

Page 3: of the said Moses Skaggs deceased all of which will more fully and at large appear from instruments of writing executed by the said heirs and distributees of the estate of the said Moses Skaggs deceased as aforesaid which writings marked one, two, three & four are herewith filed and made a part of this Bill that your orators have since their purchase as aforesaid called on and demanded of the said Cavin and Blevin a settlement and distribution of the Estate of the said Moses Skaggs deceased that the said Blevin and Cavin utterly failed and refused to settle and make distribution of said Estate with your orators. That the said Blevin and Cavin took possession of the tract of land belonging to the estate of this said Moses Skaggs deceased as the Administrators of said Estate and has as such rented the same out and received the rent therefor and now has as such the possession of said tract of land and fails and refuses to deliver the possession of the same to your orators. All of which acting and doings of the said Cavin and Blevin are contrary to Equity and good conscience and manifestly tends to the injury and oppression of your orators and in as much as they are remedies in the premises at law & can only be relieved in Equity when proved hardships & care more properly when one may have

Page 4: executed bond as Administrator of said Moses as aforesaid with James T Carter, John Meirs and Charles Blevins his securities and that the said Jones took possession (marked thru) the slaves and what personal property yet remained into his possession and had then appraised and returned an inventory and said appraisement made in due form by him as Administrator of said Moses as aforesaid to the County Court of Green which was approved of by said court and ordered to be recorded all of which will more fully appear from a copy of said order Bond and Inventory and appraisement which is herewith filed marked (A) and is made a part of this Bill. That Jones made no sale of the personal property that came into his hands aforesaid, that he kept and applied to his own use the work and labour and hire of said slaves from the time he was appointed administrator as aforesaid until the day of 1834 when he departed this life which work labour & hire was reasonably worth the sum of \$300 per year from the time he Administered until his death that aforesaid Jones when he was the Administrator of said Moses as aforesaid collected and received large sums of money that was due & coming to the Estate of said Moses to wit the sum of \$1000 That after the death of said Jones to wit on the () day of October 1834 the said Charles Blevins, and William Cavin was on their motion regularly appointed Adminis-

Page 5: trators of the Goods chattles rights and credits of the Estate of the said Moses by the County Court of Green and they executed bond with William Coakly, James Mears and Robert Scoot their securities and the said Blevins and Cavin took possession of the slaves and the personal property which was yet unsold belonging to the Estate of the said Moses, and had the same regularly appraised and returned to the County Court of Green, which appraisement was approved of and ordered to be recorded by said Court all of which will more fully and at large appear from a copy of said order bond and appraisement which is herewith filed marked (B) and is made a part of this Bill that the said Blevin and Cavin since they was appointed Administrator of the Estate of said Moses as aforesaid sold one of said slaves to wit Rachel worth \$700 and has applied the money to their own use. That the hire of said Rachel is & has been ever since the said Cavin and Blevin received the possession of her as aforesaid reasonably worth the sum of \$50 per year that the said Blevin and Cavin have ever since they received the possession of the said slaves as aforesaid kept and applied their work and labor to their own use which is now & has been ever since they received them as aforesaid reasonably worth the sum of \$300 per year that the said Blevin and Cavin have received and collected since they was appointed Administrators of the estate of the said Moses as aforesaid large sums of money that was due and owing the Estate of said Moses to wit the sum of \$1000 all of which they have

Page 6: invested. May it please your Honer the premise considered to Grant them chancery process against the said James T Carter, John Meers and Charles Blevins the securities of the said William Jones deceased and the said Charles Blevins and William Cavin and William Coakly, James Mears and Robert Scott their securities, and the said sons and daughters and their husbands as before stated of the said John Skaggs deceased and of the said Susannah Whit and her husband Richard Whit and of the said Lydia Harman and her husband Mathias Harman and of the said Elizabeth Hankins and her husband John Hankins and of the said Nancy Merady and her husband William Merady who are the only heirs and distributees of the said

