

To the Honorable John B. 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
Coloured person. That Edwin Lanier ^{deceased}
his last Will & Testament - ^{deedly records}
in Sussex County Court - ^{an attested Copy of}
which ^{is hereunto annexed as a part}
of this Bill of Complaint ^{with} ^{an} ^{annexed}
your Oratrix. That he left an ample
Estate both real & personal for the payment
of his debts. & That in the Year 1831. then
Admiror with the Will annexed applied
to your Oratrix being free & had also
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 Conso-
nance to the Laws of the Commonwealth
in which her fate might be cast. She refers
for greater certainty to the Certificates
annexed to the Copy of the Will aforesaid.
That ^W Cobbs has obtained a Judgment
in Sussex County Court - and also - ^{Lanier}
issued execution ag^t your Oratrix

placed them in the hands of the Sheriff
of Petersburg who has leased them
on your oration. She is now in jail
that your oration is advised that she is
not left till there be a total fail-
-ure ^{of paper} to pay the debts; nor is she then
liberated, except made so by a decree of
account of a court of chancery, in as much
as your oration rescinds the appeal of
the said to the enjoyment of her
liberty. In corroboration of the ^{affidavit} documents
your oration refers to another ^{copy} of the
Will of her deceased Master Edwin
Lanier - with the Certificate of the
Adm^r ^{Mark B.} showing his Will purports for
your oration to enjoy the Poor bestowed
on her by her deceased Master. That the
proceedings of your oration are harsh
oppressive & ^{unquestionably} contrary
to the Principles of Equity & Justice.
I therefore that your Honor
will compel Thomas Hunt, late
Sheriff of Tappan County, to whom a ^{mini-}
-stration on the estate of ^{Edwin Lanier was}
I Jeremiah Holt's copy of Benjamin Holt's Deed ^{of James}
Holt introduced for the benefit of James G. Williams & Lewis Lanier
to answer the foregoing allegations
fully & truly & that the said Hunt

may especially state whether assets more
than sufficient to pay the debts
of Edwin Lanier did not come
~~to~~ to his hands to be administered
and whether assets were not given
to your oratrix, under an impression
existing at the time that the estate
exclusive of your oratrix was able
to pay all the debts of that Jeremiah Holt
son of Benjamin Holt (see volume of James Sebell who sued for
the benefit of James G. Wilcox 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 Sheriff of Petersburg.
May it please your Honor, should
it be deemed proper & necessary, to
allow your oratrix to make responses
to this Bill. May it please your
Honor to Enjoin all proceedings
in the executions, by which your
oratrix is seized & is now confined
in Jail. Till the Matters of the Bill
are fully heard & determined in Equity.
May it please your Honor, the premises Consider
to your oratrix Substantive & further
relief arising inconsistent with the Equity & Justice
of her Case may require
May it please the Court &c.

Edwin Lanier
Jane (a Free Woman of Color)
Hunt & others
Bill of Complaint &c
for an Injunction

Edw. Lanier
 do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears from the original in my possession and control this 10th day of December 1840.

Edw. Lanier
 do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears from the original in my possession and control this 10th day of December 1840.