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March Court 1716
Parish in Kent County aforesaid within the Jurisdiction aforesaid was indebted unto
the aforesaid Daniel in the Sum of Seven hundred pounds of Merchantable
Tobacco by him the Same Daniel at the like Special Intimation & request
and for y^e proper use of the Said William then & there last Said laid
out and expended and so being indebted the Said William in Consideration
thereof afterwards by the day and year last Said in the County & Jurisdiction
& parish last mentioned faithfully promised that he the Said William the
aforesaid last mentioned Seven hundred pounds of Tobacco to the Said Daniel
when thereunto required would well & truly pay & Content yet the aforesaid William
his severall promises & assumptions aforesaid little regarding but fraudulently
intending the Said Daniel in that behalf to deceive and defraud the aforesaid
severall Sums of Tobacco in y^e whole amounting to fourteen hundred
pounds of Tobacco to the Said Daniel all this afterwards by the third day
of June Anno Domini Seventeen hundred & fifteen and often after
he was at y^e parish aforesaid in the County and Jurisdiction aforesaid thereto required
hath not paid nor for the Same made any Content but that to pay or
Content the Said William hitherto hath denied and yet doth deny to y^e
Damage of the Said Daniel Two Thousand pounds of Merchantable Tobacco
and thereupon he brings Sute he. *ROBERT Dyer pledge* *In Doe*

And the aforesaid by his attorney aforesaid prays that the aforesaid Debt to his Debt
aforesaid may enforce And the aforesaid Debt by John Johnson his atty comes &
denies the force & injury when he. And saith that the aforesaid plt his action
aforesaid against him the Said Debt to have or maintain ought not because
by protestation not acknowledging any thing in the Dec^r aforesaid to be
true but for plea the Said Debt saith that after the assumption &
promise aforesaid supposed to be made & before the aforesaid plt brought his action
aforesaid against the Said Debt by the first day of July in the year of our Lord
one Thousand Seven hundred & fifteen at the parish of St. Pauls in the
County aforesaid & within the Jurisdiction of this Court the Said Debt & the Said plt
came to some discourse concerning the Said Sum of Seven hundred pounds
of Tobacco in the plt's above Dec^r mentioned to be due to the Said plt as
aforesaid to the Said plt did then & there in consideration that the Said Debt
did then & there upon himself assume to build a certain Tobacco house
for the Said plt's use and at his the Said plt's request the Said plt did
then and there promise to the Said Debt that he the Said plt would
release & acquit the Said Debt of & from the payment of the Said Seven
hundred pounds of Tobacco for the Said plt above declaration menti-
oned and this he is ready to verify wherefore prays judgment if the
Said plt. his action against him the Said Debt to have ought he.

Johnson & Debt
And the aforesaid plt by his aforesaid attorney saith that he by any thing by the
Said