Moses Skaggs deceased, all of whom your orators makes defendants to this Bill may be compeled to appear and answer all and singular the allegations of the same on oath that the said Blevin and Cavin answer and say how many children of the said Slaves has been born since they came into their possession as before stated what is their age, names and sex. hat your Honer decree in favour of your orators against the defts Carter, John Meers and Charles Blevin for such sums as may be coming to them as afsd from the said William Jones deceased that was

Page 7: applied to their own use that the said Moses Skaggs deceased left at his death four sisters to wit Susannah Skaggs had intermarried with on Richard Whit, Lydia who had intermarried with Mathias Harman, Elizabeth who had intermarried with John Hankins, and Nancy who had intermarried with William Merady and brothers to wit John Skaggs, Henry Skaggs, Richard Skaggs, Charles Skaggs, Mathias Skaggs & Jacob Skaggs, ~~that the afsd children~~ that the afsd brothers all except John Skaggs have since the death of the said Moses departed this life intestate and without issue leaving the said John Skaggs and the afsd Susanah Whit and her husband Richard Whit, Lydia Harman and her husband Mathias Harman, Elizabeth Hankins and her husband John Hankins and Nancy Merady and her husband William Merady ~~and the said John Skaggs~~ their only heirs at law that the said John Skaggs, Susanah Whit & her husband Richard Whit, Lydia Harman and her husband Mathias Harman, Elizabeth Hankins and her husband John Hankins, and Nancy Merady and her husband William Merady have also departed this life intestate leaving the following persons their children and heirs at law towit the said John Skagg had one daughter named Susanah who is now the wife of William Quary and one other daughter named now the wife of Thomas York and one other daughter named now the wife of Laban Ellis and one other daughter named Rebecca Skaggs who remains unmarried. The only children and heirs at law of the said Richard Whit and his wife Susanah late Susanah Skaggs are Susanah Criswelll, late Susanah Whit who intermarried with Criswell who after his marriage with said Susanah departed this life and Edmond Whit and the only children and

Page 8: heirs at law of the said Lydia Harman and her husband Mathias Harman are Adam Harman, Henry Harman and Mathias Harman and one daughter named who is now the wife of Robert Beavers and one other daughter named now the wife of Moses Beavers and one other daughter named now the wife of Thomas Christian. The only children and heirs at law of Elizabeth Hankins and her husband John Hankins are one daughter named who is now the wife of Archabald Maloney, one other daughter named now the wife of John Mitchell and one other daughter named now the wife of John Howell and one other daughter named now the wife of Joseph Whit and Prathena Hankins, Lucy Hankins, and Lydia Hankins and Joseph Hankins & Moses Hankins and the only children and heirs at law of the said Nancy Merady and her husband William Merady are James Merady, John Merady, Daniel Merady, Mathias Merady and William Merady that the afsd sons and daughters of the said John Skaggs and of the said Susanah Whit and Richard Whit her husband and of the said Lydia Harman and her husband, Mathias Harman and of the said Elizabeth Hankins and John Hankins her husband and of the said Nancy Merady and her husband William Merady are now the only heirs at law of the said Moses Skaggs deceased. They state that the widow of the said Moses after the death of the said Moses and

Page 9: before her death afsd sold and conveyed all her right title interest and claim in & to the Estate of the said Moses to the said Charles Blevin and that at her death she had no interest whatever in said Estate. Your orators state that the number names and sex of the afsd slaves that came into the possession of the said Jones and afterwards into the possession of the said Blevin and Cavin as the Administrators of the estate of the said Moses Skaggs deceased will fully and at large appear from the copies of the afsd inventory and appraisement made out by them and returned to the county court of Green as afsd which is made a part of the Bill as afsd. They charge that there has been other slaves children of the afsd slaves born since they came into the possession of the said Cavin and Blevin as afsd. Your orators charge that they have recently purchased for a valuable consideration the intire interest right and title of the sons and daughters and the husbands of the daughters as before stated of the said John Skaggs, Susanah Whit and her husband Richard Whit, Elizabeth Hankins and her husband John Hankins and Mathias Harman and his wife Lydia Harman and the said

