmly by these presents. In testimony whereof we have hereunto set our hands and seals this 5th of December A.D. 1853.

The Condition of the above bond is such that whereas Rebecca Haviland has lately obtained a decree appealed from the Judgment of the Platte Circuit Court in the Chancery suit wherein said John W. Haviland is plaintiff and the said Rebecca Haviland is defendant for a divorce. Now if ~~said defendant shall pay all costs that may~~ the said defendant shall pay all costs and damages if said Judgment or decree shall be affirmed and shall prosecute her appeal with out delay and shall obey and perform such judgment order or decree as shall be made by the Supreme Court therein and pay all costs and damages as may be awarded against her then this bond to be void otherwise to remain in full force. Given this day and date above written.

Joseph Eldridge (Seal)

John Eldridge

John D. Freeland

et al

Rebecca Freeland

Filed Dec. 5 1865

W. C. Remington

Clk

In the Circuit Court Platte County

John H. Freeland plaintiff

against

Rebecca Freeland defendant

Plaintiff states that about the month of September 1845 he intermarried in Platte County Missouri with defendant — that plaintiff has resided in Platte County ever since — that plaintiff and defendant lived together as husband and wife until about the month of October 1850 when defendant unlawfully absented and absents herself from plaintiff without any reasonable cause and from thence hitherto has unlawfully absented herself from plaintiff without any reasonable cause for which was a period of more than two years next before the commencement of this suit.

Plaintiff states that defendant after marriage with plaintiff in Platte County — that when the said plaintiff she did not reside for a short time at her father's — but for a short time she stayed at Weston — that afterwards she left the County — that plaintiff is informed and believes that she has since married one [illegible] to be a man

abandoned Covenantes – to give
a bill of separation – Plaintiff
Charges that the has been
guilty of adultery since the
marriage aforesaid & before the Commencement of this
suit and with divers persons
unknown to Plaintiff unknown.

Plaintiff and Defendant live
in Chelsea – Plaintiff always
conducted himself towards Defend-
ant as a faithful husband
and never gave her any
Cause for the Grievances
aforesaid.

Plaintiff prays to be decreed
from the bonds of Matrimony and
during whereas Plaintiff and
Defendant are now further
ever-lived and cohabit as first
and Equitable.

Sworn Affidavit Read Forman
& Letts for Plff
Lord J. Finlay Says on oath
that the facts Stated in the foregoing
petition are true according to the
best knowledge and belief of Petitioner
and that Complaint is not made
out of levity or by Collusion with
or Connivance of Plaintiff and
Defendant for the purpose
of being Separated from each

After the 1st day of January A.D.
1834 the Parties mentioned
in the Articles of Copartnership
are dissolved by mutual consent

Witness our hands and seals this
31st day of March
1834

W. & R. Cunningham

N° 32

John M. Freeland

vs

Lucas

Robert Freeland

Action

Filed March 8. 1854

D. C. Pennington

Clk

John W. Freeland

vs

Petition for Divorce

Rebecca Freeland

The defendant moves the Court to strike out the Amended Cause for Divorce set out in said petition, that is that part of said petition which charges defendant with having become habituated, of having been guilty of prostitution, and of having committed adultery —

1. Because the same is irrelevant
2. Because said petition does not state the time, the place, at which the adultery is charged does committed, nor does it specify the person with whom such adultery was committed —

Adkins & Clark
Attorneys for Def't

No 157

John D. Freeland

vs

Exrs to

Attachment

Rebecca Freeland

Filed Nov. 22/64

W. Rankin

Clk

John N. Freeland

vs

Rebecca F. Land

Now here comes the plaintiff and moves the Court here to strike out defendants answer in this cause and allow for cause

That the cause is not known to as required by law

That the same is not sworn to

Pltf Pro Vdemus
Letter for Pltf

170

John M. Fruland

m 3 Junio

Rebecca Fruland

mother to Child

out of this world

Died May 24/84

Wm Remington

C.M.R.

Filed Mar. 24 1854

W. C. Rennie Jno.

Clk

Letter No. Thirteen
No. 2 Settings from Chapters
Thirteen Fourteen

The defendant moves the Court to strike out the second charge in plaintiff's petition, that is to say, that part which charges the defendant with prostitution and adultery.

1. Because the charge of prostitution is simple
= ment.

2. Because the charge of adultery is too general
and indefinite; in that the petitioner does not set out the time or place, nor does it charge the alleged adultery was committed in the Circuit Court of Cook County within the time alleged, nor does it set out with whom the alleged adultery was committed.

