

To the Honble the Judge of the Circuit Superior Court of Law & chancery for the Town of Petersburg in chancery sitting—The answer of Thomas Hunt late sheriff of Sussex & in that character administrator with the will annexed of Edwin Lanier decd.—to the bill of

Complaint exhibited agst him & others by Jane a free coloured person—This Defendt. saving &c. for answer &c. saith, that he assented to the freedom of the sd. complainant, as he thought, in obedience to the requisitions of law. That is his deputy Jesse Hargrave did so for him. That this defendt knows & knew of the matter only what his said deputy represents to him: He was the High sheriff at the time the Estate of sd. Lanier was committed to him: & the sd. Hargrave had undertaken to perform (with others) the duty of Sheriff. That upon sd. Hargrave in conformity with that undertaking devolved the duty of administering the sd. Lanier's estate with the will of sd. Lanier decd. annexed. This deft represents that it is not true that there was estate which came to his hand sufficient to pay all the debts without requiring something to be paid by the plaintiff, as his accounts will show: This deft. had no right to interfere with the lands or to dispose of the plaintiff. This deft. represents that his account current has been fully settled up & he now has nothing in his hands or subject to his control belonging to the estate nor is there any thing that he knows of out of which to pay the judgmt against him in favour of Lewis Lanier & that in favour of Cobbs' exr. for Jas. G. Withers—executions upon which the plaintiff alleges have been levied upon her. This deft. had nothing where with to pay the sume & refers your Honor to a copy of his account current recorded in Sussex a copy of which will in due time be filed—for proof of that fact.—This deft. assented to the freedom of the plaintiff believing that there would be assets sufficient to pay the debts of the estate—But it turns out that there is a deficiency.—This deft. having thus answered prays to be hence dismissd. &c.

Sussex County, to wit:

Jesse Hargrave Deputy of Thos. Hunt late Sheriff & admr. with the will annexed of Edwin Lanier decd.—this day personally appeared before me a justice of the peace in the County aforsd. & made oath that he as Deputy of the sd. Hunt took charge of sd. estate & had the entire management thereof for sd. Hunt, & acted as the admr. with the will annexed. That he believes sd. Hunt has no knowledge of the business except what information he gave him. That the foregoing answer contains the truth to the best of this defendt's knowledge & belief.

Given under my hand this 10th day of June 1836.

Cyrus Dillard (J.P.)