William Merady and his wife Nancy Merady who are now and was at the time afsd the purchase the only heirs at law & distributees

Page 10: [damaged] ___?___ decree in favor of the said Blevin and Cavin ___?___ to your oraters the afsd and the ___?___ of land Honer decree against said & heir securities value ___?___ Rachel together with ___?___ ___?___ the amount that the said Blevin ___?___ may be found indebted ___?___ final ___?___ of said Estate and further Grant unto your oraters all such other and further relief as they may show them selves entitled to and they as in duty bond will ever pray (appears to be a signature, not legible)

Page 11: The answer of William Skaggs Senr to a Bill filed in chancery by A & J Lewis against him and others in the Green Circuit Court who for answer say, he is is a son and heir at law of Jacob Skaggs, deceased a brother of Moses Skaggs deceased and that he is willing for a decree to be entered in favour of said A & J Lewis for that portion of said Moses Skaggs Estate that may be coming to this deft at the present term of the said Court and having fully answered he prays, to be dismissed &c.

/s/ William Skaggs

Messrs. Charles Blevins, William Cavin, James T. Carter, John Meers, William Coakley, James Meers, and Robert Scott, Take notice, that on the 27 of () day of this month at the house of William Skaggs, on Alecks fork of Pitmans Creek, we shall proceed to take the depositions of Frances Samples, William Ratliff and others to be read as evidence on the trial of a suit in chancery now pending in the Green Circuit Court wherein we are Complainants and yourselves and others are defendants. If we do not finish on that day we will continue from day to day until all are finished. April the 18th 1836.

/s/ Aaron Lewis

/s/ Jeremiah Lewis

Page 13: The deponon of William Ratliff taken at the house of William Skaggs, on Aleck fork of Pitmans Creek pursuant to notice on the 27th of April 1836, to be read in evidence on the trial of a suit in Chancery now pending in the Green Circuit Court, in which Aaron and Jeremiah Lewis are complainants and William Cavin, Charles Blevins, and others are defendants. The deponent being of lawful age and first duly sworn deposeh and says I was acquainted with Moses Skaggs of Green County, Kentucky. He had four sisters towit Susanah, who married one Richard Whit, Lydia, who married Matthias Harman, Betty (Elizabeth) who married John Hankins, and Nancy who married William Meridy. I was acquainted with all of them in the State of Virginia, and quite intimate with them.

Question by Complainants: Have Moses Skaggs or not one brother by the name of John Skaggs.

Answer: Yes he had.

Question of same: Have or have not the sisters above named the only sisters, which Moses Skaggs had.

Answer: Yes they were all that I know of.

Page 14: Question of same: State if you can when Moses Skaggs died and where he lived at the time of his death.

Answer: I can not say certainly when he died, but think it has been about forty years. He died at his house in Green County.

Question by same: Did or did not sd Moses Skaggs have at his death any children.

Answer: He never had any children that I know of. He had none I know when he died.

Question by same: Did or did not Richard Whit & wife, Matthias Harman & wife, and John Hankins and wife live in the State of Virginia.

Answer: They did.

Question by Defendant: Are you acquainted with the Children of John Hankins, Hezekiah Whit & Matthias Harman.

Answer: None but the Children of Hankins and one of Whit.

Question by same: State how long it has been since you was acquainted with the above named Children.

Answer: About thirty years.

Page 15: Question by same: Was you acquainted with the sisters of Moses Skaggs previous to their marriage.

Answer: Yes I was.

Question by same: Was you acquainted with the brothers of Moses Skaggs, if so name them.

I was acquainted with Henry, James, Charles, John, Richard & Jacob, these were all the brothers of William Skaggs

[This should read Moses for William].

Question by same: Did you know them in Kentucky and did they not all raise large families.