Wilson & Clark
Attys for Def't

Letter to Trustees
on Motion to the PO
and copy of petition
Rebecca Thurlow

Filed Mar. 24 1854
W. O. Pennington
Clk

Form 30. Husband
vs Petition for Divorce
Rebecca Husband

The defendant Cornes made Answer to the second amended petition & the is supplemented in law to the said second amended petition the is supplemented in law to the second Charge thereof, that is to say as to the Charge of prostitution and adultery, and thereupon Issue is joined as to the Second Count, as Second Charge in said petition, and Plaintiff by Counsel for demurrer in fact says, Reg 1. The Charge of prostitution is not a Cause of action,

2. The Charge of adultery is too general, vague and incipient to support an action, neither does it appear by the charge in the petition when or where the alleged adultery was committed or the Circumstances under which the the Parties were alone; Nor does the petition set forth with whom the alleged adultery was Committed.

Milum & Claiborne
Attys for Pltf

John M. Haviland

vs } Petition for
Divorce

Rebecca Haviland

Summons

Filed Mar 24 1854

W. C. Remington
Clk

John W. Fruland Plaintiff
vs Amended Answer
Rebecca Fruland Defendant

In the Circuit Court of Platte County
September Term 1854

Defendant as her amended Answer, to Plaintiffs Amended Petition herein filed against her would State— That She admits the Marriage as set forth in Said petition— Defendant denies, that on or about the Months of October or at any other time She wilfully deserted and absented herself from plaintiff without any reasonable Cause as charged against her in Said petition, or that She has from thence hitherto wilfully absented herself from Plaintiff without any reasonable Cause for the Period of time charged in Said petition— Defendant denies, that She has turned out to be an abandoned Character— Of the vice of prostitution as Charged against her in Said petition—

Defendant denies, that She has been guilty of adultery Since the Marriage aforesaid as Charged against her in Said petition—

Defendant States, that on or about the Month of October AD 1852, and after the Said Marriage & after having lived together as husband and Wife Plaintiff wilfully deserted and absented himself from Defendant without any Reasonable Cause and from thence hitherto he has wilfully absented himself from Defendant without any reasonable Cause, ~~which the~~ for a period of More than two years next before the Commencement of this Suit— Defendant

States and Charges the fact to be, that not only did the said Plaintiff desert & absent himself from dept as charged since the Promises aforesaid and but before the Institution of this Suit, the & Offended such indignities to this Defendant, as rendered her condition intolerable — That these indignities were repeated upon various occasions, as well before & previous to this desertion as aforesaid by Charging Defendant with infidelity - and with being guilty of adultery with various individuals the names of whom are not now recollected —

Defendant States, that She has made her residence in this County ever since the time of the desertion aforesaid and that the said Plaintiff has also resided in this County — Both of them having resided in this County for the period of two years next before the bring of this Suit — Plaintiff & said Defendant had no Children — Defendant States, that She has been a modest wife and always conducted herself as such, and never gave Plaintiff any cause for his conduct aforesaid

Defendant prays that the above be taken not only as an answer to said Plaintiffs petition, but also be considered in the Nature of a cross Bill, and that She be divorced from the bonds of Matrimony subsisting between Defendant and Plaintiff — Defendant States, that She is without pecuniary means being entirely dependent upon her father with whom She resides, that the said Plaintiff is in independent circumstances being possessed of a large amount of property and Money, Count of the amt of Seventy thousand dollars, - That Defendant prays that on order

as Master, as the time of decreeing said divorce as prayed for by defendant. Alimony, defendant such Alimony and Maintenance as the circumstances of the parties and Nature of the Case shall be considered reasonable. And the said Defendant prays for such other and further relief as may be deemed legal and Equitable, &c

William Elliott

Attorn for Defft

Rebecca M Freeland says on oath, that the facts stated in the foregoing ~~petition~~ Answer are true according to the best knowledge and belief of Defendant and that Complaint is not made out of levity or by Collusion, fear or restraint between Plaintiff and defendant for the mere purpose of being seperated from each other, but in sincerity and truth, for the Causes Mentioned in the above answer

Rebecca Freeland

Sworn and Subscribed to before me the undersigned Justice of the County Court within and for Platte County Missouri on this 8th day of September 1854

