

In Circuit Court of
Saint Louis County, Missouri, Term 1848

State of Missouri
County of Saint Louis

Peggy Poryman
a free woman of color complains of
Joseph Philibert of a plea of trespass
for false imprisonment for that whereas heretofore
to wit at the city and county of Saint
Louis and state of Missouri ~~and~~ or about
the ~~fall~~ ^{spring} of the year one thousand eight hundred
and forty seven as well as your petitioner
recollects the said Joseph Philibert defendant
then and there with force and arms
assaulted the said Peggy and her
said Peggy then and there took and
imprisoned and restrained her of her liberty
and he the said Peggy held in servitude from
the ~~fall~~ ^{spring} of the year 1847 at which time as your
petitioner is informed the said defendant
purchased her from one ^{Bartholomew} until the present time
and still holds her in servitude without any
reasonable or probable cause against the
law of the land and against the will
of her the said Peggy and she the

do hereby pray and beseech that she
Peggy be set free and at the time of the
of said grievance was and still
is and that the said defendant
holds her in servitude and slavery
and to the great damage of
and therefore she does

Shew
atty people

No 2
St. Louis Circuit
April Term 1848

Copy (of color)

vs

Joseph Phillips

Indy for his inf

St. Louis Mo.

Filed June 1848
J. H. B. Clerk

Handwritten text on the top flap, partially obscured and upside down.

Executed this order of Court by reading it and the
Petition and declaration to Joseph Phillips in the
County of St. Louis April 8th 1848

Samuel Conway Sheriff
By D. H. Bishop Deputy

Service of \$ 50
Copy of 60
\$ 1.10

Large area of faint, mostly illegible handwriting at the bottom of the document.

To the Hon Alexander Hamilton
Judge of the St. Louis County Court

The Petition of Peggy Perryman respectfully
represents that on or about the first of ^{August} ~~July~~ last
^{August 1st} ~~July 1st~~ 1846
path she was residing with her friends in Arkansas
in the peaceable enjoyment of her freedom and
civil rights to which she was entitled by birth
her parents being free persons her father a free
person of color in said state and her mother
who was lawfully married to her father an Indian
of the Black foot Tribe Your Petitioner represents
that about that time she was suddenly seized
by persons to her life and unknown gazed and
transported and finally sold into servitude
that her relatives by the mother side are all not
only free since the memory of man but are
distinguished among their tribe Your
Petitioner represents as such free born
person she is entitled to her freedom and
the enjoyment of which she is now restrained
wherefore she prays in consideration of
the premises she may have leave to sue
as a poor person in order to establish
her right to freedom and that counsel
and assistance may be had to her for that purpose
and order be made as to secure
release of prosecuting her said
as in duty bound she

Peggy X Perryman
her
mark

1848.

Howard

by the Court in the middle
at the ~~Defendant's~~ ~~cost~~
~~State of Virginia with sufficient~~
~~to that the~~ petitioner shall during
said have reasonable liberty of all
recusal and the court that she
removed out of the state or jurisdiction
that she shall not be subject

to any liability on account of her Application
for her freedom ~~and~~ ~~of~~ ~~said~~
~~Defendant~~ or his agent entering into the
above recognizance. That the Sheriff take possession
of the petitioner and his her out to the ~~benefit~~
~~advantage~~ from time to time during the term of
this writ taking bond from the him in the penalty
of ~~One~~ that she be permitted to
live as a poor person.

A. Hamilton
Inf. Sr.

Peggy (off color)
Joseph Millbert

In the Circuit Court
of Saint Louis County
April Term 1848

And now this day comes the said
defendant of his attorney, and moves the
Court to dismiss the above ^{petition} suit for the
following reasons

1st Because no security has ^{been} ~~been~~ ^{given} ~~given~~
by the petitioner ^{to} ~~to ^{secure} ~~secure~~
before the commencement of the suit
the costs that might be
adjudged against her the petitioner, as
is required of the Statute~~

2^d Because no sufficient outlay is given
the Court of Statute to permit such
suit of one held as a slave, as a poor
person

3^d Because no sufficient reason or cause
is shown for such order nor it were
lawful to make it

4th Because there is in fact no suit
pending for want of sufficient
joinder

5th Because there is no writ.

