

To the Honorable John Brown judge of the Superior  
Court of Chancery holder at ~~the~~ Court house  
The Bill of Complaint of <sup>your orator & oratrix</sup> Henry Under and Magdalen  
his wife late Magdalen Staley humbly sheweth that  
Abraham Staley of the County of Wythe being seized  
and possessed of a considerable real and personal  
estate <sup>in the County of Wythe</sup> in the year 1809 departed this life intestate  
and letters of administration of the <sup>estate of the</sup> ~~said~~ said Abraham  
Staley deceased was granted by the County Court of Wythe  
unto Barbara Staley widow of the said Abraham and to Jacob  
Staley his son. who entered into bond with one Leonard  
Straw and Henry Ruddle their securities for the due  
administration of the estate of the said Abraham Staley  
deceased. a copy of which bond is here with exhibited  
and prayed to be taken and considered as part of  
this Bill, your orator and oratrix would further shew  
that all the business relative to the personal estate  
of the said Abraham Staley <sup>decd.</sup> was conducted by Jacob Staley the Administrator of  
he having taken possession of the same, and sold and  
received all the monies arising from the sales except  
about six dollars that was recd. by the Administrator  
Barbara Staley, your orator & oratrix charges that there  
was not a full <sup>and perfect</sup> true inventory made of the  
whole personal estate <sup>of the said Abraham Staley decd.</sup> neither was it all sold as required  
by law, from a settlement made with the said ~~Admini~~ Admini  
strator & administrator by ~~the~~ ~~County~~ John Stanger  
and Leonard Straw Commissioners appointed by ~~the~~ ~~County~~ ~~Court~~  
<sup>a which settlement is here with exhibited and prayed to be taken as part of this bill</sup>  
County Court to settle the Administration account, it

hands of the said Administrators, the sum of \$496.36 <sup>cents</sup>  
out of which they claim credits to the amount of \$121.33 <sup>cents</sup>  
exclusive of \$24.81 cents allowed by Wythe County Court as a  
compensation to them for their trouble, which would leave  
according to said settlement the sum of \$350.52 <sup>cents</sup>  
in the hands of the said Administrators and, which they  
have <sup>held ever since the year 1809 and</sup> failed to pay out according to law your orator

& Coatrix would further shew that the said Abraham  
Staley at his death was owing no debts except  
one, and that was a debt of \$13. due to Major Daniel  
Sheffey and which your orator Henry, paid to the  
said Sheffey, and which was to be repunded to him out  
of the estate of the said Abraham Staley dec'd. your  
orator would shew that the said <sup>Barbara Staley his widow and</sup> Abram Staley left the

following children and heirs who are intitled to a  
distribution of the personal estate of the said Abraham  
Staley deceased: To wit ~~Barbara Staley his widow and~~  
Peter Kinder who intermarried with Mary Staley daughter to  
the said Abraham, Christian Kinder who intermarried  
with Rosanna another daughter of said Abraham,

Michael Rodgett who intermarried with Barbara  
Staley another daughter of the said Abraham. & your  
orator Henry who intermarried with your oratrix  
Magdalen another daughter of the said Abraham, also  
Jacob Staley, Abraham Staley & Christina Staley  
children of the said Abraham Staley deceased. your orator  
and oratrix would further state that the said Jacob  
Staley <sup>still</sup> who was the administrator of the said Abraham  
Staley <sup>dec'd</sup> after receiving all the monies arising from  
the sale of the personal estate left this Country about  
the year 1812. and about the year 1814 departed the

Indian nation leaving no personal estate known of  
to your Orator and Oratrix and without having paid  
to your Orator & Oratrix that portion of the personal estate  
of the said Abraham Staley <sup>dec'd</sup> to which they were intitled  
by <sup>and no person hath administered</sup> ~~law~~ <sup>of the estate of the said Jacob Staley dec'd.</sup>  
your Orator & Oratrix would further shew  
that he has purchased of Peter Kinder, & Christian  
Kinder, who intermarried with Mary, & Rosanna Staley's  
daughters of the said Abraham Staley dec'd. and of Christina  
Staley daughter of the said Abraham Staley <sup>dec'd</sup> all their  
claim and interest in and to the personal estate of  
the said Abraham Staley dec'd and transfers for  
which ~~are~~ here with exhibited marked A. B. & C.  
and which your Orator prays may be taken and  
considered as part of this Bill, <sup>so that</sup> your Orator & Oratrix  
~~would further shew~~ <sup>parts</sup> have a claim, and right to, four  
sevenths, of the personal estate of the said Abraham  
Staley dec'd, after the widow has rec'd. her dower therein.  
your Orator & Oratrix would further shew that  
the said Jacob Staley administrator as aforesaid  
~~and since~~ ~~at~~ ~~his~~ ~~death~~ ~~claimed~~ ~~title~~  
to two tracts of Land lying and being in the County  
of W. the one containing 125 acres a patent for  
which issued to him in his own name and the other  
tract was purchased from Ben Boyd and  
contains <sup>about</sup> 350 acres. your Orator and Oratrix would  
further shew <sup>that</sup> ~~left~~ Jacob Staley dec'd left a wife and  
and seven children, who are living upon the two tracts  
of Land above <sup>mentioned</sup> ~~described~~ ~~and~~ ~~who~~