Robt Pleasants Justice County Court Platte Co Mo

John Ireland
vs Chancery
Rebecca Ireland

Amended Answer

Filed Sept 1854
By C. M. Enright
Clk

John W Ireland Plff
vs Amended Answer
Rebecca Ireland Defendant

In the Circuit Court Platte
County = September Term 1854

Defendant as her amended Answer to Plaintiffs amended petition heretofore filed against her — saith, That she admits the Marriage as set forth in said petition — Defendant denies that on or about the Month of October or at any other time she wilfully deserted and absented herself from plaintiff without any reasonable cause as charged against her in said petition or that she has from thence hitherto wilfully absented herself from Plaintiff without any reasonable cause, as charged in said petition — Defendant denies, that She has turned out to be an abandoned Character — to live a life of prostitution as charged against her in said petition — Defendant denies, that She has been guilty of adultery since the Marriage aforesaid as charged against her in said petition —

Defendant States, that on or about the Month of October A D 1850 and after the said Marriage & after having lived together as husband and wife Plaintiff wilfully deserted and absented himself from defendant without any reasonable Cause and from thence hitherto

he has wilfully absented himself from Depen-
-dant without any Reasonable Cause for a period
of More than two years next before the Commencement
of this Suit— Defendant Charges the fact
to be, that Plaintiff since the Mar-
-riage aforesaid and before the institution of
this Suit offered such indignities to Defendant
by Charging Defendant with the Commission of
Adultery— Charging him with an attempt to
Poison him as to render his Condition intole-
-rable— Defendant States, that She has
made her residence in this County ever since
the time of the desertion of Plff as aforesaid
That both Plaintiff and Defendant has resided
in this County for the period of two years
before the bringing of this Suit— Plaintiff
and Defendant had no Children— Defendant
States, that She has been a prudent wife and
always conducted herself as such, and never
gave Plaintiff any cause for his conduct as
aforesaid— Defendant prays, that the above
be taken Not only as answer to Plaintiffs petition
but also be considered as a Cross Bill against
the said Plaintiff, and that She be divorced
from the bonds of Matrimony subsisting bet-
-ween Defendant and Plaintiff— Defendant States
that She is entirely without pecuniary means being
entirely dependent upon her father David Wilson

She now states — That the said plaintiff is in such pecuniary circumstances, being possessed of a large amount of property and money worth of the amt of ~~Dollars~~ thousand dollars — Defendant prays, that an order be made, at the time of decree, said divorce as prayed for by Defendant — allowing her such alimony and Maintenance as the circumstances of the parties and nature of the case should be considered reasonable — And Defendant also ~~states~~, that being without means as aforesaid, that this Court Make an order allowing her a sufficient sum of money, for the purpose of prosecuting her said Complaint as well as to defend the Complt of Plaintiff and for her present Maintenance and support until the Conclusion of this Cause — And Defendant also prays for such other and further Relief as may be deemed legal and equitable

Rebecca Ferland
By Wilson & Clark her atty.

Rebecca A Ferland the above Defendant Says on oath, that the facts stated in the foregoing answer are true according to the best knowledge of Defendant and that said Complaint is not Made out of haste — or by Collusion between Plaintiff and Defendant

for the Reason purpose of being Desperately
prone to shoot Persons in Society and Under
for the Causes Mentioned in the above Affidavit

Rebecca Freeland

Sworn and Subscribed before me
the undersigned Justice of the County
Court of Platte County, Missouri on
this 14th day of September 1854

P. H. Clark
Justice County Court
Platte County Mo

John Maclanahan
Ann Gibson
Rebecca Freeland

Caroline Grayson

Filed Sept 14th 1854
W. C. Mumy Clk

John Freeland

vs

Rebecca Freeland

Plaintiff moves the Court
for to strike out the following
part of defendants answer
and cross petition Court
Sustaining at the word defend-
ant in the 4th line of the 2d page
and ending with the word intole-
able in the 11th line of the same page

Because the same is redun-
dant irrelevant, and immaterial
and is surplusage

Ellis Morris & Leonard

Eldridge Hartsell

X

John Freeland

vs

Divorce

Rebecca Freeland

Motion to dismiss

Costs of defendants

Cross Petition

Filed Sept. 15. 1854

W. M. Rennington

Clk

John N Ireland
vs
Rebecca Ireland

In the ~~Platte~~ Circuit Court for Platte County Missouri A.D. 1852 to September Term

Plaintiff
Defendant.

Plaintiff states that about the month of September A.D. 1845 he intermarried in Platte County Missouri with defendant — that plaintiff has resided in Platte County ever since — that plaintiff and defendant lived together as husband and wife until about the month of October 1850 when defendant wilfully deserted and absented herself from plaintiff without any reasonable cause and from thence hitherto she has wilfully absented herself from plaintiff without any reasonable cause which was a period of more than two years next before the Commencement of this Suit.

