

To the Hon. A. S. Howlton, Chancellor,  
&c. presiding in the Chancery Court  
at Huntington Tenn. for Cassel County,

The Bill of Complainant of  
Nancy C. Abbott, a resident of  
Cassel County Tenn. Complainant,  
Against,

R. H. Abbott, a citizen of Cassel  
County Tenn. Defendant.

Complainant would respectfully  
represent unto your Hon. that upon  
the 14<sup>th</sup> day of Oct. 1886 in  
Benton County Tenn. she and the  
defendant R. H. Abbott were married.  
She states that soon after this said  
marriage they moved to Cassel  
County Tenn. where they lived  
together as man and wife until  
the day of Feb. 1887.

Complainant states unto  
your Hon. that during this said  
co-habitation that the defendant  
was set towards her frequently  
and her vile names, cursing  
her, abusing her, and threatening  
to whip her, she states he would  
seemingly get mad at her  
and not speak to her for days

Several days at a time and when he would speak it would be in an abusive cursing manner. Calling her a damn bitch, and totally failed to treat her, as a husband should and ought to treat a wife.

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She would further represent unto your Hon. that he failed to provide a comfortable home and provisions, and clothes for her, and she charges that owing to his failure to provide for her, that she suffered from cold and hunger, and that she frequently had to call upon her father and mother who lived some distance from her home for clothes and provisions to keep from freezing and starving.

She states that during the summer of 1896, she was confined to her room and bed by child birth, and she states that during this

confined to her loom and  
bed by child birth, and  
she states that during this

this time the defendant willfully  
neglected her, and that if it had  
not been for kind friends and  
the attention given her by  
her father and mother she would  
have died. As the defendant  
did not in any way provide  
for her during the time,

Complainant states unto  
your Hon. that the defendant  
was during the time of their  
living together giving all  
of his love and affection to  
Jane L. E. Pinkston, who lived  
near your complainant's home,  
and she charges that in ad-  
dition to all the foregoing  
matters the defendant committed  
adultery with the said L. E.  
Pinkston in the 18th Civil  
District of Carroll County Tenn.,  
at the house of the said  
L. E. Pinkston upon the  
day of Jan. 1857.

Complainant states unto  
your Hon. that she was kind  
towards her husband, that she  
endured many of the hard-

Complains Charges that if he had not committed adultery with the said L. E. Pinsterton that his wife - without having been induced by conditions imputed and that they would have been impelled to have withdrawn from him.

Ships

as wants of the money he did her, thinking and believing that he would reform, but that he grew more and more as the time, she charges that she was true to her marriage vows, and has lived closely all the time, and that she has given the defendant no great cause for his said misconduct towards her, and that as soon as she was informed that he had committed adultery with the said L. E. Pinsterton she at once left him, and that she has not lived with him since, and has in no way condoned his actions,

These premises considered Complainant prays that she be named as defendant for the caption be made such that process issue or require by law, that the defendant be required to answer this bill, but that

oath to his answer is expressly  
waived, and that upon a final  
hearing of this cause you  
shall decree that the bonds of  
matrimony uniting your Com-  
plainant and the defendant  
be dissolved, and for nothing  
held, and that she be absolutely  
divorced from him,

and that she have all  
such other and further  
benefit and relief as she may be en-  
-titled to. As duty bound  
will ever pray,

J. J. Peckhol,  
for Complainant

State of Texas. } This day personally ap-  
Comal County } peared before me P. D.  
Bueler Jr. an acting J. P. for Comal  
County Texas. Nancy C. Abbott  
who being duly sworn, makes oath  
that the facts stated in her foregoing  
bill are true to the best of her  
knowledge and belief, as made

8.

upon her own knowledge, and  
then made upon informa-  
-tion she believes to be true,  
and that the complainant is  
not made out of levity or  
by collusion with the defend-  
-ent but in sincerity and  
truth for the cause mention-  
ed in the bill.

Sworn and subscribed } + N. S. Abbott  
to before me this the }  
26<sup>th</sup> day of July 1847 }  
P. J. Butler Jr J. P.