6th Because there is no service.

J. H. Hall
Att. for Def.

Copy (of color)

29
Joseph McWhip

Notes to Thomas
Reasons

Freda Hall

H. G. Smith

Done June 15. 1865
Jas. Perkins ad

To the Honble Alexander Hamilton
Judge of the St Louis county
Circuit Court.

The Petitioner of Peggy Perryman
respectfully represents that on or about the
first day of December 1848 She was visit-
-ing with her friends in Arkansas in the
enjoyment of her freedom and civil rights
to which she was entitled her parents being a
free persons her father a free person of
color in said state and her mother who
was lawfully married to her father an
Indian of the Black foot tribe - Your
Petitioner represents that about that time
She was suddenly seized by persons to
her before unknown gagged and transported
and finally sold into servitude - that
her relatives by the mother side and all not only
free lived the summing of man but and dis-
-tinguished among the tribe - Your
Petitioner represents as such free person she
is entitled to her freedom from the enjoyment of
which she is now restrained ^{by high Sheriff} - Therefore she
prays in consideration of the promises she
may have had to and as a poor person
in order to establish her right to freedom
and that counsel may be assigned to her for
that purpose and that such order be made
as to secure her in the privilege of prosecuting
her said claims and as in duty bound she
will ever pray

Peggy X Perryman
mark

Witness my hand
J. M. Shum.

Given to subscribers before me to get true
his 5th day of July, 1848.

J. Howard Clk Criminal Court

Copy of order
Philadelphia ~~Pa~~

Circuit Court of
St. Louis County
November Term
1848

The ~~said~~ defendant
serves and defends the decree
of the ^{20th} Plaintiff Doby. Field & Holt
Attys for Deft

My dear

29

Philadelphia

Voluntary

Dear

My dear

e

Nov. 20. 1848
for. Boston 5 ab

107. 576

In Circuit Court of
St. Louis County Nov. 1. 1848
State of Missouri
County of St. Louis

Peggy Perryman a
free woman of color complainant of Joseph
Phillips of a plea of Trespass for false
imprisonment for that she was lawfully imprisoned
at the City and County of St. Louis and
State of Mo during the Spring of 1847
as well as your petitioner recollects
the said Joseph Phillips Defendant
then and there with force and arms
abducted the said Peggy and then and
there took and imprisoned and
restrained her of her liberty and her the
said Peggy held in servitude from
the Spring of the year 1847 at which
time as your petitioner is informed
the said Def. her from one Bartlett
until the present time and still holds
her in such servitude without any
reasonable or probable cause against
the law of the land and against the will
of the said Peggy and she the said Peggy
further avers and declares that she before
and at the time of the committing of the
said grievances was and still is a free woman
and that the said Def. held and still
holds her in servitude and slavery against
the peace of and to the great damage of
the said Peggy and therefore she desires
Peggy Perryman
By John
her atty.

It is ordered by the court in the
within case that the petitioner
shall, during the pendency of this
suit have reasonable liberty of attending
her counsel and the court and that
she shall not be removed out of
the state or jurisdiction of this court
and shall not be subject to any
seizure on account of her application
for freedom and that she be
permitted to sue as a poor person

Personally appeared I M Shum and
being sworn depose that Peggy Perryman
is a poor person and unable to
prosecute her suits but as a poor person

sworn to & subscribed I M Shum
Dec 1848

Geo Kulanck

3
COUNTY OF ST. LOUIS, SS.

THE STATE OF MISSOURI,

To the Sheriff of St. Louis County, GREETING:

WE command you

To summon Joseph
Philibert if he be found in
your County, that he be and
appear

before the Judge of our Circuit Court, on the first day of the next term thereof, to be
held at the City of St. Louis, within and for the County of St. Louis, on the third Mon-
day of ~~April~~ next, then and there to answer unto

Deanna
Terryman (of color) after petition filed for
freedom. filed Dec 3rd 1848.

to the sheriff of said Philibert

And have you then there this writ.

WITNESS, JOHN RULAND, Clerk of our said Court,

with the seal thereof hereto affixed, at office, in the
city of St. Louis, this 18th day of
December in the year of our Lord eighteen
hundred and forty

John Ruland CLERK.

