

March Court 1717

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AND the app^t by Thomas Bowne swaithly saith that the app^t Deft his discount
of Nineteen pounds four Shillings & three pence half penny Current money —
above sett forth against the said plt. to have ought not because he saith true it
is the app^t plt. at another time viz. the Seventh day of March in the Year of our
Lord Christ One Thousand Seven hundred and Seventeen at S^t. Pauls parish
in Kent County within the Jurisdiction of this Court at the instance and request of
the said Deft had accounted with the app^t Deft of divers Sums of money to the said Deft by app^t
plt. before that time Owning & unpaid and upon that Accounting the same plt. was
found in Arrear towards to the said Deft in the Sum of Eleven pounds eight Shillings
nine pence half penny Cur. money of Maryland and further saith that the said plt.
after that Accounting viz. the Seventh day of March in y^e Year afo^r at the parish County &
Jurisdiction afo^r offered to pay y^e same Deft the said Sum of Eleven pounds eight Shillings and
Nine pence half penny and that he the said plt. always after the afo^r Seventh day of
March hitherto was ready and yet is ready to pay the app^t Deft y^e same Eleven pounds
Eight Shillings and Nine pence half penny that is to say at S^t. Pauls parish in Kent
County within the Jurisdiction of this Court afo^r and the app^t Eleven pounds eight Shillings and
nine pence half penny the same plt. here in Court professes to pay the said Deft if the same
Deft y^e same Eleven pounds eight Shillings & nine pence half penny of the app^t plt. will
receive without this that the said Deft hath executed in manner and form afo^r &
become due to him the said Deft from the said plt. for the said Sum of Nineteen pounds four
Shillings and three pence Cur. money and this he is ready to verify wherefore he
prays Judgment of the app^t Deft his discount of the Summe of Nineteen pounds four Shillings
and three pence half penny against him the said plt. to have ought and pray Damages
Occasioned by the premises to him to be adjudged Admitted & True

AND the app^t Laughlin Fleim saith that y^e replication afo^r in manner and form
afo^r pleaded and y^e matter there in contained is not sufficient in y^e Law for him y^e.
It urges his action afo^r against him to have or maintain to which the said
Laughlin hath not Exception nor by the Law of the Land is in any sort bound
to answer & this he is ready to verify wherefore for want of a sufficient
replication in this behalf the same Laughlin prays the Judgment of the
Court and that the app^t Hughes from his action afo^r against him y^e said Laughlin
may be precluded

AND for cause of Demurrer according to the Statute in such Cases made
& provided the said Laughlin saith that he did tender an Issue unto the
said Plaintiff that he the said Deft had an Account of Nineteen
pounds four Shillings and three pence half penny Current money against
him the said plt. to which the said plt. did not joine Issue as by Law —
and according to all rule of pleadings he ought wherefore and for many
other causes & Imperfections in the said replication as also for that the
said —