Zebulun, it was read by him wrong to her by omitting many Passages therein inserted by him that were not read unto her. Your Libellants likewise alledge and intend to prove, that altho' the said Mary the Intestate put her mark to the said writing by the means and Instigation of the said Zebulun that she never did Sign Seal Publish and declare the same to be her last Will and Testament according to the form of the Statute in that Case made and provided. And Your Libellants likewise alledge and intend to prove that when the Intestate was made acquainted with the Contents of the said writing, and that by Surprize she had put her mark to the same she desired to have the same altered and that the said Zebulon was thereby appointed her Executor, And that the Legacys aforesaid were left to him she wanted very much and desired to have the same altered, he the said Zebulon made Answer that he could not Interline it or rase out any words out of the Will, for it would be good for nothing, or words to that Effect and that it was too late to be altered — To the end therefore that the said Zebulon Freene may upon his Corporal Oath, Answer, whether the Pretended Will or writing afs.d is not all of his own hand writing And that Your Orator may have the Subscribing Witnesses to the afs.d writing, and others then present Examined in order to Suppress the said writing as fraudulent false and Erronious May it please Your Honour to Grant unto Your Honour his Lordships writt of Subpoena to be directed to the said Zebulon thereby Commanding him at a certain day and under a certain pain therein to be Inserted Personally to be and appear before Your Honour in this Honourable Court, then and there to stand and abide such order and decree therein As to Your Honour shall seem meet agreeable to Equity and good Conscience. And Your Orator shall pray &c.

William Cumming } Libellant

Whereupon the said Libellant hath his Lordships writ of Citation to her Granted directed to the Sheriff of Dorchester County Commanding him to Cite and Summons the said Zebulon Freene that he be and appear &c to Answer the Premises aforesaid, Returnable to the Second Tuesday of September then next

At which said Second Tuesday of September being the

Eleventh day of the same Month Anno Domini 1750 and the day of the return of the Precept afs.d came again the said Libellant by her Procurator afs.d and the Sheriff of Dorchester County afs.d to whom the same was directed likewise comes and makes return thereof Endorst.

To the Judge within mentioned, I humbly certifie that I have Cited & Summoned Zebulon Freene within mentioned as by the within Summons I am Commanded — So Answers

B E Smalls Sher Dor Co.ty

Whereupon the said Zebulon Freene by Edward Dorsey his Procurator appears and having filed his Answer to the Libel and Complaint aforesaid, the same is received and follows in these words Viz.t

The Answer of Zebulon Freene of Dorchester County Planter to the Libell and Complaint of Mary Freene of Dorchester County Widow on the behalf of herself and Henry Freene and Infant Libellant

This Respondent now and at all times hereafter saving and Reserving to himself all benefit of Exception to the many ~~untruths~~ uncertainties and Insufficiences in the Libellants said Libell Contained, for Answer thereunto saith, that Mary Freene deceased in the Libellants said Libell mentioned died on or about the time in the Libell set forth possessed of three Negroes and Household furniture Stock and other things, but what was the value of the same, this Respondent cannot say. And this Respondent further saith that the said Mary Freene deceased at the time of her Death left William Freene of Dorchester County her only Son who since the Decease of the said Mary is also Dead, and this Respondent further saith that on or about the Twenty fifth day of January last the said Mary Freene deceased in the Libellants said Libell mentioned while she lay in her last Sickness sent for this Respondent to come from his House to the House of the said Mary Freene, and when this Respondent was come to the House of the said Mary Freene she told him this Respondent that she wanted to leave her Negroes, so as they might be Secured to her Grand Children Henry Freene and Molly Freene, the Children of her Son William Freene when they came to age, for that her Son William Freene was a very Extravagant drunken Man and that if she left them to him or in his possession her Grand Children would never be the better for them and offered to give her Negroes to this