Answer: Yes I believe they did.

Question by same: Was you acquainted with the children of the above named persons.

Answer: I was acquainted with some of them Rachel Blevins, Archabal Skaggs, Thomas Skaggs, William Skaggs, these are Charles Skaggs children.

Question by same: Was you acquainted with Henry Skaggs children & how many of them

Answer: I was acquainted Lucy Stacy, Mary Combs & James Skaggs & Silvey Roark.

Question by same: Was you acquainted with the children of James Skaggs

I was acquainted with William Skaggs & Rachel Etherton the children of James Skaggs.

Page 16: Question by same: Was you acquainted with Richard Skaggs children.

Answer: I knew Henry Skaggs.

Question: Did all the children of the above named persons live in the state of Kentucky & the County Green.

Answer: I believe they did.

Question of Complainants: Were you or not acquainted with the children of Jacob Skaggs.

Answer: He had one son by the name of William Skaggs who is now living in Green County.

And further this deponent says no.

/s/ William (x) Ratliff (his mark)

Also in deposition of Frances Samples, taken at the same time and place and for the same purpose. This deponent being of lawful age and first duly sworn says.

Question of Complainant: Were you or not acquainted with Moses Skaggs, who died in Green County about forty years since.

Answer: I was.

Question of same: How many sisters had by and when did they marry. Answer: He had four sisters only, to wit Susana married Richard Whit, Lydia married

Page 17: Matthias Harman, Elizabeth married John Hankins, and Nancy who married Meridy.

Question by same: Did they or not live in the State of Virginia when you knew them.

Answer: I think it was.

Question by same: Had or not Moses Skaggs also some brothers, and if so name them.

Answer: I think he had six brothers towit. Henry, John, James, Charles, Richard, Jacob. These were all that I ever knew and believe he ever had.

Question by same: Did or did not Moses Skaggs ever have any children.

Answer: No, he never had any that I ever knew and I was intimately acquainted with him.

Question of same: Was or not the wife of sd Moses Skaggs named Elizabeth, and did she not survive him.

Answer: Yes, that was her name, and she did survive him many years & she has been dead not a long while.

Question by same: Have or not you and Jacob Skaggs

Page 18: (partial) brother of sd Moses lawfully married with.

Answer: We were, and lived together many years as man & wife.

Question by same: How many children had you and what are their names.

Answer: We had but one, and he is named William and is now living in this County.

Question by Defendants: Do you consider yourself the widow of Jacob Skaggs deceased.

Answer: I do.

Question by same: Do or do you not consider yourself interested in the estate of Moses Skaggs Decd [either for yourself or your son William] marked thru.

Answer: I do not know that I do.

Question by same: Do you or do you not consider yourself interested in sd Estate for your son William.

Answer: I do not and further this deponant sayeth not.

/s/ Frances (x) Samples (her mark)

Page 24: Also the deposition of Peter Despain taken at the same time and place and for the same purpose the deponent being of lawful age and and sworn deposed & says.

Question by complainant: Were you or not acquainted with Moses Skaggs and formerly of Green County
Answer: I was, I lived with in the State of Virginia and came with him to this County.

Question by same: Did he or not die in this county, did he or not have or ever have any children.
Answer: He did die in this county many years ago. He never had any children. His father and mother died many years before Moses. He had however four sisters only towit, Susanah, Lydia, Elizabeth and Nancy. Susanah married Richard Whit, Lydia married Matthias Harman, Elizabeth married John Hankins and Nancy married William Meridy. He also had the following brothers towit, James Henry, Richard, John, Jacob and Charles. Elizabeth, Susanah and Lydia with their husbands lived in Virginia, where I suppose their children are now living.

Question by same: Did or not Moses Skaggs die before any of his sisters and before John Skaggs.
Answer: I do not know when the sisters in Virginia died. Moses however died many years ago and before his sister Nancy Meridy and before John Skaggs.

