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April Court 1702

William Frisby - 2 Maryland by John Jones Adm. of Sutton
Sutton Quincey Adm. of Kent County - Quincey Adm. of Cecil
County deed was summoned to answer
unto Wm Frisby of a plea that he had

in the full and just sum of twelve hundred forty and
eight pounds of good sound bright tobacco in bags clear
of ground leaves and all other trash which from him he
unjustly detains.

Whereupon the said William by Richard Macklin his
Attorney says that whereas the said Sutton Quincey in his
life time he on the thirtieth day of March Anno Domini 1697
at Kent County within the Jurisdiction of this Court by
his certain bill or writing obligatory sealed with
his Seal as in and to each and every doctored and herein Court
brought whose date is the said day and year did bind
himself his heirs &c. and Adms to pay or cause to
be paid unto the said Wm Frisby Adm. or his
(on demand) the said sum of 1248 tobacco qualified as
aforesaid in the said Sutton's Deed being plantation
in Cecil County yet notwithstanding the said Sutton in
his life time the said sum of twelve hundred forty eight
pounds of tobacco according to the tenor of the said bill
& obligatory unto the said Wm did not pay neither
did Joyce Quincey Adm. of the said Sutton Quincey who should
pay the said 1248 tob. Nor neither did the said Joyce and
the said John Jones after their Intermarriage pay the
said 1248 tobacco nor neither hath the said John Jones
after the death of the said Joyce paid the said 1248 tob
altho' often demanded but the same to pay they have
denied and refused and the same to the said Wm to
pay the said Wm Jones will doth deny and unjustly detains
the said Damage of the said Wm Frisby of 2400 tobacco

And thereupon he brings this Suit
Macklin & of. J. Jones &c. J. Jones &c.

And the said Defend. by Michael Earle his Atty. Couns
and Defends the said and Jurry whereof and prays leave
to impart herunto until next Court, and he hath it.
The same day is given the plaintiff also - (al