

Nathaniel Shepard

ad

Joseph Clark assignee
of Charles Bridge

And the said Joseph saith that he by any
thing by the said Nathaniel in the first
plea of the said Nathaniel alleged ought
not to be precluded from having his execution
of the debt and damages aforesaid against her
the said Nathaniel of the Lands and
Tenements aforesaid in the return of the

Writ of Scire Facias aforesaid mentioned whereof she is returned Tenant
to be precluded ought not, because he saith that the plea aforesaid
by the said Nathaniel in manner and form aforesaid above
pleaded and the matter in the same contained are not sufficient
in Law to preclude him the said Joseph from having his execution
of the debt and damages aforesaid against ~~the~~ the said Nathaniel
of the Lands and tenements aforesaid in the return of the Writ of
Scire Facias aforesaid mentioned whereof she is returned Tenant and
to which said Plea in manner and form aforesaid above pleaded
he the said Joseph hath no necessity nor by the Law of the Land
is obliged in any manner to answer and this he is ready to verify
He therefore for want of sufficient Plea in this behalf the said Joseph
prays Judgment and Execution of the Debt and damages aforesaid
against ~~the~~ the said Nathaniel of the Lands and tenements
aforesaid in the return of the Writ of Scire Facias aforesaid men-
tioned whereof she is returned Tenant to him to be adjudged and so forth.

And the said Joseph saith that by reason of any thing by the said
Nathaniel in the second plea of the said Nathaniel
above pleaded he the said Joseph from having his Execution of
the debt and damages aforesaid against ~~the~~ the said Nathaniel
of the Lands and Tenements aforesaid in the return of the Writ of
Scire Facias aforesaid mentioned whereof she is returned Tenant to
be precluded ought not because he saith that there is such
Record of the recovery of the debt and damages aforesaid as he the
said