

The Answer of Samuel Beale and Rebecca his wife calls
Rebecca Complainant to the Bill of Complaint of Thomas Oakley &
Elizabeth Oakley exhibited against them & others in the Superior
Court of Chancery holden at Fredericksburg - These respondents
saving and reserving to themselves the benefit of all proper
exceptions to the many contents & other imperfections in said
bill for answer thereto, or so much thereof as they are
advised is material for them to answer, ~~thereby~~ the
said Samuel Beale says, that he has never nor has his
wife been a non resident of the State of Virginia. When
he left the County of Orange he went to the City of Richmond
where he resided for some time, & from thence he removed
to the County of Rockingham, in which County & the
County of Augusta he has ever since resided. Now the
Complainants could have supposed they had removed to
the Western County beyond the limits of the State, he
is unable to say, and he is unwilling to believe that
the Complainants were really under that impression.

As to so much of the bill as prays an adjustment of
the pretended claims agt the Respondent Samuel Beale
therefore, he prays that the alleged may be dismissed for
~~that~~ want of jurisdiction, and he hopes that
he will have the benefit of this plea in this way
as well as if so much of the bill were regularly
demanded to - The Respondent Samuel will however
further state for the satisfaction of your honors, that
he does not owe the male Complainant one cent
on account of the claims stated in his bill, and he
will briefly notice them & give his reasons for this
assertion - As to the first claim ~~for~~ it owned as follows

This respondent has hired a negro girl of Pope Clayton
and the Complainant that Oley joined him in a note for
the hire, but the said Complainant with the consent of this
respondent returned the girl & enjoyed all her services &
agreed to pay the hire - so in fact he was by this
arrangement the principal & he alone was accountable
for the hire - The 2^d claim your respondent believes was
a recovery against Oley the complainant for a trespass
committed on the property of H. H. H. If this he is not certain
but he is positive that it was not paid by Complainant
as security for this respondent. He has understood that
a writ of some kind was instituted by H. H. H. against Complainant
for some alleged misconduct, but in that matter
this respondent has no concern whatever. As to the
3^d claim let up against this respondent, he says that said
Oley was his County, but when this respondent left
the County of Hargrave, he left in the hands of the complainant
sundry claims to collect in order to pay this debt. These
claims were believed to be good & of sufficient amount to
satisfy it. He never heard any ^{altho he has seen 3^d Comptt line} complaint on this score,
and must believe that they claims were collected, and
that the Complainant was perfectly satisfied until he
conceived the idea of taking advantage of your respondent's
alleged non-residence. As to the 4th & 5th claims let up
by Complainant, this respondent can only say that he
knows nothing of them - nor does he believe they have
any foundation in truth. ~~These respondents~~ ^{admitted}
the statements in the bill, as to the death of John
Commons the father of the female respondent, and
of the estate left by him - but they are unapprised of

what, has been done since the death of said John Ammon except some money they have heard which are by no means flattering. If there is any thing left for division they can have no objection to receiving their portion be it ever so small, but they must add that they cannot think that a partition of the estate forms any part of the object which the Complainants had in view in filing their bill. These respondents having answered to far as they are advised is material may to be hence dismissed with their costs &c

Augusta County, to wit:

This day Samuel Beale made oath before me a justice of the peace for said County that the facts stated in the foregoing answer are true & that ~~any~~ ^{stated} thing else thereon he believes to be true. Given under my hand this 22^d July, 1830.

Jno. W. May

Sam^e Beale wife
ad 3 answer
Oxley wife

Oxley
to 3 Mr. Fr.
Emison 3 of
Sam^e Beale

Feb^y. 25th 1830.

Frederick Henry
to

at

The Clerk of the Superior Court of Albany

PAID



Stoughton in
July 22-1830