

In the District Court
April Term A.D. 1846

The Republic of Texas
County of Montgomery

To the Honorable the
District Court in and for the County
of Montgomery

The Petition of Joseph Lindley
and ~~son~~ his wife both of said County
humbly complains of Thomas J.
Wood of said County for that whereas
the said Thomas J. Wood heretofore on the
the first day of November in the year of
our Lord one thousand eight hundred
and thirty nine in a certain discourse
within the said Thomas J. Wood
then and there had of and concerning the
said ~~son~~ in the presence and
hearing of divers good and worthy
citizens of this Republic then and
there in the presence and hearing of the
said last mentioned citizens falsely
and maliciously spoke and published
of and concerning the said ~~son~~
these false scandalous malicious and
defamatory words following that is to say
"Joe Lindley wife ^(concerning the said son) is a damned
whore who has the clap and has
taken medicines ^{to} cause herself to
miscarry and by that means has had
one or two abortions"
And afterwards to wit on the day and
year aforesaid at the County of Montgomery
aforesaid in a certain other discourse which
he the said Thomas J. Wood then and
there had in the presence and hearing of

of others other good and worthy citizens of
this Republic he the said Thomas J. Wood
further contriving and intending as aforesaid
then and there in the presence and hearing of the
said last mentioned citizens falsely and
maliciously spoke and published of and concerning
the said Ann these other false scandalous
malicious and defamatory words following
that is to say, "Joe Lindley's wife is a
prostitute. She has taken medicines herself
and given medicines to her own daughter to
cause miscarriage and has caused it occur
twice thereby meaning that the said Ann
had unlawfully and maliciously administered
and caused to be administered to herself and
daughter poisons or other noxious things with
intent to procure the miscarriage of herself
the said Ann and of her said daughter.
By means of the committing of such said
several grievances by the said Thomas J.
Wood as aforesaid the the said Ann hath
been and is greatly injured in her good
name fame and credit and brought into
public scandal infamy and disgrace with
and amongst all her neighbors and other
good and worthy citizens of this Republic
inasmuch that divers of those neighbors and
citizens to whom the innocence and integrity of
the said Ann in the premises were unknown
have on occasion of the committing of the
said grievances by the said Wood as
aforesaid from thence hitherto suspected
and believed and still do suspect and
believe the said Ann to have been and
to be a person guilty of the said offenses
and misconduct before stated and imputed

to her charge and have by reason of the committing
of the said grievances by the said Wood as
aforesaid from them. Hitherto wholly refused
and still do refuse to have any further
transaction acquaintance or discourse with her
the said Ann as they were before used and
accustomed to have and otherwise would have
had. And the said Ann hath been and
is otherwise greatly injured by means of the
premises to wit at the County of
Montgomery aforesaid

Wherefore the said Joseph Lindley and
Ann his wife say that they are injured
to the damage of the said Joseph and Ann
his wife to the amount of ten thousand
dollars and therefore they bring their suit and
pray that the said Thomas J. Wood may
be cited to be and appear at the next term
of the District Court to be holden in and for
said County on the fourth Monday after the
fourth Monday in March of the present
year to answer this petition and that judg-
ment may be rendered against him in favor
of your petitioners for the damages aforesaid
together with all costs of this suit to be taxed
and as in duty bound your petitioners will
ever pray &c

Montgomery March 24. 1840

R. B. Pimney atty
for petitioners

True copy of writ of petition

filed in this case 28th May

1840

C. O. Storvick

Deist Clerk

And the said defendants by their
attorney say for and shew as come
and defend the aforesaid action and
for answer say that the matters things
set forth ~~are~~ in the said plaintiffs petition
are not true and that they pray may be
requred of by the country &c (say for & shew)

Joseph Lindley & wife
as ~~by~~ petition
Thomas J. Wood

In District Court
April Term 1840

Re Returns - John Long
Lyman Long Credit Cotton
July 15 1840 C.B. Starnes
debt ch

Filed March 24 1840

Pinner

51 No ~~100~~ 51

Joseph Lindley
& wife

vs

Thomas J. Wood

Alias Issued May 28 1840

Filed March 24

Issued March 24

Pinner

alias to James
To fall term 1840

Issued May 28 1840