

To the Honorable James C
Moores one of the Judges of the
Circuit Court of St Louis Co

The petition of Elizabeth
Bird a resident of the City of St
Louis respectfully shews that
Infant Bird an infant, aged
about ten years, and placed by the
Mother thereof under the special
care and control of this petition until
said child should become of age, is
now restrained of its liberty by one
Mrs Pattmore in this that said
child is confined at the house of
said Pattmore and by her not permitted
to return unto this petitioner its true
and lawful Custodian And that
said Infant Bird is so confined
and restrained at a house on
Eleventh Street between Cass Ave,
and Ballou Street, occupied by said
Mrs. Pattmore as this petitioner
is informed And that according
to the best knowledge and belief of
your petitioner, the Cause or pretense
of the aforesaid confinement or restraint
of said Infant Bird arises from
a purpose of said Mrs Pattmore to
secure and extort from said child
its services as demand, without ^{compensation} reward or
promise of same or other ~~compensation~~ And
your petitioner further states that
no application for the relief sought
has been made to or refused by any
Court officer or officers Superior to the
one to which this petition is presented
And your petitioner further states

that she is advised by her
Council Mrs. Clark & Cornly
of St. Louis and she believes
that the confinement and restraint
aforementioned is illegal and that said
illegality consists in the refusal
of said Mrs. Patton to permit said
child to return to its lawful
custodian and in depriving your
petitioner of the control and services
of said child.

Wherefore your petitioner
prays a writ of Habeas Corpus to the
end that said Infam^t Bird, by which
name she is usually known, may be
discharged from the restraint & control
of said Mrs. Patton - and returned
to your petitioner.

Dated at St. Louis

Jan 10 1867

Elizabeth Bird
aty

State of Missouri } Elizabeth Bird
County of St. Louis } the above named
petitioner being first duly sworn says:
That the foregoing petition is true
to her own knowledge except those
matters which are therein stated on
information and belief and as those
matters she believes to be true.

Subscribed before
me on this 11 day of
January A.D. 1867

Chas. C. Beaubien
Notary Public

her
Signature attested
E. W. Clark
Chof County



0-3965

Application for Writ of
Habeas Corpus by

Ely Ruth Bird -

Relator - for Release

of Miss Ruth Bird
Detained

Wm. Paul J. M.
Chas. H.

July 12th 67 Parties appear child produced could by Court
must Monday evening at 2 o'clock 54p
July 14th 67 all parties appear sub petition dismissed
Custody child awarded to Respondent 54p 517

The People of the State of Missouri
To Mrs Pattmore greeting

You are hereby commanded to have the body of ~~Missouri~~ ^{Missouri} Bird an infant Colored 5 yrs detained as it is Seiz together with the time and cause of such detention or confinement by whatsover name the said Missouri Bird shall be called or charged before the Hon James C. Moody one of the Judges of the St Louis Circuit Court at Court Room at the City of St Louis on the Twelfth day of January instant at one o'clock in the afternoon to go and receive what shall then and there be considered concerning the said Missouri Bird And have you then and there this writ

Witness my hand and seal of said Court this 10th day of Jan

1867

1867

James C. Moody

Allowed pursuant to law this 10th day of January 1867



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State of Missouri
County of St Louis

To The Honble Court

Your respondent upon
where your writ of Habeas Corpus has
been ^{served} to have the body of Missouri Bird an
infant before you asks leave to
state that said Child has been
living with respondent for some
fine week. That on last ^{week} Friday
one Lizzie Bird took said Child away
from respondents House & kept
her most of the day, when
the Child returned to respondents
house & has remained ever since

That respondent does not detain
said Child or use any restraint
towards her whatever that she
stays of her own choice & is free
to go when ever she pleases

Respondent states that she
has furnished said Child with clothing
& has taken good care of her since
the Child has been with her; that
the Child wants very much to
remain with respondent & that respond
ent is willing to keep the Child

That said Child is now here before your honor
Respondent would further respectfully
state that The said Leggy Bird
has mistreated & abused said Child
that the Child does not want to
go to her & in fact is much
alarmed at the idea of having
to do so and Respondent finally
states that she feels certain
that said Leggy Bird is not a fit
or suitable person to have the
Care & Custody of said Child

A. Fortman

Sworn to and subscribed
before me Jan 14th 67

H. W. S. Church
cl

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Return of
Frances Palmer

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