To the worshipful Justices of the County of Fluvanna, sitting in Chancery.

The Answer of David Ross, defendant, to the Bill of Duncan McLauchlan, Complainant.

This defendant, saving & reserving to himself, now & at all times hereafter all manner of benefit & advantages of exception to the many false allegations, errors & deceptions in the said bill of complaint contained ... in answer thereto or unto so much thereof as he is advised materially concerns him to answer unto. He answereth & saith...

That as well as he can recollect, the Complainant was, in the year 1780 or 1781 introduced to him by Colo. Thomas Napier at the Point of Fork, requesting this defendants good offices, to get the Complainant into some sort of business, as he, the Defendant, was then carrying on an extensive business at Richmond & also at Petersburg, where he himself then resided. Upon enquiry, this defendant was informed; that the complainant was unacquainted with any other business than that of a Schoolmaster, upon which he candidly declared that he had no use at that time for a schoolmaster and could render him no service ... & thus the matter ended. At a subsequent meeting of his neighbours at the same place some months afterwards, the Complainant again appeared with the said Colo. Napier & others of his friends, who again solicited the defendant in his favour, to which he returned the same reply as before. They then proceeded ...