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The State of Indiana
Adams County ss

J. Mary Ross
being duly sworn, depose and say
that all the several matters and things
which are set forth in the foregoing
answers, as from the information of
others, I believe to be true, and that
all the several other matters and
things therein set forth are true in
substance and in fact.

Mary ^{her} Ross x
J. mark.

Sworn to and subscribed before
me this 8th day of February
AD 1849

Essie's Dailes Seal
Justice of the Peace

State of Indiana³

Adams County ²/₂₄

In the Adams Circuit Court

March Term A.D. 1849

To the Honorable the Judges of the Adams

Circuit Court in Chancery, setting Your Orator Joseph Cross resident of said County against the said Mary Tindal that sometime in the Month of July in the year A.D. 1848, he became acquainted with one Mary Tindal who was then then Resident in Parment County State of Ohio but who was temporarily across the state line in Indiana Your Orator having arrived at the period of life when the influence of love takes the easiest hold he was induced by the Artifice & design of the said Mary to commence a Courtship, which resulted in their union by Marriage on or about the tenth of September of the same year at the County of Adams in the State of Indiana. Your Orator sheweth unto Your honors that on or about the first of December in the year Aforesaid the said Mary was delivered of a full grown female Child, being from the Marriage to the Birth of said Child a period of less than three Months Your Orator solemnly swears that he never had sexual intercourse with the said Mary previous to the commencement of the Conjugal state and that he is not the father of said Child but that said Child was begotten not only before the time of the Marriage Aforesaid but before the time that Your Orator first became acquainted with the said Mary Your Orator Charges that he was basely deceived taken in and drawn on by the said Mary Tindal that when he Married her he supposed her not only not pregnant but Above Suspicion as to her Virtue that during their brief Courtship she assumed every Mark of Modesty and Virtue and that her Artifice was so great and so cleverly planned and Executed by Mechanical process as to actually exclude a knowledge of her pregnancy by the usual visible signs accompanying such advanced stages and she continued to deceive Your Orator and deny her Condition till the labours of Childbirth approached Your Orator further Charges that after the Birth of said Child the said Mary frankly Acknowledged that Your Orator was not its father but that it had been begotten before her knowledge of Your Orator Your Orator most positively swears that at the time of his intermarriage with the said Mary he had not the remotest knowledge or suspicion of her pregnancy but that he acted in the utmost good faith in such Marriage Your Orator sheweth that he is young and in Experience but barely attained to his majority and has but little knowledge of Mankind in general and woman in particular he regards himself as being placed in an Awful dilemma and implores Asks for the Merciful interposition of the Court to assist his Misfortune

He Avows that he is now and has been regularly a Resident of
said County of Adams & State of Indiana for a period of more
than two years last past He therefore asks the process of
the Court that said Mary Ross may be Compelled to answer
under Oath all and singular the premises set forth in this
Bill And that upon a final hearing of the same the
Vowes of Matrimony may be dissolved and
declared null and void And that her Coverture may
have such other Attendants for the relief As Equity and
good Conscience may require &c.

Joseph Ross
By J. B. Simaker
his Attorney

Adams Circuit Court

Joseph Ross

^{vs}
Mary Ross

Bill for Divorc



STATE OF INDIANA, ADAMS COUNTY, ss.

The State of Indiana, to the Sheriff of Adams County, greeting.

You are hereby commanded to summon *John Thatcher & Sarah*
Cresser of Alston Mills,

to personally be and appear before the Judges of the Adams Circuit Court, ~~on the~~ *instant*
~~day of next term,~~ to be held at the Court House, in the town of Decatur, ~~on the~~
~~day of~~ *next*, to testify on behalf of the *Plaintiff* in a certain
cause there pending between *Joseph Rugg*
plaintiff and *Mary Rugg* defendant
and have you then and there this writ. In this *they* may not fail at *their* peril.

WITNESS SAMUEL L. RUGG, Clerk of said County this *6th* day of *March* 184*9*

Samuel L. Rugg
Clerk.

STATE OF INDIANA, ADAMS COUNTY, ss.

The State of Indiana, to the Sheriff of Adams County, greeting.

YOU are hereby commanded to summon *Mrs Nancy Ann Deen*

to personally be and appear before the Judges of the Adams Circuit Court, on the *first*
day of next Term, to be holden at the Court House, in the town of Decatur, on the *fifth*
day of *March instant* ~~next~~, to testify on behalf of the *Plaintiff* in a certain
cause therein pending between *Joseph H Ross*
plaintiff and *Mary Ross* defendant
and have you then and there this writ. In this *she* may not fail at *her* peril.

WITNESS—SAMUEL L. RUGG, Clerk of said County, this *1st* day of *March* 1848

Samuel L Rugg
Clerk.

State of Indiana

Joseph Ross }
vs }
Mary Ross } In the Adams Circuit Court
Bill in Chancery

State of Indiana Adams County

Be it Remembered that on this 3rd day of January

A.D. 1849 personally came before the undersigned

a Justice of the peace in and for said County

John Avery and being duly sworn deposes

and says that the above named defendant in

the above entitled cause is not a resident of

the State of Indiana as he is informed and

verily believes

Given under my hand and seal the 3rd day of
January 1849

John ^{his} Avery X
mark

William Messer Seal
Justice of the Peace

Joseph Ross }
vs } Bill for Divorce
Mary Ross }

The Clerk of the Adams Circuit Court
will please issue a Subpoena for
Andrew McCampbell, Sarah
White, John Tarrant, Eliza Ross
to testify on behalf of the Plaintiff
Jan 1st 1849
James Buchanan
Attorney for Plaintiff

Subpoena for witnesses issued
Jan 1st 1849
L. Rugg

STATE OF INDIANA, ADAMS COUNTY, ss.

The State of Indiana, to the Sheriff of Adams County, greeting,

YOU are hereby commanded to summon

Andrew Mc Campbell

Ross

to personally be and appear before the Judges of the Adams Circuit Court, on the *first*
day of next Term, to be holden at the Court House, in the town of Decatur, on the *6th*
day of *March* next, to testify on behalf of the *Complainant* in a certain
cause therein pending between *Joseph Ross Complainant*
~~plaintiff~~ and *Nancy Ross* defendant
and have you then and there this writ. In this *they* may not fail at *their* peril.

WITNESS—SAMUEL L. RUGG, Clerk of said County this *19th* day of *January* 184*9*

Samuel L Rugg
Clerk.