

June 21 1708

Philipson their atty and the said Defts by their atty And the said
Wife by their said atty declare

Kent County - Edward Scott & Thomas Ruggold both of Kent County afd Gent
in Maryland vs the said of Last will & Testament of Elias King late of Kent County afd
Gent Deced word attached to ans^o unto Dominick Kinslagh of
said County Planter & Margaret his wife Administrat^r of all & singular the Goods &
Chattells Rights & Credits w^o word of Daniel Kelley late of Kent County afd Deced
of a plea of Trespass upon the Case

AND Whereupon the said Adm^r by Christopher Philipson their atty say
that Whereas the said Elias in his life viz in the years of our Lord 1698, 1699 & 1700
had at y^e spee^e Justice and Request of him the said Elias at Kent County afd w^o in
y^e Jurisdiction of this Co^o then Deed of said Daniel in his life time several Quantities
or Sums of ~~the~~ amounting in the whole to the Sum of two thousand eight hundred
nearly Eight pounds of Tobacco as by a Receipt for the same bearing date the
Seaventh day of August Anno Dom^o 1700 may more certainly appere and
Whereas likewise in y^e year of our Lord 1701 - he the said Elias then in his life
time att y^e place afd at his spee^e Justice afd by y^e hands of Edward Scott one
of the said Co^o of said Elias received 7 hogheads of Tobacco more w^o neate 3382 of
Tobacco as by Receipt dated upon the 9th day of February in the said year of 1701
may more certainly appere w^o said Receipt amounting in the whole to nine
thousand two hundred Eighty pounds of Tobacco being y^e Cigaretts thereof he the
said Elias in his life time viz on or about the fiftenth day of May Anno Dom^o 1702 at
Kent County afd within y^e Jurisdiction afd then in the life time of him the said
Dan unto him the said Daniel there faithfully promise that he the said Elias for
the afd 9280 of Tobacco when therunto required would well & faithfully pay in
Merchantis or otherwise to the said Daniel make good & full Satisfaction for the
same w^o the life the afd Elias his promise & assumption afd in form afd mad^e
not regarding the afd Sums of 9280 of Tobacco in the life time of him the said
Daniel viz upon the afd 15th of May 1702 afd at Kent County afd within the Juris-
diction afd he hath not paid altho y^e same to doo by y^e said Daniel he was then & there
required neither hath he paid the same unto the said Margaret wid^e & Relict of the said
Daniel since the death of the said Daniel altho y^e same to doo upon the Eleventh day
of May 1703 in his the said Elias's life time unto the said Margaret he promised faith-
fully or otherwise to come to and in some reasonable time and good & due man^{er}
of Due Satisfaction there fore - AND Whereas the afd Margaret did accept
of the afd promise of him the said Elias as afd made upon the 11th of May afd
in the year of 1703 afd at Kent County afd within the Jurisdiction afd and
did upon the first day of May Anno 1703 in the life time of him the said Elias
demand