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State of Texas }  
Cassale County } . J. Nancy C. Abbott  
do solemnly swear, that owing  
to my poverty I am unable  
to bear the expenses of a  
suit I have this day instituted  
in the Chancery Court at  
Huntingdon Texas, against  
R. H. Abbott, for a divorce,  
and that I am justly entitled  
to the relief sought, to the best  
of my knowledge and belief

Sworn and subscribed } + N. S. Abbott  
to before me this the }  
26<sup>th</sup> day of July 1847 }  
P. J. Butler Jr J. P.

Nancy C

7  
R 1913

Nancy C. Abbott

D. Bell

R. H. Abbott

Filed July 27, 1913  
Wm. B. Mason  
C. M.

Nancy C. Abbott vs. R. H. Abbott

STATE OF TENNESSEE.

To the Sheriff or any Constable of Cornwall County—GREETING:

You are Hereby Commanded to Summon P. H. Melton,  
W. H. Smother + P. T. Butler

personally to appear before the Clerk and Master of the Chancery Court, at his office in Huntingdon on the 6<sup>th</sup> day of Aug., 1897, to testify and the truth to speak in the behalf of the Compt. in a certain matter of controversy in Chancery Court wherein Nancy C. Abbott Complainant, and B. H. Abbott Defendant and this You shall in nowise omit under the penalty of One Hundred and Twenty-five Dollars. Herein fail not, and have you then and there this Writ.

Witness: W. M. Carson, Clerk and Master of our said Chancery Court, at office, this the

1<sup>st</sup> Monday in Aug. 1897  
W. M. Carson C. & M.

No. \_\_\_\_\_

SUBPENA FOR WITNESS,

Nancy C. Abbott

vs.

R. H. Abbott.

Issued 1 and day of

Aug 1897.

at Worcester

Sherrill County Democrat Job Print.

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Came to hand  
August 4, 1897

W. P. Birdwell  
D. C. C.

This August  
5th 1897

Executed as  
demanded

Fee 75 cts

W. P. Birdwell  
D. C. C.

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SUBPENA TO ANSWER.

No. 1913

IN CHANCERY.

Nancy C. Abbett

R. H. Abbett

Issued 27<sup>th</sup> day of July 1897

Wm. C. M.  
C. & M.

J. J. Ouler,  
Solicitor for Complainant.

CARROLL COUNTY REMOVED JOB PRINT.

Executed within 24 hrs. by summoning  
within Dept. as herein demanded &  
returning to him copy of Bill  
filed. This copy 27<sup>th</sup> July 1897  
W. J. Chambers. Chf.

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Nancy C. Abbett vs. R. H. Abbett

SUBPOENA TO ANSWER.

STATE OF TENNESSEE. CARROLL COUNTY.

TO THE SHERIFF OF Carroll COUNTY-GREETING:

We command you to summon R W Abbott

to appear before the Clerk and Master of the Chancery Court of the Ninth Chancery Division, at Huntingdon, on the First Monday, the 2<sup>nd</sup> day of Aug, 1897 (it being rule day.) then and there to answer the Original Bill of Complaint of

Nancy C Abbott

(a copy of which accompanies this writ.) and further do and receive what our said Court shall consider in that behalf; and this you shall in no wise omit, under the penalty prescribed by law. Herein fail not, and have you then and there this writ.

Witness, W. M. Carson, Clerk and Master of our said Chancery Court, at Office, in the Court House at Huntingdon, this First Monday in July 1897 and the 12<sup>th</sup> year of American Independence.

W M Carson Clerk and Master.

By \_\_\_\_\_ D. C. and M.

Nancy C. Abbott vs R. W. Abbott

Abbott } Nancy, Co

do  
Abbott } R.H.

Witness for Corrupt.

Corrupt - Sworn.

W H Danaher not sworn.

P H Mason -

Buller not sworn

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Nancy C. Abbott vs F. J. ...

