

Louisa J^r

The Answer of James Watson Executor of the Last Will
And Testament of James Watson Deceased Defendant in the Bill in Chancery Exhibited
Against him by Robert Michie and Ann his Wife Complainants
This Defendant Now and at all times hereafter saving and
Reserving to himself all Benefits and Advantages of Execution
to the Many Uncertainties, Insufficiencies and Untruths in the
Said Complainants Bill contained for Answer therunto assents
so much thereof as this defendant is advised, materially con-
cerns him to make answer unto, he answereth and saith
that he admits it to be true that the said Complainant Robert
did intermarry with his wife Ann some time in or about the
year one thousand seven hundred and
but as to the exact time he is not certain, and that the said
Ann was a daughter of the said James Watson the Testator
but as to any inducement made use of by the said James the
Testator to bring about the said match, he knows of none
and on the contrary believes that from every information he
hath had since the death of the said Testator and not
till since, there never was any inducement. That as to the
several and various promises mentioned in the said Com-
plainants Bill, as being made at sundry different times
this defendant knows nothing but has the greatest
Reason to believe that none were ever made, because in
a conversation with the said Complainant Robert since
the death of the said Testator, this defendant inquired what
could be the Reason that such things were never talked
of in the family, but were kept a secret: to which the said
Complainant Robert answered that no body ever heard
the said Testator promise him any thing, and that he
had been inform'd of it by other people since the
death of the said Testator; and further from the said
Testators General Character being acknowledged to be that
of a man who was just and punctual in his dealings
and honest in the performance of his Contracts with
strangers, this defendant therefore cannot believe that
the said Testator would have acted in a different manner
with a daughter, to whom he shew'd the same respect
as a father that he did to his other daughters, That
as to the Value of what the said Complainant Received
in the lifetime of the said Testator, this defendant saith
that they Received a Negro fellow some stock and house-
hold furniture, but of what Value this defendant knows
not, that as to the uncommon influence that this defend-
ant had over the said Testator his Father, he denies that
he attempted any, unless a strict filial Obedience can be
call'd an uncommon Influence, that this defendant admits
it to be True, that he lived several years with the said Tes-
tator and had the care and management of his Estate

for which he received sums of money and some Tobacco
for his services, and the service of three of the defendants
own Negroes to what Value he knows not that with
Regard to this defendant, prevailing on the said Testator
when Childish to make his original Will, this defendant
denies, that he so far from directing never perswaded him
to make it in any particular Manner, but on the
Contrary, at the Request of the said Testator, this defendant
wrote Notes for his Original will to be drawn by John
Lewis attorney at Law, to write out the will, that the said
Will was drawn by the said Lewis, and Read to the said
Testator by him in the presence of this defendant the
said Notes being produced by the said Lewis, that on
Reading the said will this defendant discovered that in
one Clause the Testators meaning was misundestood
and Pointed out the true meaning, altho the words
were in favour of the said defendant as they were then
wrote but at his Request were altered, that as to any
alteration of the said Will afterwards, this defendant
conceives they were made in favour of the said Complain-
ant, and in Respect to the Child of the said Testator
Daughter Sarah, this defendant admits that the said
Testator had five Children at the time mention'd in the
said Will, that as to the Value of his Estate, this defendant
refers to his Inventory Return to this Court, that the
said Testator's Estate has been divided according to his
Will this defendant denies, all fraud and Combination
in the Will Charged without that, that any other
matter or thing in the said Complainant's Will con-
tained and not hereby sufficiently Confess'd or
avoided travers'd or denied, all which matters and
things are true to the knowledge and belief of this
Defendant: this defendant therefore prays to be hence
Dismiss'd with his Reasonable Costs and Charges in
this behalf most wrongfully sustain'd

Louisa^e Thewitthin answer
was sworn to before me this
13 day of April 1779

Waddy Thomson

James Watson