

Lulshia Carson Pff

Dist Court Benton Co
Oct Term '84

Green B Smith Admr

Estate of David Carson decd

Replication.

Said Plaintiff for
replication to said defendant answer pleads
says that she affirms that her services for
seven years and six months as stated in her
said Complaint were reasonably worth one thousand
and dollars; ~~that she denies that from the~~
~~year 1845 she has remained a slave of said~~
~~David Carson deceased up to the time of his~~
~~death as in said answer alleged.~~ And
she further denies that she lived and continued
to reside in the family of said David Carson
decd. as one of his family merely, as in said
answer alleged, but she avers that she resided
in said family as a servant and performed
menial service as such during said period
mentioned. ~~And she further denies that~~
~~the compensation 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 Carson's death~~
~~as alleged in said Deft's answer.~~ And she denies
that said emancipation was any consideration to
said plaintiff moving from said David Carson.
And she further denies that plaintiff was
sick during the time plaintiff lived with David
Carson for the space of about six months consecu-
tively in the years of 1851 & 1852, and unable to
work a labor for said David Carson.

Dist Court Benton Co
Lutishia Carson Plf Oct Term 1/54
vs
Green B Smith admin
Estate of David Carson dcd

Said plaintiff for replication to said defendant answers pleaded says that she affirms that her services for seven years and six months as stated in her said complaint were reasonably worth one thousand dollars, ~~that she denies that from the year 1845 she has remained a slave of said David Carson deceased up to the time of his death as in said answer alleged~~, and she further denies that she lived and continued to reside in the family of said David Carson dcd as one of his family merely, as in said answer alleged, but she avers that she resided in said family as a servant and performed menial service as such during said period mentioned, ~~and she further denies that the emancipation of said Plaintiff was reasonable 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 as alleged in said Defts answer, and she denies that said emancipation was any consideration in said plaintiff moving ?? David Carson~~. And she further denies that plaintiff was sick during the time plaintiff lived with David Carson for the space of about six months consecutively in the years of 1851 & 1852 and unable to work or labor for said David Carson dcd.

And that he waited on said plaintiff and obtained medical aid as in said answer alleged. And she further denies that defendant boarded and clothed the children of said plaintiff in manner and during the time alleged in said answer. And she further denies that in the winter of 1849 Plaintiff was taken to Joseph Gages in Polk County and was taken care of and boarded by said Gage at the expense of said David Carson dcd as in said defendants answer alleged.

Wherefore she says she ought not to be barred by anything in said answer pleaded, from having and recovery of said defendant administrator aforesaid , the said full sum of one thousand dollars, or any part thereof.

Thayer & Grove
Attorneys for Plf
Territory of Oregon
Benton County

Lutishia Carson the above named plaintiff being duly sworn says that she has

heard the foregoing replication read and knows the contents thereof, and that the same is true to the knowledge of said plaintiff.

Subscribed and sworn to her

Before me this 11th day

Lutishia X Carson

of Oct AD 1854

Jas H Slater

Clerk