

Showing and shewing all the words
of John White and Thomasine his
wife Defendants to the Bill of Douglas
of Christian Storinge Plaintiff

Part 2
Rev. J. White

The said Defendants, having and at foreign
to your pleas now and at all times & places
see benefit and advantage of your own to
the manifest inheritance & interests
in the said Douglas's Bill of
Douglas's Plaintiff for the words
expressed and to the more benefit of us
for any way materially downe the
Defendants, to make Answer unto the said
And first the said Defendant John White
for himselfe saith that he is not
the Defendant beinge possessor of a good
and absolute estate in the said

A

promises in the bill mentioned And
upon a treaty made by the Defendant
the Defendant did then promise and
agree that for the consideration of the
sum of one hundred and fifty pounds
to be paid by the Defendant
to the Defendant at a day then agreed
upon and for other considerations and
benefits agreed upon that the
Defendant would make and grant unto
the said Defendant a good and absolute
estate in the premises as in the bill is
set forth, And the Defendant party for
it was likewise then agreed between
the Defendant and the Defendant

2.

to deliver and yield up unto the
Dampnysant, all such deeds, charters
and writings as they have or do any way
Dampnysant by said Statute, and to make
good the said Statute, in every part
to the Dampnysant, his heirs and
Dampnysant by the premises provided
that the Dampnysant will according
to the Statute, and premises in
the said Statute and unto the
Defendants, and to the said parties
of the said Statute made unto the
Dampnysant by the Defendants the
which the said Statute and unto the
Defendants, Dampnysant and the said parties

(+)

of Inventio ffro gained and also make
good and I have by writs Regis Infractis
an estate in fee and promises for your
sire writ according to the said agreements
and make good and perform to your heirs
all such obligations, covenants and agreements
as now to be done and performed by
the said plaintiffs, and Regis Infractis
for wholly done that the said plaintiffs
at any time according to the said agreements
promised to make back and thereby
an estate in fee promises for your
heirs writ and in fee is falsely
alleged but the said plaintiffs refused
done to do the said writ and the said
to

knowen to make two Defendants
to stand by their wrights of Law
And two Defendants (one wright party)
that shall borrow and take any
at Interest of the Plaintiff
the said Plaintiff named for any
Demandable good provided
from the Defendant but the Defendant
I only that the said Plaintiff named was
or is any part of the purchase
money as the Plaintiff says in his bill
falsely alleges. And the Defendants
doe deny of the same and say they are
any Mortgage Judgment, or any other
Jurament, upon the said of Law

Satisfied and paid for same and yet
taken off the said Mortgage and is
ready to deliver up the same with
the conveyance and the said
John White purges such that you
his party pay mortgage to the said
wages a fine but the said Defendant
does some that he said Thomas
was to write the said and that the
conveyance was to be made
conducted, and the said Defendant Thomas
does say that the conveyance
or any other by his appointment to his
Defendant's knowledge was made to take
away and receive ^{possession} of the manor

9

you or your heirs. I shew and
over refused to send out and leave
possession of the said lands as in
the is falsely alleged but the said
say that the said Count or his heirs
by your order as their dependants
but informed must to take possession
of the said land and ground belonging to
the said lands as of right and
quietly ^{and} for the said dependants know
to be contrary, and their dependants
say that they are ready and willing
to give up quiet and genuine possession
of the said lands unto the said Count
at any time or season to be named

... your auto requirid, provided that
... I am all well give good security
unto your Iohndes, to make good
... of late unto you for your two
... according to the Douglas's
... and agreements and copy
of your Iohndes, doe justly and
... doing all and all manner of
... and ...
... or other of them are charged
in the bill of Douglas, and do
... of your ... and pay that
... that ... matter
... bill of Douglas
... material or essential in

the same for the Defendants or
sister of the same to make a return (but
as I will give you on the 11th of
sufficiently answered unto Douglas and
avoided transfer of the same as that all
my matters and things by the Defendants
and sister of the same are ready to be
justified maintained and proved as
Court shall award. The

be your self in the way of the
Dorset and George with behalf wrongfully
signed

By the Court of the King's Bench in the Court of the King's Bench
the 10th of the month of August 1711
The Court of the King's Bench in the Court of the King's Bench

John Colles
John Good



Refund

Walter & Co

Shoung

Eds

Wm. R.

21/3