Page 25: Commonwealth of Kentucky to the sheriff of Green County Greeting you are hear by Commanded to summon James T Carter, John Mears, Charles Blevins, William Cavin, William Coakly, James Mears, Robert Scott, Susanah Quarry, Thomas York and wife, Labin Ellis & wife, Rebecca Skaggs, Susanah Criswell, Edmond Whit, Adam Harman, Henry Harmon, Mathias Harman, Robert Beavers and wife, Moses Beavers & wife, Thomas Christian & wife, Archibald Malony & wife, John itchell & wife, John Howell & wife, Joseph Whit, Prathena Hankins, Lucy Hankins, Lydia Hankins, Joseph Hankins, Moses Hankins, James Mirady, John Mirady, Daniel Mirady, Mathias Mirady & William Mirady to appear before the judge of the Green Circuit Court at the Court house in Greensburg on the 1st day of our May term next to answer a bill in Chancery exhibited against them in our said Court by Aaron Lewis and Jeremiah Lewis and this you shall in no wise omit under the penalty of £100. and have them there this wit witness John Barret Clerk of our said Court at the Clerks office in Greensburg this
3rd day of March 1836 and 44th year of the Commonwealth.

/s/ John Barret

Page 26: Aaron & Jeramiah Lewis amends their Bill in the suit now pending in the Green Circuit Court of them against the Administrator heirs and Moses Skaggs deceased and others now pending in Chancery, these complainants state that they have been informed and charges that the Brothers of the said Moses Skaggs as named and set forth by them in their said original Bill towit Henry Skaggs, Richard Skaggs Charles Skaggs, Jacob Skaggs & James Skaggs all died without lawful children as they believe. That the said James departed this life long since and after the death of the said Moses that each of the said brothers named and set forth in this Bill never was married but your orators have been informed and charges that each one of them had what is called natural children, at their death who are same of whom they have been informed set up claim to a part of the Estate of the said Moses Skaggs as the lawful children and heirs at law of the afsd deceased brothers of the said Moses desd.

Page 27: They state that the names and residence of the natural children of the heirs at law (if there be any other than they have stated in Bill) of the heirs at law of the Brothers of the said Moses Skaggs deceased are all unknown to these complainants except William Skaggs who they are informed claims to be the son & heir of the afsd Jacob Skaggs deceased. These complainants state that the names of the heirs at law of the Widdow Elizabeth Skaggs & of the said Moses Skaggs deceased are also unknown to them. They state that she died

many years since in the county of Green and that no person has ever administered on her estate. They make the unknown heirs at law of the Brothers of the said Moses Skaggs decd. towit Charles, Jacob, Henry, Richard and James Skaggs whose names are unknown to your orator except as before stated defendants to this and the original Bill they also make the unknown heirs at law of the Widow of the said Moses Skaggs deceased defendants. to this & their original Bill, They also make the said William Skaggs a deft. to sd Bill and pray that they may be compeled to appear and answer all the allegations of said Bills, and that your Honor grant unto your orators all such relief as they have asked for in their original Bill and they as in duty bound will ever pray &c.

Page 28: This day personally appeared before me a Justice of the peace in and for the County of Green and State of Kentucky. The within named Aaron and Jeramiah Lewis and made oaths that the surities of the Heirs at law of Henry Skaggs, Charles Skaggs, Richard Skaggs, Jacob Skaggs and James Skaggs deceased brothers of Moses Skaggs deceased if there are others than these named and aledged in their original & amended Bill filed in this cause. Also the names of the heirs at law of Elizabeth Skaggs deceased the Widdow of the said Moses Skaggs deceased are all unknown to them except so far as their names are set forth in their original & amended Bill. Given under my hand this 1st day of September 1837.

/s/ Alexandr. McCandless J.P.GC

Page 29: I, J. H. Caulfield, printer and publisher, of the "Kentucky Register," a public authorised newspaper, published in Elizabethtown, Ky., do certify, that, the annexed order of publication in Chancery, wherein Jeremiah Lewis and Aaron Lewis are complainants against the heirs of Moses Skaggs deceased defendants has been published in said paper for two calendar months, by successive weekly insertions, commencing on the 2nd day of April last and ending on the 2nd day of June 1836. Given under my hand this 2nd day of June 1836.

