And Samuel then and there refused to accept and this he is ready to verify and so forth wherefore he prays judgment if the aforesaid Thomas Ringgold and Samuel their Action aforesaid against him to have or maintain ought and so forth

And the aforesaid William with the leave aforesaid according to the form of the Statute aforesaid defends the force and Injury when and so forth and saith that the aforesaid Thomas Ringgold and Samuel their Action aforesaid against him to have or maintain ought not because as to eight hundred and thirty five Pounds sixteen shillings and one penny Sterling part of the aforesaid two thousand four hundred and seventy nine Pounds Sterling in the Condition aforesaid above mentioned he the said William saith that he the said William and the aforesaid John Cannon before the aforesaid twenty fifth day of September in the Indorsement aforesaid above mentioned did pay to them the said Thomas Ringgold and Samuel the sum of twelve hundred and ninety five Pounds ten shillings Gold Currency at fifty five per Cent to wit on the twenty fourth day of September seventeen hundred and sixty at Baltimore County aforesaid and this he is ready to verify and so forth

And as to the whole Residue of the said two thousand four hundred and seventy nine Pounds Sterling in the Condition aforesaid mentioned the same William saith that he the said William and the aforesaid John Cannon in and upon the aforesaid twenty fifth day of September in the Indorsement aforesaid above mentioned at the Dwelling House of the aforesaid Samuel were ready from the rising until the setting of the Sun on the same day and in the same day did there offer to pay to the aforesaid Thomas Ringgold and Samuel the sum of two thousand five hundred and forty six Pounds thirteen shillings and three pence Gold Currency to wit at Baltimore County aforesaid and that neither the said Samuel nor the aforesaid Thomas nor any other person on their part was there ready to receive the same and this the said William is ready to verify and so forth Wherefore he prays Judgment if the aforesaid Thomas Ringgold and Samuel their Action aforesaid against him to have or Maintain ought and so forth

And the said Thomas and Samuel as to the first plea of the said William above pleaded say that they by any thing in the same first plea alledged from having and maintaining their Action aforesaid to be precluded ought

not

not because they say that the aforesaid William and the said John Cannon did not pay unto them the said Thomas and Samuel the aforesaid sum of two thousand four hundred and seventy nine Pounds Sterling with legal Interest for the same in manner and form as the aforesaid William above in his said first plea hath alledged and this they pray may be enquired of by the Country and the aforesaid William in like manner and so forth. And as to the second plea of him the said William as to the sum of eight hundred and thirty five Pounds sixteen shillings and one penny Sterling part of the aforesaid sum of two thousand four hundred and seventy nine Pounds Sterling in the Condition aforesaid above mentioned the said Thomas and Samuel protesting that the said second plea as to the said sum of eight hundred and thirty five Pounds sixteen shillings and one penny Sterling in manner and form aforesaid above pleaded and the matter therein contained are insufficient in Law for them the said Thomas and Samuel to make answer unto for plea Nevertheless the said Thomas and Samuel by way of replying say they cannot gainsay but that the said William paid to them the said Thomas and Samuel the aforesaid sum of eight hundred and thirty five Pounds sixteen shillings and one penny Sterling part of the said sum of two thousand four hundred and seventy nine Pounds Sterling before the twenty fifth Day of September in the plea aforesaid of him the said William mentioned in manner and form as the said William above in his said second plea hath alledged And as to the second plea of him the said William as to the residue of the aforesaid sum of two thousand four hundred and seventy nine Pounds Sterling the said Thomas and Samuel say that they by any thing in the said second plea as to the residue of the aforesaid sum of two thousand four hundred and seventy nine Pounds Sterling above alledged from having and maintaining their Action aforesaid against him the said William to be precluded ought not because protesting that the plea aforesaid as to the Residue of the said sum of two thousand four hundred and seventy nine Pounds Sterling in manner and form aforesaid pleaded and the matter in the same contained are insufficient in Law for the said Thomas and Samuel to make answer unto protesting also that the said Thomas and Samuel did not before the twenty fifth day of September in the plea last aforesaid of him the said William mentioned refuse to accept of and from him the said William the residue of the aforesaid sum of two thousand four hundred and seventy nine Pounds Sterling for plea Nevertheless the said Thomas and Samuel by way

for