Polly Staley, Benjamin Staley, Psetrey Staley, Rachel Staley,  
Abraham Staley, Reubin Staley, and John Staley, the last four  
of whom are Infants under twenty one years of age,  
and in <sup>all</sup> whom the title to the said tracts of Land have  
vested your Orator & Oratrix would further shew  
that Thomas Vaden surviving partner of the late  
firm of Hobson & Vaden and Abraham Steffy,

have brought a suit in this Honorable Court  
against the heirs of the said Jacob Staley, <sup>decd.</sup> to  
subject the real estate of the said Jacob Staley  
deceased to sale to pay a debt owing to them. And

also a certain Zachariah Brooks has brought  
another suit against the said ~~for~~ heirs of  
the said Jacob Staley deceased for the ~~same purpose~~  
<sup>of subjecting the real estate to sale to pay a debt to him</sup>

The bills in which cases and the exhibits  
therein alluded to, your Orator and Oratrix pray  
may be taken and considered as part of this Bill  
your Orator & Oratrix, conceives as Jacob Staley  
deceased Administrator of Abraham Staley deceased

received all the personal estate of the said Abra-  
ham Staley decd. and applied <sup>it</sup> to his own use  
instead of paying <sup>it</sup> over to the distributees, as he  
ought to have <sup>done</sup> And as he has given her bond with  
~~Security~~ in which he binds himself and his heirs

for due administration of <sup>ing</sup> pay<sup>ing</sup> over of the said estate to those  
intitled thereto, that in justice his Lands ought to be  
subjected to the payment of your Orator & Oratrix claim  
<sup>with Interest</sup> against his estate, And if your <sup>Orators</sup> Oratrix's claims have  
not a preference in law to the claims set up  
by Thomas Vaden surviving partner of Abraham

of the said Jacob Staley deceased then & in  
that case your orator prays that your orator &  
oratrix may be permitted to join with the said  
Thomas Vaden surviving partner de Ansd Abram Stef  
fy. & with Zachariah Brooks in the prosecu  
tion of their, and your orator's & oratrix's suits against  
the heirs at law of the said Jacob Staley  
deceased. And that your Honor may decree  
to your orator & oratrix's the amount of their  
claims out of the proceeds of the sale of said  
lands. but if your Honor should conceive  
that unjust then your orator & oratrix pray  
that the said Barbara Staley Administratrix,  
or the securities in the administration bond  
above mentioned may be compelled to pay  
your orator and oratrix's the amount of their  
claims <sup>with interest</sup> which they hold in their own rights &  
the rights of others transferred to them, as dis  
tributees of the estate of the said Abraham  
Staley deceased To which end your orator &  
oratrix pray that Barbara Staley Administratrix of  
Abraham Staley deceased & Joseph Staley, Benjamin  
Kinzy & Polly his wife late Polly Staley, Benjamin Staley,  
Betsey Staley, Rachel Staley, Abraham Staley, Reubin Staley  
and John Staley children and heirs of Jacob Staley  
deceased who was an administrator of Abraham Staley  
deceased and Catherine Staley widow and relict of the said  
Jacob Staley deceased also Peter Kinder and Mary his wife  
late Mary Staley Christiana Kinder and Rosanna his wife  
late Rosanna Staley, Abraham Staley, Christina Staley  
and Rodfult and Barbara his wife late Barbara Staley

Leonard Straw & Henry Huddle Securities in  
the administration bond executed by Barbara Staley  
~~and Jacob Staley~~ <sup>and by</sup> ~~and~~ <sup>and</sup> Jacob Staley now deceased as Administrators ~~and Admini~~  
strators of the estate of Abraham Staley deceased, may  
be made Defendants unto this Bill and upon their  
corporal oaths true and perfect answer make to  
all and singular the premises herein contained  
as fully and truly as if they were again repeated  
in form of interrogatories your Orator <sup>oratrix</sup> prays that  
an account may be taken to ascertain fully ~~show~~  
much has come to the hands of the said Jacob &  
Barbara Staley <sup>admins of said</sup> which they have not settled or  
accounted for in any way ~~also~~ to ascertain the  
true amount which your orator & oratrix are intitled  
to as distributees of the estate of the said Abraham  
Staley deceased and that <sup>that sum</sup> with the interest thereon  
from the time it should have been paid may be decreed  
to your orator & oratrix together with <sup>the</sup> claims that your  
orator Henry has purchased from other distributees with  
interest, to be paid out of the proceeds of <sup>the</sup> sale of the Land  
of the said Jacob Staley <sup>deceased</sup>, or in such other manner  
as your Honor may think just, and equitable. And  
your orator & oratrix pray that your Honor may Grant  
them such other and further relief as is consistent  
with equity and justice, and particularly adabted  
to your Orators ~~& oratrix~~ care, and that the  
Commonwealths writ of subpoena quire &c.

A. Chapman for plffs