J. H. Caulfield

Proprietor, Printer & Publisher of "Ky. Register."
Printer's fee \$5.00

ADVERTISEMENTS

Green Circuit court, Feb. term, 1836

Jeremiah Lewis and Aaron Lewis, complainants, against the heirs of Moses Skeggs, dec'd, defts.--In Chancery: This day came the complainants and filed their bill, and it appearing to the satisfaction of the court, that the defendants James Meredeth, John Meredeth, Daniel Meredeth, Matthew Meredeth, Wm. Meredeth, Susanna Quarry and Wm. Quarry her husband, Thomas York and wife, Laban Ellis and wife, Rebecca Skaggs, Susanna Criswell, Edw. Whit, Adam Harman, Henry Harman, Matthias Harman, Robert Beavers and wife, Moses Beavers and wife, Thomas Christian and wife, Josiah Whit and wife, Archibald Maloney and wife, John Mitchell and wife, Joseph Howell and wife, Parthena Hankins, Lucy Hankins, Lydia Hankins, Joseph Hankins, and Moses Hankins, are not inhabitants of this commonwealth, and they not having answered the complainants bill a greeably to law and the rules of this court. it is ordered that unless the aforesaid nonresidents do answer the same on or before the first day of the next term of this court, the same will be taken as confessed against them. A Copy test,

John Barret, Cl'k.

April 2~~nd~~

Charles Blevins and Wm. Cavin}
vs.
Jeremiah Lewis & Aaron Lewis } In Chny.

The respondents separately came & defend to and not admitting, but protesting against & denying the allegations of the bill of the Compls. for answer thereto separately say, that the afsd. bill and the matters and things therein containd. are not good & sufficient in law, for him to have & maintain his sd. bill; and each one says, that he is not bound by the law of the land further to answer thereto; and this they are ready to verify &C.

/s/ Buckner for Deft.

Page 30: Messrs. Jeremiah Lewis & Aaron Lewis Take Notice that on the 1st Monday in February next we shall take the depositions of Elias Barbee & others at the house of William Sympson Esqr. in Green County to be read as evidence in the suit in Chancery defending in the Green Circuit Court in which you are Compls. & we are Defts. & we shall continue from day to day till they be completed.

16th Jany 1837
/s/ Wm Cavins
/s/ Charles Blevins

Page 31: The deposition of Elias Barbee taken at the House of William Sympson in the County of Green and State of Kentucky on the 6th day of February 1837 agreebly To the notice hereto annexed to be heard as evidence on the part of the defendants in a suit in Chancery now Depending in the Circuit Court for the County of Green where in Jeramiah Lewis and Aaron Lewis is Complainers and William Cavin and Charles Blevins Defendants the deponant being of lawful age and first duly sworn deposeth and saith

Question by deponants: Are you are you not acquainted towitt the lands of Moses Skaggs decd. where on William Jones decd. formerly lived.
Answer: I am.

Question by same: Is the land increased in value by the improvement made by said Jones.
Answer: I want to presume that its value had been increased but to what extent I am not able to say.

Question by same: Was you or was you not acquainted with Moses Skaggs decd. in his life time.
Answer: I was.

Page 32: 2nd question by same: Was you or was you not acquainted with the Brothers & Sisters of sd. Skaggs & if so how many of them.
Answer: I was. I was not acquainted with his sisters if he had any. Those of his Brothers who claimed to be such was Henry Skaggs, Charles Skaggs, John Skaggs, Richd. Skaggs & Jacob Skagg.

Question by same: Do you or do you not recollect how long since the death of Moses Skeaggs.
Answer. I do not recollect but suppose about forty years.

Question by same: Do you know if any of his Brothers are living.