

Replication on Her Majesty's behalf by Thomas Savyle, esq., 1586

From the Public Record Office

Crown copyright: Public Record Office.

Exchequer: Kings Remembrancer: Bills & Answers, Eliz., York.

E 112/50, no 100 m2 Reproduced with permission.

(The first line of the document's title is hidden by the binding.)

To the Joynte and severall Answerers of Henry Ambler and Richard Shackletons Def^{de}
The said Complaynant averring and maintayning his said Bill of Complaynt and the
matters wherein Conteyned to be good in so true and effective in such manner and forme as they been
here Alledged and expressed And that the same is not devised or imagined to or for any such
intent Cause or proposal As in the said false and fained Answer is sett forth, Unt
grounded upon very good and apparent matters wherein the Answer ma^{tie} (Perceived open

Wrong and Injury and Compelled herunto by the principle and unconscionable Dealings of the
said Defend^{te}. And saith that the said Joynt and Severall Answerers are very Uncertaine
Persons incorrect and insufficient in the law to be Replied unto. Reprovelesse the advantage of
Expressions to the contentions and insufficiencies of the said Joynts and severall Answerers at all
times hereafter saved to his Comp^{lt} and to the Queen ma^{tie}, the said Complainant for
Explication to the said Joynt and severall Answerers saith that the said Lands Tenementes and
other the premisses in the Will memoed are the Lands and Possessions of the said Sovereigne lady
the Queen And that her ma^{tie} is lawfully seised thereof in her demesne as of free in Right of her
highnes Crowne, And that an Office thereof was founde accordingly in the twentieth year of
her ma^{tie}es reignes Whereby her Ma^{tie} is lawfully intitled and vested into the real Possession of the

same And hat he and any of he said def^{te} have unjustly intruded upon he possessions of he
said sovraine Lady he Quene herein And doo wrongfully wth holde and kepe he same contrary
to all right equity and good conscience to he disinherism of her ma^{tie} And Also saies hat he said
land was lately given and appointed to he findinge of Trenches in he Church of Keighley in he
Bill specified in such manner and forme as in he said Bill is declared By reasons whereof
he same Came by Vertue of an Act of Parliament in he firste Yeare of his Reigne to he late
King of memory Kinge Edwards he sixt And from him descended to he late Quene
Mary And from her to our Sovraigne lady he Quenes ma^{tie} hat now is Big his hat his
Compt^{lt} will avow and prove for her ma^{tie} hat he Yssues and profitts of he said premisses weare
wthin five yeares next before he making of he statute made in he first yeare of he Reigne of

King Edward the sixt employed to such superstitious uses as in the Will is most truly Alledged
And that the said defendants or some of them have gotten divers writings and evidences touching
the premises Appertaining and belonging to the Queen ma^{tis} and have intruded themselves
wrongfully into the possession of her highnes And have reaved had and taken all yssues and profitts
rents and have Converted the same to there owne proper use and uses, And have likewise
Contrived and devised some secret estate upon the same premises, And further (Explies and
saies that the said Land or meadow in Stockbrigg is the Possession of our soveraigne lady the Queen
ma^{tis} And that the same was given or appointed for the keepinge of a lampe burning in the
Church of Keighley in such manner and forme as in the Will of Complaynt is most truly
Alledged W^{ch} out that One Henry Keighley Esquire deceased was in his life tyme seased of

An Acre of pasture lying in Keighley were he more sice as p^{re}l of he wast of he Lordship
of Keighley in his Demesne as of ffee And being herof so seised did in he one and twentie
yeare of he Reigne of he late Kinge of famous memory Kinge Henry he eight by Deed
Enfeoffe one Ellys Hall of he same To have and to hold to him he said Ellys Hall and his
heires for ever And gat he same Ellys by force wherof was seised in he demesne as of ffee
And so herof seised of like estate herin died seised and gat after his deathe he same distended
and came to Robert Hall as sonne and heire to he same Ellys as in he Answer is nutnly
Alledged, And w^ont gat he he said Robert by his laste will and Testament bearing date about
he firste year of he Quenes ma^{tie} reigne Devised he same to Wyolfe Hall his yongest sone and
to his heires for ever And died of like estate herin also seised And w^ont gat he said Wyolfe

By good and lawful Assurance did Henry and grant the same Acres of ground to Henry
Ambler one of the Defendant and to his heirs for ever And we must say that the said Henry
in the Will mentioed was Ennoble ground and have been time out of mynde of man full of the
demesne of the manor of Kighley aforesaid, For that the said Henry Kighley Esquire deceased
was heretofore in his life time seised in fee or fee taylor and so died heretofore seised, For that after his
decease the said manor descended and came in right to one Anne Kighley and Katheryn Kighley
daughters and Heiresses to the said Henry, For that the same Anne and Katheryn or some other
for them or in their names or to their uses into the said lands now in the tenure of the said Defendant
as full of the said manor entered and were heretofore seised in their Demesne as of an estate of
inheritance As in the Answer is truly Alledged, And we must say any other matter or

ginge in the saide Answeres Conteyned materiall or effectuall in the lawe to be replied unto And
not in his Replicacion sufficiently Confessed and Avoyded traduced or denied is true All which
matters his Complaynant is ready to averre and prove To his honorable Countes full Awards
and prayers as in his bill he hath prayed.