Nancy C. Abbott

do {  
Minnie  
Eleanor

R. M. Abbott

x

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Nancy C. Abbott vs R. M. Abbott

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Nancy C. Abbott

R. H. Abbott

Be it remem-

bered that this  
 Court came on to be  
 and was held before the  
 Hon. A. G. Hawkins presiding  
 in the Chancery Court at  
 Huntington New York, upon  
 this the 7th day of May, 1891,  
 upon the record and oral  
 proof introduced in  
 open Court, and it appear-  
 ing to the Court, that the  
 defendant had not provided  
 for complainant as he should  
 and should have done, and  
 that he had been cruel to  
 her, and that all the grounds  
 set out in complainant's bill  
 except the charge of adultery.  
 are true, it is therefore  
 adjudged, ordered and decreed  
 that the bonds of matrimony  
 subsisting between complainant  
 and defendant, are dissolved  
 and for nothing held, and  
 that complainant be and is  
 absolutely discharged from

Defendant, and that  
Defendant pay the cost  
of this suit for which  
exceptions may issue,

1913

Nancy C. Abbett

vs

no

R. H. Abbett

Ensign Book "S"

Page 179.

Aug. Term 1897

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STATE OF TENNESSEE.

TO THE SHERIFF OF Carroll COUNTY-GREETING:

We command you, that of the goods and chattels, lands and tenements of R. H. Abbett

into in your County, you cause to be made the sum of (y 18 45) Fifteen and 45/100 Dollars, with interest thereon from August 1880 and the costs indorsed upon this writ, which Nancy C. Abbett

lately in our Court of Chancery at Huntingdon recovered against him whereof he is convicted, as appears to us of record; and that you have the same before the Chancellor of our said Court at the next term thereof, to be holden at the Courthouse in Huntingdon on the 1<sup>st</sup> Monday in July next, to render to the said Nancy C. Abbett and have then and there this writ.

Witness W. M. Lawson, Clerk and Master of our said Chancery Court, at office at Huntingdon the 1<sup>st</sup> Monday in August in the year of our Lord, 1887, and of American Independence the 122<sup>nd</sup> year.

W. M. Lawson, Clerk and Master.

By \_\_\_\_\_, Deputy Clerk and Master.

BILL OF COSTS.

State Tax <sup>2.50</sup>	County Tax <sup>2.50</sup>			
67 M - Cannon Side Bill <sup>25</sup>	Copy Bill <sup>10</sup>	Ins. App. to Dec. <sup>75</sup>		
2 x 1. Gas bks for 3 with <sup>20</sup>	order <sup>20</sup>	Prose papers <sup>20</sup>		
2 x 1. Order for <sup>20</sup>	order <sup>20</sup>	order <sup>20</sup>		
2 x 1. Bill cont. <sup>20</sup>	copy <sup>20</sup>	File <sup>40</sup>		5 20
Ch. Auditor 2 <sup>10</sup>	copy <sup>10</sup>	no copy not examined <sup>10</sup>		1 50
Dr. Lohmeyer by <sup>10</sup>	App. to Dec. <sup>10</sup>	P. H. Nelson 1 <sup>10</sup>		2
H. P. Beardsall <sup>10</sup>	Summons with <sup>10</sup>	H. H. Donahoe 1 <sup>10</sup>		1 25
				15 45

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Nancy C. Abbett vs. R. H. Abbett

Search made & no property found  
in my County upon which to satisfy  
this Fi. Fa.

This July. 5<sup>th</sup> 1898.

E. J. Chambers  
Sheriff

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IN CHANCERY AT

Nancy C. Abbett  
vs.  
R. H. Abbett

R. H. Abbett

FIERI FACIAS.

Issued Nov. 16 1897

W. H. Chamberlain  
Clerk and Receiver

Search done \$10.75  
Ferry  
Gross.

Printed & Bound by C. W. Burdette, Nashville, Tenn.

BILL OF COSTS—Continued.

Amount brought over

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Nancy C. Abbett vs. R. H. Abbett