

To the Worshipful Court of Prince Edward County, in Chancery,
humbly complaining, shew unto your Honors, Your Orators and Petitioners, ~~Isaac~~
~~Goodson late Sheriff of Prince Edward and Adm of Asa Colley deceased~~
Isaac Colley in his individual capacity ex adm of Asa Colley deceased, Elizabeth Colley widow of Wm Colley deceased
Sally Colley late wife of Asa Colley deceased, and her next of kin, James Colley and Sally Colley late wife of Asa Colley deceased
and Isaac Colley, Asa Colley, and Nancy Colley, that some time in the year
Valentine Colley departed this life certain estate, that two negroes Daniel and
Frank descended by the death of said Valentine to Asa Colley deceased, that
only one of the negroes, Daniel, has been delivered to the heirs of Asa Colley deceased
that the other Frank has never been delivered, neither to Asa Colley deceased before
his death, nor to his heirs or representatives since, that Daniel was delivered
to the representatives of Asa Colley since the death of Asa Colley deceased by
William Colley, that the said William, at the time of the said negro Daniel,
acknowledged that the negro Frank was also the property of Asa Colley his
brother who was then dead, and offered to buy the said negro Frank of
Sally Colley widow of said Asa Colley deceased, that the said Sally Colley
widow of said Asa deceased her husband having departed this only a few
months before that and shortly after the death of said Valentine and the
division of his Valentine's estate by which the two negroes aforesaid fell to
said Asa deceased, entered into a contract with the said William by which
she sold the said negro Frank to the said William, the said William being fully
apprised and having certain knowledge that the said negro Frank was
not the property of the said Sally Colley but the property of the said
said Asa Colley who had died shortly before, leaving no will, her deceased
husband and that the said Sally had no right or authority to dispose of
the said negro Frank that the said William under the pretence of the
purchase of the said negro Frank from the said Sally took possession
of the said negro Frank and has held possession of him ever since
(being on the day of _____ in the year 18__) the time of the purchase
did purchase from the said Sally the said William has refused to pay
for the said negro Frank the money agreed to be paid, by said pretended
purchase, with the said Sally because of his knowledge that the sale
and purchase was illegal and fraudulent and very oppressive on
the heirs of the said Asa deceased, that the said Asa deceased leaves
your Orators and Petitioners left the following representatives, Sally Colley
his widow, & the following children Edmund, Nancy, Isaac, Wm (since dead