

To the Honorable the Judges of Allegany County Courts as a
Court of Equity.

The Petitioner of John Shaffer of Allegany County respectfully
represents that on the 11th day of October 1833 Catherine Heekrote
and others by their next friend Aaron G. Heekrote ~~filed in this~~
Bill in Allegany County ^{Court} as a Court of Equity against your
Petitioner and a certain William Heekrote being No 219 on the
Chancery docket of your Honorable Court, as will appear by
reference to said bill.

Your Petitioner further represents that he employs a certain
John McNeill Jr. an atty and counsellor of this Court to attend
to the said cause for him and that the said John McNeill Jr. drew
the answer of your Petitioner which was filed in this cause on the
on the 15th day of October 1834. Your ^{Petitioner} can neither read writing nor
can he write and when the said McNeill drew the answer for your
petitioner the said McNeill misundrestood your petitioner and
if the said McNeill read the answer correctly to your Petitioner
and as he now finds it drawn your petitioner did not understand
and the said answer, for it makes him say what he never intended
to say and what is not true, as follows "That the negro women
mentioned were originally the property of Elizabeth Browning of this
County decedent under whom those plaintiffs claim title"
When your Petitioner intended to say, and did so state to the said
McNeill that the property or negro woman mentioned was origina-
ally the property of Henry Otto's executor and that your petitioner
purchased the said negro woman at Sheriff's sale from the
deputy sheriff of Washington County. That your Petitioner did
so purchase the said negro woman was and is a fact well known
and which your petitioner nor complainant ever denied, nor did
your Petitioner ever mean to state otherwise, or that the negro woman
was originally the property of Mrs Elizabeth Browning.
Your Petitioner therefore prays that as this is clearly a mistake
your Petitioner may have leave to file a supplemental answer
correcting the answer in this particular statement, and your
Petitioner will ever pray &c

Thomas J. Mcraig