

No 532
in
Superior Court

Urean L. Peel
Plaintiff
vs
John Peel
Defendant

Action for Divorce
Rec^d and Filed

Dec 11th 1871
D.W. Caswell
Clerk

J.A. Haylor
Attorney for Plaintiff

Copy

In the Superior Court of the State of Washington for the County of Grant.
Urean L. Peel
vs
John Peel
Plaintiff
vs
Defendant
FILED BY THE CLERK OF THE COURT FOR THE COUNTY OF GRANT, WASHINGTON, THIS 11th DAY OF DECEMBER, 1871.
D.W. Caswell
Clerk

In the Superior Court of Lewis County
State of Washington holding term at
Lehalie

Urean L. Peel
Plaintiff
vs
John Peel
Defendant
Complaint

To the Hon. U.S. District Judge of the
above named Court
The Plaintiff complains and
alleges,

1st
That the Plaintiff and Defendant
intermarried at Brimfield in England
on or about the 7th day of March, 1874
and ever since have been Husband
and Wife

2^d
That the Plaintiff is now and has
been a resident of Lewis County, State
of Washington for a period of more
than one year immediately preceding
the commencement of this action

3^d
That since said marriage the Defendant
has treated his Plaintiff in a cruel
and inhuman manner and in
particular as follows, to wit, that at
Lewis County in the State of Washington
about October 1st 1874 the Defendant

at the then Home of the Plaintiff and Defendant and disregarding the feelings of this Plaintiff upset the dinner table and then and there breaking all the dishes there and in the same angry manner threw the chairs about the room violently swearing and using violent profane epithets towards this Plaintiff and children compelling them to abandon the House for safety of their lives. The Defendant then and there in the same angry and more vicious manner running violently out of the House jumped into a mill race vowing that he would then and there kill himself all of which acts on the part of the said Defendant did greatly alarm and terrify this Plaintiff and his family so much so that this Plaintiff was confined to her bed and room for many days there after having only a few weeks previous thereto given birth to a child

14th

And Plaintiff further alleges that at Lewis County aforesaid on or about the 14 day of September 1889 that this Plaintiff was confined to her bed and room by reason of having to the youngest child Rda the Defendant in an angry and vicious and threatening manner struck beat

and wounded the children of plaintiff and defendant without any cause whatsoever and broke all the dishes on the table and threw the broken remains out of doors, then and there calling the children aforesaid "sons of bitches" and other vile names too vile to be spread upon the records of this Court thereby greatly frightening this Plaintiff and her said children

And Plaintiff further alleges that at said Lewis County on or about the 7th day of September 1889 the defendant with an uplifted axe in his hand threatened to brain John R. Peel the oldest son of the issue of said marriage which so terrified the said son which caused him to run into the House to this Plaintiff for protection against the violence and rage of said Defendant and Plaintiff further alleges

That at Lewis County Washington on or about the 25th day of December 1890 the defendant without cause or provocation and in an angry and violent manner struck this Plaintiff in the face with his fist breaking her nose against the wall at the same time calling this Plaintiff a "damned old bitch" and other vile names and epithets too vile to be spread upon the records of this Court thereby causing plaintiff great

pain and suffering and that all the above mentioned acts of cruelty as well as others and many other acts of a similar character have caused this Plaintiff great bodily suffering and mental pain and anguish rendering her life broken some

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Plaintiff further alleges that she is the sole owner and possessor in her own right of the following described tracts of land situated in said Lewis County as follows, to wit:
Lots numbered 21, 22, 23, 24 in Block numbered 13 Northern Pacific Addition and more or less 35 acres of land lying in Sec 7 in Township 14 North Range 2 West of the Tulara of \$2550⁰⁰ dollars and that all of said property was acquired by this Plaintiff with money given to her by her father for her own use and benefit

6
Plaintiff further alleges that there are now living of the issue of their said marriage six children viz Sadie B. aged 15 years John B. aged 12 years Mary aged 10 Kenneth aged 7 years Annie aged 5 years Eda aged 2 years
Wherefore Plaintiff demands judgment
1st that the Bonds of matrimony between herself and the Defendant be dissolved

and that the custody of said minor children be awarded to this Plaintiff and for such other and further relief as to this Court may seem just and proper in the premises

James H. Bayler
Attorney for the Plaintiff

State of Washington }
County of Lewis }

Wm. L. Paul being first duly sworn or oath depose and say that she is the Plaintiff in the foregoing entitled action that she has heard and the foregoing Complaint know the contents thereof that the same is true as she verily believes

Witness my hand and seal
at Oakeside Washington
James H. Bayler
Notary Public Residing
at Oakeside Washington

State of Washington }
County of Lewis }

I James H. Bayler Attorney for the Plaintiff in the above entitled action do hereby certify that the above and foregoing is a true and correct copy of the original Complaint in said action as filed with the Clerk of the Superior Court of Lewis County Washington December 11th 1891. James H. Bayler
Attorney for the Plaintiff