

The State of Mississippi

County of Hinds, 2<sup>nd</sup> dist, thereof

To the Honorable E. G. Pepton

Chancellor of the Ninth Chancery district of said state, and of the second judicial district of said county in said state. To July term of said Chancery court, to be held in Raymond in said county, 1877.

Humbly complaining, your orator, Thomas H. W. Barrett, complainant in this his original bill of complaint filed against William J. Withers and his wife Martha S. Withers, non residents of said state and residents of the city of Lexington in the County of Fayette, in the State of Kentucky, Walter J. Mahone and his wife Mittie E. Mahone, residents of the County of Hinds and State of Mississippi, and of the second district of said County of Hinds, defendants, would respectfully set forth unto your Honor the following allegations and statement of facts.

1<sup>st</sup> Your orator would state on information and belief, that shortly after the close of the late civil war, in said County, when the results thereof became known, and business transactions and calculations were made had and entered into, concerning the future based upon the changes which were thought likely to arise in the general character of business and tide of affairs, as created and brought about by the changed condition of things. Martha S. Withers