

1857, your complaint paid in part of said bond
the sum of \$303. which is enclosed therein. That the
said bond was transferred to one ^{James M. Gaynes} ~~James M. Gaynes~~ by the
said P. N. Gorman, and by him assigned to B. D. Lillie
on the 18th March 1858, as appear by enclosures to our
said bond, a copy of which is herewith filed. That the
said B. D. Lillie instituted suit on said bond against
your complaint; in the name of P. N. Gorman for the
benefit of B. D. Lillie, in the County of Greenville
and at the s^{ve} Sessions of the Circuit Court of said
County, in the year 1858, obtained judgment against
your complaint for the sum of \$663.81 and the
costs of the suit; entirely omitting the sum not credited
on the bond as above stated. ^{which is typic of the copy of the bond} ~~Your complaint further~~
~~states that the said bond was paid~~ all of which
will appear from a copy of said judgment, herewith
filed as part of this bill. Your complaint further
states, that the said bond named bond upon which, the
judgment was obtained as above stated against him,
was executed to the said P. N. Gorman in payment of the
balance found due him on the settlement of the three
bonds as above stated. That in said settlement no ac-
count was taken of the payment of the sum of \$250
made to the said Gorman as above stated on the 23rd March
1855, but by accident or oversight the said payment
was omitted, and your complaint not credited for the
amt, and consequently the said bond was executed in a
larger amount than he justly owed the said Gorman, by
the said sum of \$250 - and the said judgment was granted
for more than was justly due by the same amount.
Your complaint further states that the said balance
found due on the settlement as above stated, and the said
bond executed thereon, as above mentioned are erroneous
in other respects - that they include the costs of the
suits brought by the said Gorman against the said Gorman

amounting to the sum of \$27.31, and too large an
amount of interest; by erroneous calculation; of all of
which mistakes and errors, your complaint informed
the said Gorman before he assigned the said bond, and he
promised to correct them. That your complaint has
been at all times ready and is now to pay the balance
justly due on said bond. and that the said judgment
above stated, being contrary to justice and equity, ought
not to be upheld against him.

In consideration of the facts before stated your com-
plaint prays that P. N. Gorman, ^{James M. Gaynes} ~~James M. Gaynes~~
^{Thos. D. Gorman} ~~Thos. D. Gorman~~ and B. D. Lillie be made defendants to this bill,
that they own the same, that the usual order of pub-
lication be made against the said P. N. Gorman and the
said ^{James M. Gaynes} ~~James M. Gaynes~~ ^{Thos. D. Gorman} ~~Thos. D. Gorman~~ who are residents of this State
and that your Honor will grant an injunction restraining
the said judgment, and all other and general relief
as justice and equity may demand - And he well as an
duty bound in prayer -

M. S. Goodenough
att'y &c

Greenville County to wit.

This day personally appeared before me a
justice of the peace of the County of said, William
M. Robinson who made oath that the facts stated
in the above bill are true to the best of his knowl-
edge and belief - Given under my hand this 16th day
of November in the year 1858

A. C. Mose (J. P.)