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To the Honorable the Judges of the Sangamon  
Circuit Court in Chancery State.

Humly Complaining, Sheweth unto your  
Honor, your Oratrix, Ailey Bancorn, that  
on the day Feb. 2. D. about twenty four  
years ago next February, she was lawfully married  
to one John Bancorn, whom she prays may be  
made a party to this bill as defendant, & that afterwards  
to wit, on the day of A. D. 1830  
she and her said husband removed to & took  
up their residence in the County of Wayne where  
she ~~has since resided for two years & removed from~~  
~~there to Union, Madison County, where they resided two or three~~  
~~years, & removed from there to Pike County Illinois, where they resided~~  
~~until the day of A. D. 1838. The said plaintiff declares~~  
~~and sheweth herself free from your Oratrix, without any~~  
~~reasonable cause, & has ever since her said separa-~~  
~~tion; & she further sheweth, that from the time of~~  
~~her said marriage until the death of her~~  
~~said husband as aforesaid, she continued to~~  
~~live with her husband, all the time performing~~  
~~all the duties of an affectionate and obedient~~  
~~wife. She also sheweth, that while she & her said~~  
~~husband lived together <sup>she had seven</sup> children by him;~~  
~~& that three of said children live with her, to wit, Thomas Shelton, Priscilla~~  
~~to wit, & that from the~~  
~~house, & will be provided~~

She has supported & maintained said children  
as since she had them, by her own labor, & that  
her said husband never contributed in any way to  
their support; and your Oratrix also sheweth, that her  
said husband, has treated her with violence &  
repeated cruelty, for two years next preceding the  
month of April A. D. 1841. ~~and that~~  
~~& also that her said husband was so addicted to~~  
~~habitual drunkenness for the period of two years next~~  
~~preceding the time last aforesaid; & your Oratrix~~  
~~also sheweth, that since the period last aforesaid, to wit,~~  
~~on the day of Sept. August 2. d. 1841 she~~

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removed to the County of Sangamon and State of Illinois, and your Orator files date, that during the month of April, A. D. 1841, she separated from her husband, who had repeatedly threatened to take her life, because she was afraid for his safety and respectability, & her & for his infant children, that he would take her, & he has also repeatedly threatened to take her life & gain separation, & she is afraid of the injury to her & her children. The Court cannot order otherwise, Near Orleans

Prays that the People's writ of Habeas corpus be granted to the said defendant to answer on his corporate oath, all & singular the allegations of this bill; & that on a final hearing of this cause, your Honor will decree that the bonds of matrimony heretofore and now existing between said defendant, & your Orator be forever dissolved, & that your Orator be decreed to have the care & custody of her said children, & that your Honor will grant such other & further relief, as equity may require, & as in duty bound &

<sup>her</sup>  
Attest ~~Alleged Plaintiff~~ ~~Robert Basson~~  
Mark ~~Robert Basson~~  
Set for hearing to

Subscribed & Sworn to  
before me this 13<sup>th</sup> day  
of September A. D. 1842  
Nathaniel Clark