

Leticia Carson ^{plff} }
 vs } Answer
 Green B Smith admr }
 Defendant }

1) Defendant for answer
 to plaintiffs complaint says, that it
 is not true that plaintiff worked labor
 and performed services for David Carson
 deceased for ~~many~~ ^{as shown in comparison} years & six months
 further were the services performed by
 said plaintiff for said Carson reasonable
 worth one thousand dollars

2) Defendant further answering says
 that he is informed and verily believes
 that said plaintiff was a slave in the
 state of Missouri and owned by David
 Carson deceased at the time said Carson
 removed with said plaintiff to Ariz-
 on sometime in the year 1845 and so
 remained up to the time of the death
 of the deceased David Carson unless
 of the removal of said slave was changed by the removal

3) That ~~as such slave~~ said deceased moved
 from the state of Missouri to Ariz-
 on some time in 1845 bringing said
 slave with him and she continued to
 reside with said deceased as one of his
 family for the term and during the time
 stated in the plffs complaint and not other-
 wise - Defendant says that the ^{deceased} Carson's
 clothing plaintiff & ^{her} children was reasonable
 worth as much as her labor and work

**District Court Benton County
October Term AD 1854**

**Lutitia Carson plff
Vs Green B Smith admr
Defendant**

1. Defendant for answer to plaintiffs complaint says, that it is not true the plaintiff worked labored and performed services for David Carson deceased for seven years & six months as stated in complaint. Neither were any services performed by said plaintiff for said Carson reasonable worth one thousand dollars.
2. Defendant further answering says that he is informed and verily believes that said plaintiff was a slave in the State of Missouri and owned by David Carson deceased at the time said Carson re-moved with said plaintiff to Oregon sometime in the year 1845 and so remained up to the time of the death of David Carson relation of master & slave was changed by the removal of the deceased.
3. That said deceased moved from the state of Missouri to Oregon some time in 1845 bringing said slave with him and she continued to reside with said deceased as one of his family for the term and during the time stated in the plffs complaint and not otherwise. Defendant says that the deceased boarded and clothed plaintiff & her children. This was reasonably worth as much as her labor and work.
4. Defendant says that the emancipation of said plaintiff was reasonably worth as much as any labor she did for the Defendant from the time he left the State of Missouri to the time of David Carsons decease.
5. Defendant says that during the time plaintiff lived with David Carson she was sick for the space of about ~~one year~~ six consecutive months in the years 1851 & 52 during all which time she was unable to work or labor for David Carson dec'd or even to wait upon herself during all which time deceased waited upon said plaintiff and employed & paid for her medical attendance at the instance and request of plaintiff. Defendant says then Decease David Carson boarded & clothed one of the children of the deceased from some time in 1845 when said child was born to the time of the decease of said David Carson.

Defendant says that David Carson boarded & clothed one other of the children of plff from 1849 when it was born up to the time of his death.

Defendant says that the boarding clothing of plaintiff & her children the attention bestowed upon her during her sickness the trouble & expense of bringing her across the plains was reasonable worth as much as any and all services rendered by plaintiff to deceased David Carson.

Defendant says that in the winter of 1849 plaintiff was taken to Joseph Gages in Polk county previous to her sickness and remained and was taken care of & boarded by said Gage at the expense of Deceased until she was delivered of a child & recovered. Wherefore plaintiff says that he is not Deceased David Carson

was not in his lifetime or Defendant since his death indebted to plaintiff in any sum whatever, having answered Deft prays to be discharged with his costs.

Kelsay & Logan
Defts Attys
Benton County SS

Green B Smith Defendant says that he has heard the foregoing answer read & knows the contents thereof and that to the best of his knowledge information & belief the statements therein made are true. Defendant says that he is informed by persons who knew said Carson Deceased in Missouri & in crossing the plains that plaintiff was a slave & belonged to said Deceased. Defendant also has a bill of sale of said Luitia Carson plaintiff to deceased David Carson

As to the sickness of plaintiff & the boarding & clothing of herself and children Defendant has made strict inquiries in regard thereto from those he supposed were informed and had been informed that the statements made in the foregoing answer as to the value of the plffs service & the value of boarding clothing plff & her children Plaintiff Deft has made strict enquiries to ascertain the truth from persons ? informed as Deft believes & these they inform him in the Statements in relationship as stated in the answer were correct and true.

Green B Smith
Administrator

Subscribed and sworn to
Before me this 10th day of
Oct AD 1854

Jas H Slater
Clerk

