

Twenty four Thousand pounds of Tobacco to recover the Said Land Last mentioned to the Def<sup>t</sup> which he the Said Adams Afterw<sup>as</sup> refused to do Al-  
 ledging that his So doing would be an Evidence of fraud and give the Compl<sup>t</sup>  
 Some advantage Agt him but yet keeps every foot of the Land having paid in  
 all to the Compl<sup>t</sup> only Three Thousand Six hundred and forty pounds of  
 Tobacco or Thereabouts that this Def<sup>t</sup> Knows of that the Def<sup>t</sup> made over all  
 his Cattle to the Said Adams and Deliv<sup>d</sup> part of them to him or his ord<sup>r</sup> and  
 carried Some of his Household Goods to his house with Intent to prevent  
 their being Taken in Execution by the Comp<sup>lt</sup> with the Said Adams Consent  
 and privity without that any Matter or thing in the Compl<sup>ts</sup> bill Contained  
 and herein and hereby well and Sufficiently answered Traversed or Denied  
 all which Matters and things this Def<sup>t</sup> is ready to aver and mantain as the  
 Court Shall Direct and prays to be hence Dismissed with his reasonable Costs  
 most Wrongfully Sustained.

21<sup>st</sup> Febr<sup>y</sup> 1722. The Defendant W<sup>m</sup> Brewerton Makes Oath that the  
 facts Contained in the foregoing Answer as of his own knowledge are true  
 and what relates to the Acts of Others he believes to be True

Sworn to before

Benj<sup>a</sup> Tasker

Thereupon the Said Cause Stands further Continued Untill the Next  
 Court at w<sup>ch</sup> Said Court (To Witt) the Ninth Day of July Anno Dom 1723  
 Comes as well the Said Complainant by his Council as the Def<sup>t</sup> Adams by his  
 S<sup>d</sup> Council and thereupon the Def<sup>t</sup> Adams his Demurrer to the Complainants  
 Said Bill Coming to be Argued before his Honour the Chancellor in pres-  
 ence of the Complainants and Defendants Adams Council and the Allega-  
 tions on Both Sides being fully heard and Mature deliberation thereupon  
 had it was ordered that the [755] Demurrer be overruled and that the De-  
 fendant Adams answer be filed by the Next Court and also Decreed that the  
 Defendant Adams Pay Six hundred pounds of Tob<sup>o</sup> for the Delay etc.

And Thereupon this Cause Stands Continued from Court to Court Un-  
 till the 18<sup>th</sup> Day of Febr<sup>y</sup> Anno Dom 1723 At which Said 18<sup>th</sup> Day of Febr<sup>y</sup>  
 Come as well the S<sup>d</sup> Compl<sup>t</sup> by by [sic] his Councill af<sup>d</sup> as the Def<sup>t</sup> Adams by  
 his Council and thereupon the Said Adams by his Said Council Exhibited  
 his answer which follows in these words Viz<sup>t</sup>

The Seperate answer of Alexander Adams of Somersett County Clerk one of  
 the Def<sup>ts</sup> to the Bill of Complaint of John Caldwell Complainant

This Defend<sup>t</sup> now and at all Times hereafter Saving and reserving to  
 himself all and all manner of Benefitt and Advantage of Exception to the  
 Manifold incertainties and Insufficiencies of the Compl<sup>ts</sup> S<sup>d</sup> Bill of Compl<sup>t</sup>  
 for answer thereto or to So much thereof as this Def<sup>t</sup> is Advised is anywise  
 materiall for him to answer unto Answereth and Saith he believes that W<sup>m</sup>  
 Brewerton the other Def<sup>t</sup> in the Bill mentioned was indebted to the Compl<sup>t</sup>