

Saith he hath been informed and hopes to prove that the said Coupl.  
 well knowing the Danger of forfeiting the said Bond for want of  
 warranting and ~~the~~ giving of Gadshill to the said Knighton & his  
 heirs according to Seal and Covenants Therefore the better to secure  
 himself did by some unfair means procure and grant or Conveyance  
 thereof from the said George Simons and Eliz. his wife under the  
 Pretence of fifty pounds Sterl. tho' really and bona fide as this Def.  
 hath been credibly informed little or no part thereof was ever paid  
 as in and by the said Bill is set forth and mentioned whereupon shortly  
 after the Coupl. did commence a Suit at Law and brought his Action  
 of Trespass and Ejectment against this Defend. who obtained a  
 Nonsuit thereupon as by the said Bill and that the Coupl. did  
 shortly afterwards (as this Def. hath been informed) procure an  
 Act of Assembly in the Name of the said George Simons & Eliz. his  
 wife without their privacy or Consent to confirm the said Will  
 after which the said Coupl. did prosecute another Action of trespass  
 and Ejectment ag. this Defend. in her Majesty's provincial Court  
 and the Jury therewith charged brought in a Verdict for this Defend.  
 And this Defend. being a purchaser und. the said Thomas Knighton  
 the son and heir at Law to the said Thomas the father for the Consi-  
 deration of the said Tract of Land called Marshes Seab being an  
 very Ancient Tract and being that the said Gadshill is of a young  
 date and that both by the said pretended patent of Gadshill and  
 the said pretended will of the said Thomas Knighton the father  
 said Gadshill is said to be adjacent and so consequently of the bound  
 Marshes Seab and could never be intended by the said will to deprive  
 the said Thomas his son and heir at Law of the greatest part of  
 Marshes Seab and this Defend. claiming under him as aforesaid which

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