

To the Honorable John. F. May Judge of the Superior Court of Law & chancery for the County of Sussex

Humbly complaining sheweth to your Honor your Oratrix Jane—a free colored person.

That Edwin Lanier decd. by his last Will and Testament—duly recorded in Sussex County Court—an attested Copy of which is hereunto annexed as a part of this Bill of Complaint Markt A manumitted your oratrix—That he left an ample Estate both real & personal for the paymen of his debts: & That in the Year 1831 the Admor: with the Will annexed assented to your oratrix being free & had a copy of the Will made out with all the proper & Legal Certificates annexed thereto to enable your oratrix to enjoy her freedom any & every where in consonance to the Laws of the community in which her fate might be cast. She refers for greater certainty to the Certificates annexed to the Copy of the Will aforesd.

That Cobbs has obtained a Judgment in Sussex County Court—and also— Lanier has very lately issued executions agt. your oratrix & placed them in the hands of the Sergt. of Petersburg who has levied these on your oratrix, & she is now in Jail. That your oratrix: is advised that she is not liable—till there be a total failure of assets to pay the debts; nor is she then liable, except made so by a decree of acount of a Court of Chancery, in as much as your oratrix received the assent of the exor: to the Enjoyment of her liberty. In corrolation of the aforesaid documents your oratrix—refers to another copy of the Will of her deceased Master Edwin Lanier—with the Certificate of the Admor. markt B.—leaving his Willingness for your oratrix to Enjoy the Boon bestowed on her by her deceased Master. That the proceedings agt. your oratrix are harsh & oppressive & unquestionably premature & contrary to the Principles of Equity & Justice. To the end therefore that your Honor will compel Thomas Hunt, late Sheriff of Sussex County, to whom administration on the estate of Edwin Lanier was—Jeremiah Cobb exor of Benjamin Cobb Decd who was exor of James Sebrill who sues for the benefit of James G. Withers, & Lewis Lanier, to answer the foregoing allegations fully & truly. & that the said Hunt may specially State whether assets more than Sufficent to pay the debts of Edwin Lanier did not come to his hands to be administered and whether assent was not given to your oratrix, under an impression exciting at the time that the estate—exclusive of your oratrix was able to pay all the debts. & that Jeremiah Cobb exor of Benjamin Cobb Decd who was exor of James Sebrill who sues for the benefit of James G. Withers, and Lewis Lanier, may state whether they were not advised that your oratrix was not liable for their debts, at the time they placed their executions in the hands of the Sergt. of Petersburg. May it please, your Honor, should it be deemed proper & necessary, to allow your oratrix to make new parties to this Bill. May it please your Honor to Injoin all proceedings in the executions, by which your oratrix is seized & is now confined in Jail—“till the matters & things are fully heard & determined in Equity. May it please your Honor, the premises Considered to grant to your oratrix such other & further relief as may be consistent with Equity & Justice as her care may require.

May it please the Court &c.

"Jane (a free Woman of Color) vs Hunt & others. Bill of complaint &c for an Injunction." N.d. Manuscript. Petersburg City (Va.) Chancery Causes, 1803-1960. Jane v. Admr of Edwin Lanier etc, 1840-066. Local Government Records Collection, Petersburg City Court Records, The Library of Virginia. 730-1840-066-0004 thru 0006

Cobb's

#.6.5.2

Cobb's Debt. Six pounds, five shillings and two pence with interest thereon to be computed after the rate of six percentum perannum from the 9th day of November 1812 till payment—and the costs \$7.14\$.

Lanier's Debt- seventy dollars with interest therein to be computed after the rate of six percentum perannum from the 31st day of December 1828 till payment—& the costs \$6.64\$

[*endorsed on reverse*]

Allison

Jane (a Free Woman of color)

vs

Hunt & others

Bill of Complaint &c. for an Injunction