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At the High Court of Justice
Probate Divorce &
Admiralty Division
(Divorce)

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Middlecoat

Answer to Petition
for judicial Separation

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FILED 27 JUL 1891

Napoleon Argles Esq.
6 Lombard Court E.C.
Respondents' Solicitors

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In the High Court of Justice
Probate Divorce & Admiralty Division
(Divorce)

The 27th day of July 1891

Between Mary Henrietta Middlecoat
Petitioner

— and —
Francis Middlecoat
Respondent

Answer
To Petition for Judicial Separation

The Respondent Francis Middlecoat by messrs Napoleon Argles & his Solicitors, in answer to the Petition filed in this cause, Saith:-

1. That he denies that there have been ten children issue of his said marriage and says that three children born of the Petitioner since marriage are not his children as hereinafter set forth.
2. That he denies that he has been guilty of cruelty as alleged in the said Petition.
3. That he denies that he accused the Petitioner of having committed incest as alleged in paragraph 4 or at all.
4. That no magisterial decree of separation was granted to the Petitioner as alleged in paragraph 5.
5. That he denies that he has

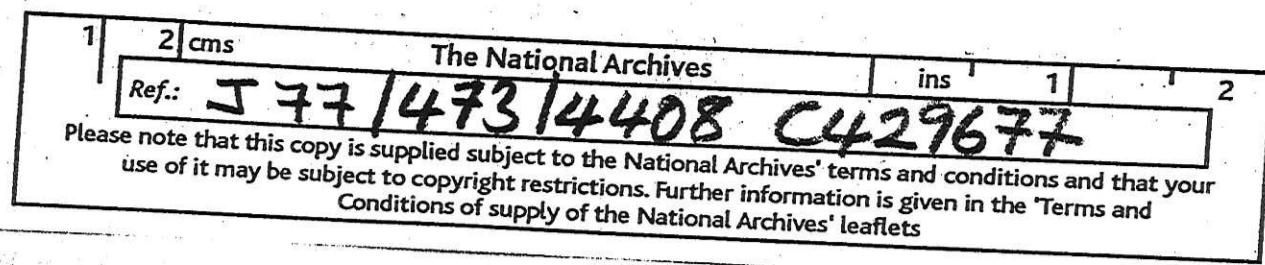
been guilty of indecent conduct in the presence of his daughter as - alleged in paragraph 6 or at all.

6. The Respondent further saith that in the year 1874 the said Mary Henrica Middlecoat at Bangalore in the presidency of Madras, India, and also in the year 1876 at St. Thomas in the said presidency of Madras - habitually committed adultery - with Colonel, then Captain Robert Tait, since deceased.

7. That between the years 1874 & 1881 the said Mary Henrica - Middlecoat at Bangalore aforesaid and at Palaveram also in the said presidency of Madras habitually committed adultery with Captain Algernon Henry Milner, with Sir Robert Dallyell, K.C.S.I. with Captain O.V. Boddy P.P.E. and with Captain Herbert Edward Parker.

8. That on the 6th day of May 1845 the said Mary Henrica Middlecoat at Bangalore aforesaid gave birth to a child Lucy of which the said Mary Henrica Middlecoat led the Respondent to believe the said Colonel Robert Tait was the father.

9. That on the 5th day of December 1881 the said Mary Henrica Middlecoat at Madras, gave birth to twins Margaret Harriet Locke and George Robert Burns of which the said



Captain Herbert Edward Parker is
the father.

10. That the Petitioner has condoned
the cruelty (if any) of the
Respondent alleged in the said
Petition.

Delivered the 27th day of July
1891 by Messrs Napoleon Argles & Co
of 6 Lombard Court in the City
of London Respondents Solicitors