the Said Robert before two Justices according to Law Seale deliver &
Acknowledge a Sure Estate in ffee Simple to the Said Robert —
Smith in the Said fifty Acres of Land as ye Said Pryor thou thought
But that by the Crafty and Cunning Contrivance of Said Robert
instead of perfecting a bond Conditioned to make over the fifty
Acres of Land and was Ignorantly and contrary to his agreemt.
or thoughts prevailed on to Signe a bond of the penally and —
Conditioned that he and his wife Should make over a Sure —
Estate in all the Lands that of Right descended to her as heiress
of her father Michael Pinnell Vanderford dec.d being by Estima:
:tion four hundred Acres more or less and the Condition of the Same
read to him in other words thou were therein Expressed And that
Romatus Smith and Anthony Joy Esq.rs of Said Robert Smith have
unequitably commenced a Suit on Said bond in the prov.l Court
in order to recover the Penalty of the Same by reason he and his wife
refused to make over all their right to all her Lands descended
as aforesaid tho' he never refused to make over the fifty Acres of
Land he really and bonafide agreed to and all tho the Pob.l which
the Said Robert in his life time obliged himself to pay the Said
Richard Sweetnam and the Said Pryor is not yett paid
all which Actings and doings of the Said Anthony and Romatus being
Contrary to the rights of Equity and good Conscience and the Said Edm.d
Pryor not being relievable Save in this honble Court humbly prayed
her Majestys most Gracious Writs of Injunction and Sup.a to be directed to
the Said Romatus and Anthony Commanding them to Surcease any further
prosecution of the Said action at Law and be and appear in this honble
Court true and perfect Answer to his Said Bill of Complaint. —
And the Said Romatus and Anthony for Answer thereunto Answered
followeth That they were not privy to the Agreement between their
Testator and the Complainant, but verily believe and doubt not to
prove to this honble Court that the Same was a fair & Franch:

agreem:

Agreem:
Surmis:
the Mon:
her Maj:
said Rum:
Condition
heirs of
Smith em:
was fair
Refused
purchase
doubt no:
Land nou:
Defend.ts
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of both par:
Keeper of
in our Sai:
be relieved
and that Edm:
and Rumo:
and in one:
the East Side
Warrantee
Claiming un:
to the Said R:
by Estimation
Divided be: