1834-015 SOUTHAMPTON COUNTY CHANCERY PAPERS BRADSHAW VS. GRIFFIN et al 6/1834

other surnames: DREWRY

Bradshaw
vs
Greenwood &c

Bill of complaint

1834 June. Injon: awarded on
giving security &c

To the worshipful the County Court of Southampton in chancery sitting

Humbly complaining sheweth unto your worships your Orator Martha Braddock that under the will of her deceased husband Braddock, the head of this estate in a negro girl by the name of Cate, & after her decease by the said will the said girl was bequeathed to Nancy Griffin the daughter of this complainant - that the said girl was brought up by her from her infancy, and she felt that sort of attachment for her, which so often exists under such circumstances & would not have consented to any measure which would have caused her removal out of the family - That the grandson of your complainant Burwell Griffin having as your complainant understood and believes, made an arrangement with his mother, by which he was to be entitled to the interest of the said negro girl Cate, in order to perfect his title, agreed to purchase your complainant's life interest for a stipulated sum

under the express and positive agreement and understanding, that the said negro girl Cate was to remain with your complainant during her life, which at her very advanced age, would not in all human probability be many years — That the said Burnett Griffin your complainant would have resolved at the first perfection if she could have obtained a positive, that the said Burnett Griffin her grandson, would have the particular of this express understanding home towards the little girl from her & agreement when the girl grew up and sold her even in the neighbourhood much less to a speculator in slaves who would probably remove her for sale to some distant market — your complainant states that when the said Burnett Griffin exhibited a deed of relinquishment from her to him for the said negro girl Cate, she objected to it because it did not contain an express clause, declaring the true intention of the gift during life, & that when said before the execution of the said relinquishment, he the said Burnett Griffin in the presence of one or more witnesses declared, that it was intended and expressly understood that she was to retain the possession of the girl during her life, and that in order to perfect this delay it was necessary that she should deliver the said girl to him, that he would keep her a day or two and then would then return her to your complainant to be kept by her during her life, & that accordingly a few days thereafter the same was delivered to your complainant —

your complainant states, that a short time after the redelivery of the said girl Cate, the said Burnett Griffin came to your complainant, and asked her to let his mother have the use of the said girl for a day or two and under that false and fraudulent pretence your complainant permitted him to carry the girl away — and that a short time afterwards she understood that the said Burnett Griffin had sold the said negro girl Cate to one Depew a negro driver, who purchased her to ill employ, and your complainant believes will remove her without the limits of Virginia unless this honorable court should interpose to prevent it — In tender consideration whereof your complainant prays that the said Burnett Griffin & the said Joseph Depew may be made defendants hereto and may answer the premises on oath, that the said Burnett Griffin

and the said Joseph Bracey & all persons claiming from & under them may be restrained from removing the said Gin, without the permission of this Court, until the matters herein set forth can be heard and determined, and that the said Barnett Griffin may be decreed to restore and redeliver the said Gin Cake to your Complainant according to the terms and conditions of his said agreement to be held by him during life and that your worships may be pleased to grant such other and further general relief touching the premises as to your worships may seem agreeable and just and that the commonwealths writ of Injunction may issue commanding &c and your Complainant will ever pray

Southampton County to wit

Personally appeared before me a Justice of the peace for the said County Martha Braddock and made oath that the facts set forth in her bill of complainant above, are true

Given under my hand and seal this 17th day of June 1834

Silas Summerell