

1 Wivl Aplalid Kej N1a The answer of John Newton

2 th[e] and bill of complaynant of

3 The said Defendant swon and v**** of **em suwth that he said bill of complaint

4 matters therein conteyned are y****g*ed and devised by th[e] said complaynant *** of

5 mayneteyne such in the Lawe yet ne*ehe*sse if theist Defend[an]ts shalbe by the orcer of this Courte

6 insufficient bill of compleant Then the advantage of the insuffientce thereof at a*cy*ies hir ater unto the said Def[endan]s sw**Affor[e] further answers protott*ion

7 not knowinge nor cousessinge that the Quenes mu*esi** is lawfullie seised in her demesene one of Fee of and in the said manor of Spondon and Chadisd[o]n

8 in the said countie of Darbie as in the ragen of her said Duchie of Lancaster as in the said bill is declar[e]d suen and Dm* of them sueth that they the said

9 Defend[antes be Dwellers inhabitantes of and in the towne of Spondon in w[hi]ch towns the said manors of Spondon is within w[hi]ch town ther[e] is and the

10 out of mynd hath byn one anacent and landaol** custome that all the inhabatantes Dwell**** *in inhabiting within the said towne and D**y of them have

11 usuallie had & used by all the tyme and space afore said comon of pasture within the said pe[i]c[e] of ground called Slycter in the said bill mencynod for all inucmen

12 the catall of them and Dny of them at all tymes of the ye[a]re when a certon feild within the said Towne called the feild awandes *orewghes asseybyethes Follow uppon the

13 west side of w[hi]ch feild the said pe[i]ce of ground called the Sicke adwyneth, And when seen *hat the same land is on hath by in swen then they harw by all the said

14 space had and used the same comon at comontyme and tymes Dny yore after that the corne there **r hath oene severt[e] or caryn thene/until the same be on grass land

15 Anen aganie and Daringe all such tym and whensoen as the same feild hath by in m[a]ny ye[a]r Awn with my corne or grayne the said inhabitantes wrong*th take

16 by all the said tyme used to take all and singular her proffitte comynge risinge or growinge in and by the same pe[i]ce of ground by then solses or by any and to whom by*y

17 have litten the same to their **** pry of and beharf *ryreus[e] in wher[e]of theis Defendantes have ariviv heretofore put in their cattell into the said pe[i]ce

18 of ground and there have occupy[e]d and Divyd the said comon of pasture from tyme to tyme morninge to the forsome custome of longe tyme use and approved

19 as landfall was and is for them to doe without that tyat the gñemes in*estne by her heighnes has puttentes under th[e] *ate of her duchie of Lancaster Did consians a

20 ordeyne and appoint the said court to be bayliffe of her said mannors of Spondon and Chadsdyn and further by the said print Did g** and grant unto him the

21 said complaynt such ye[a]rile Fe[e]s proffittes, comodities and annuyties as be and have byn unastomed to be proved rerewn and **d fore the ***** of the said

22 office as in the said bill of compl[aint] is most untrewlie alledged Or that by virtue thereof the said compl[ainantes] hath perced the said offer accordinglie as in the said bill

23 is litewis untrewlie alledged, And in chou[r]t that the Quenes m[a]g[es]tie have bene and is seised in her demesne as of Fee of and in the said pe[i]c[e] of ground

24 called the Sicke al[ja]s le Sicke al[ja]s le suche and of and in howse ~~and~~ and certon arable land and merpare then into *****ing in the towne of cona to
25 set lyinge and being in Spondon aforesaid in the said countie of Derby and being p[ar]cell of the said manor of Spondon as inderise in the said bill as untruly declared
26 And in that that the bailif[f] of the said manors of Spondon Chaddesdon by all the tyme whereof the memory of man or not to the contrary have occupied the
27 said landes as appteyning and be longinge unto the said office as likewise in the said bill is untrnwho alledged Or their by p** *** of the said ***** on and unto the said
28 plimff and the proffetes thereof Did **** *****e and **k as belonging unto the said Office until
29 And without that that the said their ***e w** age without my coke of ***le h*** ***** *****c**r*d** in
30 as alledged For in verydeed they h***e in *e no vintred their *** all other *** by ***** of the said
31 and landfall by the said **stn a* ** the said albeit the title of the said com*d were tre *e as in
32 h**ges in the said bill of complaynt contaynd mu*ry all or affectnall in the lawe to be u***d
33 Denied is trewe All w[hi]ch matters this Defend[ant] is redie to averr and pwer as this honnorable Court shall that they ** r*** *****lie
34 Out of this honorable Court with their reasonable costes and chardges in this behalf wrongfullie susteynd