Berkshire ss. The 9th Term 1811

Brom & Bet
v.
Jno. Ashley Esq.} Domine Replegiando

And now the said John Ashley comes & says that the said Brom and Bet ought not to have and maintain their ~~Suit~~ aforesaid against him but that the same ought to be abated and dismissed, because he says that the said Brom & Bet are, and were at the time of suing the original Writ ~~for the Term of twenty years last past have been and that ever of them have been~~ the legal negro servants of him the said John Ashley ~~this Term~~ during their Lives, and this ~~Servants for life~~. he is ready to verify, whereof he prays the Judgment of this Court & that the said suit may be abated.

Nathl Hanfield for said John

And the said Brom & Bet say that their Suit aforesaid ought not to be abated because they say ~~that they~~ that they are not nor are either of them, nor were they or either of them at the time of the suing of the original Writ the negro servants of him the said John Ashley during their Lives, & this they pray may be inquired of by the Country. p.d Brown & Sedgwick

and the d. John likewise

Nathl Hanfield for said John

No. 1.

Brom & Bett vs Ashley

Aug.t 1701.