

him as his own property in opposition to not only
to the claim of the complainants, but to every other person
or persons what so ever - This Respondt. ~~was~~ claims the
said Frank as his own property under the Will of the said
Valentine Colly a copy of which is herewith filed as a
part of this Answer, in which will the following
clause is to be found "My will and decree is that
"the increase from this time until the death of my
"Wife of any from Pully, Rose & Sarah shall be equally
"divided between my three Sons namely Colly, William
"Colly and Asa Colly except the first one that is born
"of any I give to my Son William & Tronary"

This Respondt. saith that he is the same William
mentioned in the above clause of said Will
and that the said Negro Frank is the son of
the Negro Sarah mentioned also in said clause
and that he is the first ^{increase} ~~child~~ of the said
Pully, Rose & Sarah, ^{and that he was born in the life time of the Wife of the Testator} and of course given by
the said clause to be him this Respondt. -

This Respondt. further answering
saith that he purchased on the 24th of Janry 1803
for valuable consideration of said Asa Colly
all his interest in the estate of the said Valentine
as will more fully appear by reference to a
conveyance executed to him on that day by
the said Asa which is also herewith filed
as a part of this Answer, This Respondt. claims

every benefit resulting to him in this suit by
the said purchase and did he consider it necessary
should rely upon that conveyance as ~~conveyance~~
conclusive against the complainants claim -

That by the said Will of Valentine Colly your
Respondt. was at liberty to retain in his possession
the said Sarah (mother of Frank as afd) until the Testator's
decease grand daughter Sally Brown arrived at lawful
age who he died; that whilst the said Sarah
was thus in possession of your Respondt. the said
Frank was born, that when the said ~~Sarah~~
Sally Brown arrived to the age of twenty one years
he deeded her over to the said Sally and her
husband John Pigg retaining the said Frank
as his property under the will afd. That the
said Frank has been in his possession ever
since, and as he is advised rightfully

This Respondt. having fully
answered the complainants bill prays to be
there dismissed, and as in duty bound
will ever pray &c -

Wm. Colly
X Colly
maker