with the letter (B.). And your Petitioner further States that the Said Valentine Hoffman and William N. Dunkirk refuse to act under Said last will and testament; and that they have in due form of Law refused and renounced to take upon them the burden of Said executorships, and that letters of administration were then granted - Ann S. Heckrote as will appear also by Exhibit (B.).

And your Complainants further State that after the Execution of Said instrument of writing marked with the letter (A) your Complainants testator Eligabeth Brumley held & use Said Negro together with her Children hereinafter mentioned as her own, and that William Heckrote nor John Shaffer neither Claimed title to them in her lifetime, but always considered them the property of Said Eligabeth - And your Complainants herewith Exhibits a letter of William Heckrote one of the defendants marked with the letter (C).

And your Complainants further states, that since the death of the Said Eligabeth a Certain John Shaffer who intermarried with one of the daughters of Said Eligabeth has taken possession of the Said Negro Woman, together with her Children begotten, since the Execution of Said instrument marked (A), heretofore Exhibited and Claims & uses the Same as his own property denying all title in your Complainant either legal or equitable and pretends and insists that he hath a title to the Said Negroes, When in truth your Complainants are justly and equitably entitled to the Said Negro Slaves -

And your - further states that they are in want of Means to support themselves, and that their Circumstances are such that they can receive little or no education unless it be by the use and hire of the Negro Slave Ginny and her Children - The Said Negro Children being known by the names following Sarah, Sally, Joseph, & John. And your Complainant further states that John Shaffer one of the defendants has enjoyed the Services of Said Negroes and still does since the death of Said Eligabeth and refuses to account to any person for the Same and that your Complainants are entitled to a very large Sum for and in Consideration of the ~~[illegible]~~ Services of Said Negro Slaves, and that in Consequence of the fraudulent intentions and design of the Said William Heckrote and John Shaffer, your Complainants are greatly injured and are without remedy excepting in your Honorable Court. and your Complainants believe it would more Completely effect the intentions and design of Said Eligabeth Brumley of Said Negroes were Sold and the proceeds appropriated to the Maintainance and Education of your Complainants - And to the end that the Said John Shaffer & William Heckrote account to your Complainants for the use and hire of Said Negroes; and that the Said Negroes may be decreed to be Sold by a Trustee to be appointed by your honors - And to the end that the defendants William Heckrote and John Shaffer may in their oaths answer the premises. And that your Honors grant to your Complainants any further or other relief in the premises as the Nature of the Case may require - And May it please your honors to grant to your Orators a Subpoena to be directed to the Said John Shaffer and William Heckrote. Commanding them to be and appear in your honorable Court, to answer the premises, and to stand to, and abide by such order and decree therein as to your honors may seem right - and your Orators will ever pray and &c &c -

Thomas Perry
Solicitor for Complainants

True Copy
Test - Aga Rozell Clerk