

To the Hon<sup>t</sup> Judge of the Circuit Court of Greenville County,

The separate answer of John M. Woody to a Bill & Answered Bill exhibited against him & others in this cause by W. W. Robinson.

This Respondent saving &c. reserving &c. for answer to so much of said Bill as he is advised it is material or necessary for him to answer, says, that on the 20<sup>th</sup> day of January 1855, P. H. Garner was indebted to this Respondent about \$10,000. which he proposed to pay in Bonds, to which this Respondent consented, that said P. H. Garner at that time transferred to your Respondent with other claims \$500. of a Bond for \$1000. executed by W. W. Robinson to him bearing date on the 24<sup>th</sup> day of December 1852, payable with Int from that date. On the 1<sup>st</sup> day of January 1854, that Garner represented at that time, that said Robinson had paid a part of said Bond but he did not know how much, & for that reason he assigned but \$500. of the Bond. But that subsequent thereto, to wit on the 30<sup>th</sup> day of January 1855, just ten days thereafter the said Garner being unable to make up the balance in the paper proposed to give a full assignment of the whole Bond, which he then & there did and assigned the whole face of the Bond to this Respondent, for the whole \$1000. of its Interest & two other small Bonds. the one for \$27.20cts & the other for the sum of \$33.08cts. while 3 Bonds with their Interest amounted to more than \$1100. upon application to W. W. Robinson he presented his check to him from Garner for two sums to wit \$400. & \$200. in part of said Bonds but stated that he still owed \$500. said Robinson