I acknowledge myself bound for all costs that may accrue in the above cause.

WITNESS my hand and seal, at St. Louis, this

day of

184





COUNTY OF ST. LOUIS MO

STATE OF MISSOURI

To the Clerk of the Court of the County of St. Louis

1848

[Faint, mostly illegible handwritten text, possibly a declaration or affidavit.]

[Faint, mostly illegible handwritten text, possibly a signature or date.]

Executed this writ in the County of St. Louis on the 19th day of December 1848 by reading it to Joseph Philibert and further executed the same on the same day by offering to read the declaration to the said Joseph Philibert which he refused to hear

Louis Habcaump Sheriff
By Leon Sherman deft

Service \$1.00



County of St. Louis, ss.

THE STATE OF MISSOURI,

To *John Walcott*

GREETING:

You are hereby commanded, that setting aside all manner of excuse and delay, you appear before our Circuit Court for the county aforesaid, on the *25th* *January* at the City of St. Louis, then and there to testify, and the truth to say in a certain matter of controversy now pending in our said Court, wherein *Peggy Perryman* plaintiff, and *Jos. Philibert* is defendant on the part of *Plaintiff* and herein you are in no wise to fail.

Witness, WILSON PRIMM, Clerk of our said Court, with the seal thereof hereto affixed, at office, in the City of St. Louis, this *25th* day of *January* in the year of our Lord one thousand eight hundred and forty-*7*

Wilson Primm Clerk, C. C.

Peggy Longman }
 } You to St Louis
 } Lieut leant
 } November 2nd
 } 1848

And now this day comes
the said defendant and moves
the court to dismiss the above
entitled suit for the following
reasons

First. Because the said plaintiff
has given no security for the
costs in said case as of law is
required

Second. Because said ~~case~~ service
is not returned according to
law

Doxy Seabolt Holt
Attys to Def^t

Agg. Longman

Phil. M. L. L.

Milton B. L. L.

St. Anthony 9th 1899
Wm. L. L.

Sezzy Perryman, in the Circuit Court
vs
Joseph Philibert } of St. Louis County
April Term 1849.

The said defendant comes and defends
the demand of plaintiff

Filed at Hall
Atts for Defn

By the Plaintiff
Joseph Philibert
Attorney

By the Defendant
Sezzy Perryman
Attorney

Filed at Hall
Atts for Defn

Peggy Longman
19

Joseph Philibert
Notutary Men.

J. W. Hall
Atty for Dep.

Dist April 17 1849
Miles Primm Clerk

99

Peggy Perryman } In the St. James
Joseph Phillibert } Circuit Court
April Term 1849

That it is remembered that on
the 4th day of February 1849 the
said defendant in the above entitled
cause filed his motion and
reasons (Here insert motion and reasons)
to dismiss the said cause, and on
the 4th day of October in the same
term in the year 1849 the said
motion came on to be heard
when the Court upon said
motion overruled said motion
to which objection of the Court
in annulling said motion the
said defendant then and
there at the time accepted
and now says that this his
bill of exceptions may be
signed sealed and make a
part of the record in the
said cause. The Defendant
having filed on the 20th day of Nov. 1848,
and also on the 17th day of April 1849,

his plea of the general issue
in said cause.

A. Hamilton,
Jr. C. J.

Wm. Langman

19
Joseph M. L. L. L.

Dr. H. of Exempt

Follow Oct. 6. 1849

Nov. 9. L. L. L. L.

County of St. Louis, SS.

THE STATE OF MISSOURI,

To *John Calvert Batish et al*

GREETING:

YOU ARE HEREBY COMMANDED, that setting aside all manner of excuse and delay, you appear before our Circuit Court for the County aforesaid, on the *18th*

February, at the City of St. Louis, then and there to testify, and the truth to say in a certain matter of controversy now pending in our said Court, wherein *Peggy Rossmann* is plaintiff and *Joseph Robinson* is defendant on the part of *et al* and herein you are in no wise to fail.

WITNESS, MICHAEL S. CERRE, Clerk of our said Court, with the seal thereof hereto affixed, at office, in the City of St. Louis, this *9th* day of *February* in the year of our Lord one thousand eight hundred and fifty —

M S Cerre Clerk, C. C.

