

To the Hon. Richard H. Bassett, Judge of the
Circuit Court of Greenville County - In chambers

Humbly complaining, sheweth unto the Court, your
complaint - William W. Benson ~~has~~ a resi-
dent of the County aforesaid; that less than your com-
plaint exhibited in this Court his original bill
of complaint - against B. D. Gillam, P. H. Gornew, Horrus J.
Gornew and James M. Gornew for certain purposes and objects
therin set forth and explained - In addition to the state-
ments and allegations in said original bill contained, your
complaint states that the said bond therin mentioned ex-
ecuted by him to P. H. Gornew, upon which judgment was
stated in this Court for the benefit of B. D. Gillam, was
signed by the said P. H. Gornew to James M. Gornew, and
by the said James M. Gornew to Horrus J. Gornew, who signed
the same to B. D. Gillam on the 18th March 1858; the said
bond containing no enclosure of the dates of the other assign-
ments - Your complaint further states that the said bonds
executed by him to P. H. Gornew, as stated in the original
bill, and which were the foundation and origin of the
bond and judgment theron in controversy in this
suit, before the execution of the last named bond, were assigned
by the said P. H. Gornew to John M. Moody, who recd from
your complaint after the assignment, the sum of \$
230. on the 23rd March 1853 - in part of the larger bond, as appears by the receipt
of said Moody herewith filed (Marked A) that previous
to the assignments of said bonds by P. H. Gornew, your
complaint paid to him in part thereof, the sum of \$400
on the 5th Decr. 1853, and \$200. on the 20th August 1854, as
will appear from the receipts of said Gornew less with
filed (Marked B & C) none of which payments were made
on either of the bonds - That subsequent to the payment to
Moody as above stated, he brought suit on said bonds against
the said P. H. Gornew and your complainant in the County Court