of the Said Robert Smith to require & have from them the Said Renatus and Anthony
the aforesd the aforesd Sume of forty pounds Sixteen Shillings Sterling Neither the
=lest the aforesd Renatus nor Anthony nor either of them in their Capacity aft-
Since the Death of the Said Robert and Letters Testimentary to them in due form of
Law granted And returne of the Said Original First Bill of Exchange Protested
in manner & form aforesd unto the Said Benjamin &c the aforesd Sume of forty pounds and
Sixteen Shillings Sterling according to the tenor of the Said Bill and Act of Assembly
aforesd have not paid nor for the Same in any wise give Content Altho upon the
First day of May Anno Dom 1708 at Kent County aforesd within the Jurisdiction aforesd
& ever Since by the Said Benjamin &c they have been required but the Same
to them to pay have denyed and as yet do deny & gainsay to the Damage of them
the Said Benjamin &c of Fifty pounds Sterling and of this they bring Suit
&c. Philipson pro Lauer Bas Pledges &c. {Jno Doe / Richd Roe}

AND the Said Defts by Richard Hunter their Attorney Comes and Defends
the Force and Injury when &c & for plea Saith the Deed on the Said pltfs & the
matters in the Same Contained is Insufficient in Law to Compel them the Said Defts
to make Answer thereunto and that they need not nor by the Law of the Land are
they bound to make Answer to that Declaration and therefore for want of Good
and Sufficient Deed on the Said Pltfs and Sufficient matter form & Certainty in
the Same to be Contained they the Said Defts Demurr in Law and for cause
of Demurr Shew with the

1 The Pltfs in the Said Deed on Says (dated ye Same day & bore said) omitting in what
year & Directed to a Certaine Mr Edward Smith Lace silk man in London &c)
but what they Intended by &c in that part of the Said Deed on the Said Defts Cannot Certainly
know & therefore Impossible to Answer a Right

2 The Said Pltfs in the Said Deed on Say the tenour & Contents whereof are as
follow viz (att the First of the aforesd three bills of Exchange he did require
the Said Edward att 30 Days Sight of that his First of Exchange his Second
nor third paid to pay unto Jeremiah Miles or to his order the Just Sume of 34
Sterling money of Old England for like value Recd by him recd to make good
payment and Charge the Same to Acco of Said Robert by the Subscription of
ye humble Servt Robt Hill (which is Erroneous) having neither date
Form nor Certainly Contained in Said First bill as recited in the Said Deed on
3 ... and the Said Pltfs in the recitemg of 2 & 3 bill Say (ye Servt Robert
Hill as before

4 The Said Pltfs in the Said Deed on Say that for a valuable Consideration
by him the Said Robert Smith of them the Said Benjamin and Company then &
there had and Received viz upon the Eleventh day of Octber aforesd &c did Endorse
& Deliver the aforesd three bills of Exchange &c Did upon himselfe assume
and-