Plaintiff states that defendant's father resides in Platte County — that when she deserted plaintiff she did not make her residence at her fathers but a short time — that for a while she stayed at Weston — that afterwards she left the County — that plaintiff is informed and believes that she has turned out to be a most abandoned character, to live a life of prostitution: plaintiff charges that she has

been guilty of adultery since the marriage aforesaid and before the commencement of this suit, at various times and with various individuals to Plaintiff unknown

Plaintiff further states that at various times and places and upon sundry occasions the defendant has offered such indignities to him as to render his condition intolerable, to wit, that she has upon various occasions aforesaid threatened to poison him, the said plaintiff and intimated that there were other ways of being free from him besides obtaining a divorce & also that she had proposed to other individuals of whom to Elope from the said plaintiff and live a life of open and notorious adultery; also that she the said defendant had threatened to destroy their mutual offspring and afterwards that she admitted to various individuals and plaintiff believes that she did so destroy them that she had done so by reason of all which plaintiff verily believed and still believes that was and was in great danger both of his life and happiness if he should have continued longer to live with defendant or if he were to resume his position with her as her husband

Plaintiff and defendant had no children Plaintiff always conducted himself towards

defendant as a prudent husband and never gave her any cause for her conduct aforesaids.

Plaintiff prays to be divorced from the bonds of matrimony subsisting between plaintiff and defendant, and for such other relief as shall be just and Equitable.

Wilkinson, Rice, Leonard and Barnes
Attys for Plaintiff

John W. Freeland says on oath that the facts stated in the foregoing petition are true according to the best knowledge and belief of Petitioner and that Complaint is not made out of levity or by collusion with 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.

John W Freeland

Sworn to & subscribed before me this 16th Sept A.D. 1834

W. C. Remington Clk
By C. Ogle D. C.

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John W. Freeland
vs
Divorce
Rebecca Freeland

Plaintiff's amended
petition.

Filed Sept. 16 1854
W. Reynolds Clk.

Henry Ireland
vs
Elizabeth
Rebecca Ireland

And the said Respondent
moves the Court to Make an order on the
said Complaint directing him to pay to Respondent
such sum of Money as the Court may
Under the circumstances of the Parties deem
just and proper for the Maintenance in and
Support of Respondent during the progress
of the above Suit as well as a sufficient
Sum of Money to pay all necessary expenses
of Defending said Cause as well as prosecuting
her Cross Bill heretofore filed in this
Cause — The Cause for Making the above
Motion is, that Respondent is entirely without
Complainant's
Pecuniary Means, being entirely dependent upon her for support

Nelson Clark
Sol for Resp

John Lovland
vs
Rebecca Lovland

Motion for Permt
Maintenance

Filed Sept 16, 1834
W C Remington Clk
By E O Sayles

John W. Freeland Plff

vs

Petition for Divorce.

Rebecca Freeland Deft.

To the Hon. the Circuit Court of Platte County.

Your Petitioner Rebecca Freeland defendant in the above cause respectfully states that the Judge of said Court also the Judge of the Court of Common Pleas are prejudiced against your petitioner wherefore she prays a change of venue of the above cause to some other Circuit

Rebecca Freeland

By Wilson & Adams

This affiant Rebecca Freeland upon oath says that the facts set forth in the above petition she believes to be true, and that she has just cause to believe she cannot have a fair trial on account of the cause alledged.

Rebecca Freeland

Subscribed and sworn to before me the undersigned Notice of the Platte Co. Court of Platte County Missouri on this 8th day of March 1883

Wm W Adams

Justice Circuit Court Platte Co Mo

Jno. W. Freeland

vs { Petition Charge
of Treason

Rebecca Freeland

Filed March 10/55

W. C. Cummings
Clerk

John W Ford and
M E Divorce -
Rebecca Ford

24 Sept.

Now at this day came on this Case for hearing on the Petition and Proof - And it appearing to the Satisfaction of the Court that about the 20th of October Eighteen hundred and fifty the Defendant left the house and bed of Plaintiff without any Cause whatever - And that said Defendant has been and remained absent from that time to the present being more than Two years before the Commencement of this Suit, And it further appearing to the Satisfaction of the Court that the Plaintiff is the innocent and injured party, and that his treatment of Defendant was kind and of a proper character, ~~and that~~

It is therefore Considered by the Court that the Plaintiff be Divorced from the bonds of Matrimony by him Contracted with Defendant and that he be Released and go free therefrom, and that the Plaintiff pay the Costs of this Suit, and that Execution issue therefor

E. H. Norton
Judge

John W Freeland

B. Reeve

Rebecca Freeland