

Lousa county fe.

1784.005

To the worshipping his majesty's Justices
of the said county now sitting in chancery ~~themselves~~

Humbly complaining Your

Orator and Oratrix Robert mitch and Ann ^{his}
Wife sheweth unto your worships that some time in the year
One thousand seven hundred and fifty six ^{your orator}
and oratrix Being then unmarried that James Watson father to your
Oratrix in order to induce your orator to marry your oratrix
Did undertake and faithfully promise your orator and oratrix that
if your orator would marry your oratrix that he would give your
Oratrix an Equall part of his Estate ^{Real and personal} with his other children
and at other times promised your orator and oratrix that in
Case your orator and oratrix would marry that he would give your
Oratrix ^{Large} a part of his Estate Real and personal as he gave
to any one of his children and your orator and Oratrix depending
on the promises of the said ^{knowing he had been not the} James Watson soon after married
But to the great Surprise of your orator and Oratrix they
Received very little from the said James Watson at the highest
not more than the Value of Eighty pounds. But was informed
By the said James Watson that he intended to Retain the greatest
part of his Estate in his own possession During his life But would
give your oratrix an Equall part of his Estate Both Real and
personal at his Death But now so it is may it please your
worships that his Son James Watson the Defendant to this
Bill having an uncommon influence over his said father
prevails on him to give him several Sums of money and
several crops of Tobacco. and sundry other things amounting
^{To the value of}
~~in the whole to~~ five hundred pound current money

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And your orator and oratrix further shew unto your worshipps
that the said Deft. not contented with the several sums of money
I have &c. which he had Received prevails on the said James
Watson To make his Last will and Testament at a time when he was
very old and childish and notwithstanding he was possessed of an Estate
worth of ten or twelve thousand pounds he Devised the whole (a few
small Legacies Excepted) To the Deft. Who he appointed Executor
and the said James Watson Dying about the day of
one thousand seven hundred and ^{twenty five}
The said Deft. proved the said Will and ^{qualified} as Executor
your orator then applyed To the said Deft. in a friendly manner
and Desired him to ~~Deliver~~ Divide the said Estate agreeable to
the promise made to your orator and oratrix But now so it is
may it please your worshipps that the said Deft. combining and
confederating with sundry other persons at present unknown to your
worshipps ~~the said Deft. and the said persons~~ they have may be made Deft. to
this Bill with a purpose to charge them both altogether Refused to
Divide the said Estate agreeable to the said promise giving out
in speeches that the said James Watson made no such promise
at other times that your orator and oratrix had Received from
the said Watson a sum Equale to his said promise at other times
admitting the promise aforesaid and that your orator and oratrix
had not Received their said proportion of the said Estate ~~and~~ he ~~was~~ ^{was} ~~apprehended~~
apprehended the promise was not Binding and that though he
knew that your orator and oratrix in justice ought to Receive
a ~~substantial~~ ^{substantial} part of the said Estate Real and personal ~~and~~
Still he was Determined not to comply with the promises
of the said James Watson unless he was compelled thereto By
Law all which actions sayings and Doings of the said Deft.
are contrary to Equity and good conscience and manifestly
to injure your orator and oratrix To the End therefore
in as much as your orator and oratrix are ~~Deprived~~ ^{Deprived} By

That the Said Def^t ^{on his corporal oath.} may full true and perfect answer make
To all and singular The Questions and Interrogatories contained in
the premises as fully and particularly as if the same were
again repeated and interrogated and Discovers whether the
Said James Watson Def^t Did not promise your Orator and
Oratrix that in case your Orator would marry your Oratrix
that he would give your Oratrix an Equal part of his Estate
Real and personall How many children had the Said
Watson is not your Oratrix one of his children has your

Orator and Oratrix Received from the Said Watson more
than To the Value of Eighty Pounds or what other Value.

Did not he the Said Def^t Receive from the Said Watson since the
marriage of your Orator and Oratrix several Sums of money
Crops of Tobs and other Things and of What Value were they

Did not the Said Watson - ^{in his last Will & Testament} leave

a considerable Estate and of what Did it consist In whose possession
is the Said Estate and your Orator and Oratrix pray that

By a Decree of this worshipfull Court the Def^t may Be com-

compelled to pay them a ^{Child} part of the Value of the personall

Estate and that proper Commissioners may Be appointed to

^{and app^r to your Orator and Oratrix then met} Divide the Land and Slaves, and that your Orator and Oratrix

may also Recover a Reasonable Sum for the Use of the Said

Heirs and the Rents and profits of the Said Lands since they

Came into the possession of the Said Def^t and that your

Orator and Oratrix may have such further and other Relief

as is most agreeable to Equity and good conscience may it

please your worship to grant to your Orator and

Oratrix his majestys most gracious writ of Supena &c

Walker for the Comptrol