

To the worshipful the court of Southampton county in chancery
sitting, Humbly complaining sheweth unto your worships your
orators Michael Jabb & Martha his wife (Spencer Pierce,
(Matthew Pierce) ^{Peter Pierce} Nathaniel Pierce, Peter Pierce, & Botten
Pierce, by Sam. Calvert — Their guardian & next
friend appointed by this court for the express purpose of carrying
into effect the premises) that sometime on or about the
day of ^{in the year of our Lord 1792} a certain ^{lice}
Botten Pierce of this county departed this life in testate
being seized & possessed at the time of his death of a considerable
estate both real & personal — Your orators further shew
that they are the legal heirs & representatives of the deceased
& that they have often applied to Elizabeth Pierce the
relict of the said deceased to have her third in the lands &
slaves of her said husband set apart & allotted her, in order that
your orators might have a fair & equal distribution of
the residue between them — But so it is may
it please y^r worships that the said Elizabeth Pierce, the
widow & relict of the said Botten Pierce, in
& confederating with divers others (whose names when since
y^r orators may be made dependant to this their bill with
to charge them) hitherto hath refused to comply with
y^r orators most reasonable request; pretending & saying
that your orators are not entitled to
part of the lands & slaves of her late husband's till he
deceased — In tender consideration whereof, & for
much & your orators are properly reliable in a court
of equity, the end therefore that the said Elizabeth
may ^{corporal oath} full true & perfect and