

To the honorable John Brown Judge of the high Court
of Chancery holden at Staunton; The annex of Leonard
Conlay and Nancy his wife to the bill supplemental of
the legal representatives of Samuel King, John Allen and Hannah
his wife, against the executors devisees and legal representatives
of William King deceased; Saving all exception, these defendants
answer and say; that true it is they are natives of Ireland as
was also the said William King, brother of the whole blood of the
defendant Nancy; that the said William King and the defendant Nancy
were children of Thomas King a native of Ireland, who emigrated
to the United States about the year _____ and became a native
naturalized citizen of Virginia in the year _____ as these defendants
believe, and whether that naturalization of the said Thomas King
did, or did not naturalize his children, as they respectively ac-
quired in Virginia, is a question which they submit to this
honorable Court; they further state that the defendant Leonard
Conlay, on the 6th day of October 1813, went before the district
Court holden at Washington Courthouse, and declared on
oath that it was bona fide his intention to become a
citizen of the United States, and to renounce forever all
allegiance and fidelity to any foreign prince, potentate,
state, or sovereignty, whatsoever, and particularly to George
the third King of Great Britain, as by a copy of the record
of the said district Court herewith exhibited more fully appears;
they further say that the defendant Conlay in pursuance of
that intention so declared on the 17th day of November 1813
went before the County Court of Washington, and having made
the necessary proof, took the oath necessary to be taken on being
naturalized, and was admitted a citizen, as by a copy of
the record of the said County Court herewith exhibited
more fully appears; they further say that the following
children of them the said Leonard Conlay and Nancy, to wit,
Elizabeth Davis, Nancy Cochrane, Polly King, Sally _____ were born
in the Commonwealth of Virginia; and whether if the
intention cannot rest on the defendant Nancy it may
not pass over her, and rest on her said daughters the
nieces of William King, is a question respectfully submit-
ted to this honorable Court; these defendants also insist
that

that the naturalization aforesaid, of the said Connally Finlay, should have relation back to the time of his declaration made that he intended to become a citizen, and operates to make him, his wife the defendant Nancy, and their elder children, to wit, Rachel, Alexander, & Thomas, citizens from October 1798, ten years before the decease of William King.

These defendants say, that the plaintiff, John Allen and Hannah his wife are aliens born, natives of Ireland, that Samuel King was also born an alien, and that they have no knowledge or belief that either the said Samuel King or John Allen or Hannah his wife ever became citizens of the United States, or of Virginia; that the said Samuel King and Hannah the wife of John Allen, came from Ireland in the year _____, in which country they had been left by the said Thomas King their father until that time.

These defendants pray to be hence dismissed with their costs.

Washington County, Tenn.

This day Connally Finlay personally appeared before me, a Justice of the peace for the County aforesaid and made oath, that the foregoing answer so far as relates to his own acts and doings are true; and that so far as relates to the acts and doings of others he believes it to be true. Given under my hand & seal this 10th day of June 1817

Frank Smith