

M Carolina
in Equity

To the Honorable Richard Anderson Esq. Master and
Judge of the Court of Equity
of the W. of North Carolina

In obedience to a writ of subpoena to him directed Alexander Rose the depts
and in this cause humbly submits the following facts in answer to the Bill of
Complainant filed against him in your Honorable Court by Edward Brien.
But being unable without being disturbed in the way of his & wife's
he has met with to the Council to carry on his defence, He must humbly beg

the writ formalities and that no charge of contempt or disrespect towards you
honor or the Court of Equity may impute to him - promising
also that no course is intended or intended by the defendant to the complainant
whichever nor to the trustee in equity for him conduct respectively but which as
the Defendant is required to declare he trusts upon oath he can neither conceal
nor suppress

The said Defendant has long since for his such mortgage proceeds to
make known to your Honors that so long ago as the 1st day of February
1775 the Defendant called the Dr. Fulling in Christ Church Parish to and
divided in the Complainant's bill was with sundry Negroes mortgage by the Defendant to
the Plaintiff do not but to Robert M. J. Anderson money lent for the sum

of 3097-10/100 which was paid to the Plaintiff's record & related in the margin herewith
and after the death of M. J. Newton the Defendant's credit was so far with said
M. J. Newton that he had liberty to call the Plaintiff on condition that the money was
and such debt should be of paid in discharge of said. As an account of the bill
and to the fact for the purpose of carrying on the Dr. Fulling business and his Defendant
to pay and other herein. I was afterwards told by them to James Neilson as stated in
the Bill of Complainant, who had he paid for it the money would have been applied

Office DDD July 1792