

1814-010

SOUTHAMPTON COUNTY
CHANCERY PAPERS

BROADSHAW'S EXECUTOR

VS.

HASTY'S ADMINISTRATRIX

4/18/4

No 302
Bradshaw

W
Party bill
of Junction

April 1809

Board filed &
Rule

May Rule to answer
June Rule for do

Sep. 1809 answer
filed rule to dispose

Apr 1814 Notice to May

To the worshipful court of Southampton
sitting in chancery humbly complaining
sheweth unto your worshipps your orator
Benj. Bradshaw Exr. of Benjamin &c.

That some time in the year - a
suit was instituted on the Common Law
side of this Court. By Angelina Basty adn
of John Basty on an account bearing
date in the year - to recover from
your orator as Executor to Ben. Bradshaw
du? a sum of money stated to have
been paid by the said John for your
orator's tentator upwards of twenty years
ago for taxes &c - which said acct. to your
orators own knowledge was fully settled &
satisfied as well as all other matters
existing between the parties previous to
the death of either of them when a
Negro girl by name of Nan was on
the adjustment of acct. delivered up to
the said Basty in full & complete
satisfaction of all claims whatever
which your orator is able to prove by
the evidence of sundry persons, Witnesses
to the settlement. That your orator
was once applied to since the death of
John Basty for payment of the same acct.

and that he to satisfy it and admit
did produce proof of the payment,
when the acct was thrown aside for a
considerable time — that since then
one of your orators witnesses who knew
the fact of payment having become
incapable of attending a Court of Justice
your orator supposes the admission
that she could remove the claim that
he verily believes she herself is aware
of satisfaction for all demands had been
made — Yet was induced to institute
suit in expectation of your orators
failure in future to prove the
transactions.

That your orator most
solemnly avers nothing was due to
the said Party from him this complainant
testator at the time of his death — &
at this present time Hasty is a debtor
to your orator a considerable sum
for having maintained him some years
thru the said Hasty's inability to
maintain himself, being in necessitous
circumstances. And yet so it is that
it please the Court that judgment was
notwithstanding entered against your
orator, who having no assets in

court of Law, prays this Court will
enjoin the judgment so unrighteously
obtained against him & restrain the
said Angelina Hasty from further
proceedings thereon until this matter
can be heard in equity; and your
complainant shall ever pray &c.

For 22
22

Southampton J.C.

This day appeared
before me John Lee — a Justice
of the Peace for the S. County of S. Town
Bay & Bradshaw Esq. of Benjamin
and made oath to the truth of
of the foregoing bill. Given under
my hand this 17th Day of Apr. 1809

John Lee
22

Haslys adm-
adms } Anna
Matshaw

The Answer of Angelina Harty about John Harty to the bill
of injunction exhibited against her by Benjamin Bradshaw
Esq Benjamin Bradshaw died.

This respondent saving and reserving to herself all benefit
of exception to all errors imperfections and untidiness in the
Complainants bill contained, for answer therunto or unto
so much thereof as is material and necessary for her
to make answer unto answering saith. That she knows
nothing about the settlement between the complainant
and the intestate spoken of in the Complainants bill
but she verily believes the Complainants statement
cannot be correct as she always understood this testator
was indebted to her intestate - As to the negro girl
mentioned by the complainant she was given to her
after her by her father in his lifetime and cannot
be considered, nor was she ever ^{been} considered as a purchase
made by Harty your respondents intestate of her father
As to proof of payment having being made to your
respondent by the complainant she your respondent
positively denies it - your respondent believing the
debt to be just and that it is most wrongfully detained
from her denying all fraud &c prays to be hence
dismissed with her costs in this behalf most unjustly
detained.

Southampton St

Sept 8. 1809. This ^{day} Angelina Harty known as John Harty
personally appeared before me a justice of the peace
for the said County and made oath to the truth of
the foregoing answer.

Wm Boykin

Angel Hartley

Wrote to

M. Bradshaw

Report to Miss. Griffin
Benja Griffin or their companion

L. S. The 14th 1811 I do hereby Certify that I do agree
To have my lawsuit between me and my Brother—
Benj^a Bradshaw taken out of Court and put to refer-
ence by men Chosen by each partie To hear the
Evidence and decide as they may think proper
By M^r Benj^a Bradshaw paying all Cost here
before arising in &c but given under my
hand This the day and date as above—

Test
Mike Griffin

Myelina ^{his} Hasty
mark