

1805-016

SOUTHAMPTON COUNTY
CHANCERY PAPERS

ALLEN

VS

LAURENCE'S GUARDIAN

2/1805

other surnames: Foreman,
Williams

Allen - 4
" } Billed
Lawrence gr. } answer

Feb 1805

Inty Deane

To the justices of Southampton county, sitting in
chancery, humbly complaining sheweth to the
court, your orator William Allen.

That Jacob Lawrence died intestate
leaving a tract of land, lying in this county. That
Josiah Lawrence, Jesse Lawrence, John Foreman
and Mary his wife, Richard Allen and Presilla his
wife, and the children of Isaac Williams were his
heirs. That the said heirs advertised the said land
for sale, one half of the purchase money to
be paid in twelve months and the residue in
two years. That the aforesaid Jesse Lawrence
was present and consented to the said sale,
that your orator became the purchaser
and the said Jesse Lawrence and the other heirs
put him in possession thereof. Your orator
further states that the conveyance was by
the contract to have been executed upon the
first payment being made. He also states
that the said Jesse Lawrence has since died,
before the time for executing the deed, leaving
an infant child, named Jesse; To whom
Josiah Lawrence has been appointed guardian.
He states that all the other heirs of the said
Jacob Lawrence are ready and willing to execute
a deed agreeable to their contract, and that
as Jesse Lawrence the son of Jesse is underage,
he can not obtain a perfect right to the
land, unless by the interposition of this court.

In tender consideration whereof,
and for as much as your orator is remediless at
law, he solicits the intervention of your Worship.

To the end wherefore he prays
that Josiah Lawrence the guardian of Jesse
Lawrence may be made doct. to this bill of com-
plaint, and that he may full, true and
perfect answer make to all and singular

the allegations aforesaid; and that as fully as
if the same were here repeated and ~~he~~ there
particularly interrogated. He lastly prays
that your worship will decree that the said
Josiah Lawrence as guardian of Jesse Lawrence
join the other heirs of Jacob Lawrence in
making to him a good title to the said
land, or that the court will make any
other order or decree in the premises for
or against either as may seem just.
May it please yr.

The answer of Josiah Lawrence guardian of
Jesse Lawrence to the bill of complaint exhibited
against him in Southampton court, by William
Allen. He admits all the foregoing statements
of the complaint to be perfectly correct, and he
is willing to abide by any order in the premises
which this court may think proper to
make. He prays to be hence dismissed
with his costs in this behalf expended.