

1 Br in xx^{vo} liiii si 1569 N.1.b. The replicacon of Robert newton Compl[ainsn]t to Th[e] anwas of 91

2 Beol John noton and Henrie Lockooe deff[en]d[an]tes

3 The said Compl[ainant] for replicacon sayeth and averreth and meynteyneth all and eny thing conteyned in his said Byll of

4 Complaynt to be good lawfull and trewe in such man and Fourme as the same ys in his said Bill alleaged and

5 declared, And further sayeth that the said Bill ys certeyn true sufficient ~~and werthe~~ in law to be answered unto

6 And that the matters ther[e]in conteyned be not Devysee of any evyll will or malyce or ymagined to thmtent to

7 putt the said deff[endant]es to wrongfull vexacon trouble and sayth in the lawe, but that the same be grownded

8 upon good inst and lawfull causes and consideracons without that that there ys or hath bene tyme owt of mynd

9 any annycient landable Custome of the said mannor of Spondon that my th[e] inhabitantns Dwelling and inhabiting within

10 the same towne have usuallie had or used by all the tyme and space wher[e]of the memorie of man ys not to the contrarie

11 comon of pasture within the said peece of ground called the Sycke al[ia]s le Sych for any there beastes or catalle

12 att all tymes in the yeare when a certeyn f[i]eld called Boroughe asse lyeth fallowe And without yt

13 that whensoen the said field hath bene or ys sowed they the said Inhabitanntes have by all the tyme where[e]of

14 the memorie of man ys nott to the contrarie had and lawfullye used the same f[i]eld as comon, att all tymes any yeare

15 use that the corne be sened or carryed away untill the same be sowed agayne or that at any other

16 tyme when the same f[i]eld afore said hath bene or ys sowed w[i]th other corne or grayne any year, the sayd

17 Inhabitanntes altogether have tyme out of mynde had and used lawfully to take all and singular & p[ro]fittes rysing

18 renewing or growing in or by the said peece of ground by them selves or by any ~~Land to L*~~ by such as they have latt the

19 same to there Pre use or behof, And w[ith]hout that by reason ther[e]of the said Deffend[an]tes have hearetofore lawfully

20 putt their cattall into the said peece of ground and Divyed the same or that they might use the same as their

21 comon of pasture from tyme to tyme according to such custome as the said Deffend[an]tes have anysed And w[i]thout that
22 the same Deff[endan]tes might tru pill*** by force of ~~any~~ such custome Dutier into the premisses And without that any other
23 matter thing or thinges in the said answer conteyned matteriall to be replyed unto and not in this p[re]sent Bepls
24 vicon sufficientlie replied unto confessed and aveyled Denyed or travsed are trew All w[hi]ch matters he sayd
25 Compl[ainan]t ys readie to Liverne and prove as this honorable shall award and prayeth as afore in his said Bill
26 hath prayed
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