St. Louis, Mo.
St. Louis, Mo.

Circuit Court
Nov 5 1849

Pigg's Row

Los Philiaut

Spa
+ In Calvert

Mon. Batsman

Et 7299288

There

Executed in Calvert
J. H. H. H. H. H.
Nov 5

THE STATE OF MISSOURI



County of St. Louis, ss.

THE STATE OF MISSOURI,

To *Antis Kennedy & Bradway Ell*
Reuben Bartlett & same place

GREETING:

You are hereby commanded, that setting aside all manner of excuse and delay, you appear before our Circuit Court for the County aforesaid, on the *18th day of February 1850* at the City of St. Louis, then and there to testify, and the truth to say in a certain matter of controversy now pending in our said Court, wherein *Peggy Penman is* plaintiff and *Phillip St. is* defendant on the part of *Def.*

and herein you are in no wise to fail.

M. D. Gore
Witness, *JOHN DELANEY*, Clerk of our said Court, with the seal thereof hereto affixed, at office, in the City of St. Louis, this *11th* day of *February* in the year of our Lord one thousand eight hundred and

~~18~~ *50*

M. D. Gore *clerk*
John Delaney Clerk C. C.

Peggy

Philibert

Was in Dept.
for the 1st

+ R. Bartlett

C. Kennedy

is cited on
Bartlett the other
not found

S. J. Lahaum St. H.

for 60

County of St. Louis, SS.

THE STATE OF MISSOURI,

To John Cabot, Man Pastors

GREETING:

YOU ARE HEREBY COMMANDED, that setting aside all manner of excuse and delay, you appear before our Circuit Court for the County aforesaid, on the 25th July 1850 at the City of St. Louis, then and there to testify, and the truth to say in a certain matter of controversy now pending in our said Court, wherein Gregory is plaintiff and John Cabot is defendant on the part of the defendant and herein you are in no wise to fail.

WITNESS, MICHAEL S. CERRE, Clerk of our Court, with the seal thereof hereto affixed, at office, in the City of St. Louis, this 13th day of July in the year of our Lord one thousand eight hundred and fifty

M. S. Cerre Clerk, C. C.

Peggy (of color)
 no
 Joe Phillips
 for pth
 Mrs. Calvus
 Mrs. Batiste

60
 10
 100
 60
 60
 50
 8.90
 1.20
 4.60

Executed on
 Calvus, Baptiste
 not found
 Louis Thibault
 shff
 Fee 60

~~Shiff~~
~~Paul~~
 Clerk
 Judge
 Shiff
 Madras
 Copy 75
 4 57
 50
 90
 50

Ent 72

County of St. Louis, SS.

THE STATE OF MISSOURI,

To *Curie Kennedy, Reuben Baffel*

GREETING:

YOU ARE HEREBY COMMANDED, that setting aside all manner of excuse and delay, you appear before our Circuit Court for the County aforesaid, on the *25th* *July* 1950. at the City of St. Louis, then and there to testify, and the truth to say in a certain matter of controversy now pending in our said Court, wherein *Perry of Collier* plaintiff and *Do. Philibert* defendant on the part of *Do. M* and herein you are in no wise to fail.

WITNESS, MICHAEL S. CERRE, Clerk of our said Court, with the seal thereof hereto affixed, at office, in the City of St. Louis, this *13* day of *July* in the year of our Lord one thousand eight hundred and fifty

Mo. S. Cerre Clerk, C. C.

County of St. Louis, SS.

THE STATE OF MISSOURI,

To Batisle Chouteau

CRETING:

YOU ARE HEREBY COMMANDED, that setting aside all manner of excuse and delay, you appear before our Circuit Court for the County aforesaid, on the *15th* *March* at the City of St. Louis, then and there to testify, and the truth to say in a certain matter of controversy now pending in our said Court, wherein *Peggy Perryman is* plaintiff and *Philibert is* defendant on the part of *Plaintiff* and herein you are in no wise to fail.

WITNESS, MICHAEL S. CERRE, Clerk of our Court, with the seal thereof hereto affixed, at office, in the City of St. Louis, this *13th* day of *March* in the year of our Lord one thousand eight hundred and fifty

M. S. Cerre Clerk, C. C.



