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To His Right Honourable Philip Lord Sandwich, Baron of Sandwich

Black Coy

W: Murray—

Sp. Gran Eld

The Defendant now call times hereafter having growing to himself all and all manner of Benefit and Advantage of Exception that may be had taken to many
 mutually inconsistent of and other Insufficiencies in the Complaint, said Bill of Complaint contained for Answer thereto or unto so much thereof as he is advised is material
 for him to make Answer unto He Answereth and saith That he admitteth by an Act of Parliament made in the eighth year of the reign of her late Majesty Queen Ann
 Intituled an Act for the Encouragement of Learning by Vesting the Copies of printed Books in the Author or Purchaser of such Copies during the time therein mentioned
 It was among other Things enacted to the Intent and purpose for that purpose set forth in the said Complaint, said Bill And this Defendant further Answereth and saith that
 he does not of his own Knowledge know nor can set forth whether the Complaint was not or is the sole Author and proprietor of such part of the Book in the
 Complaint, said Bill mentioned as purport to be Lotteries written by the complainant & addressed to the Reverend Doctor Swift Dean of St Pauls Church in the
 Kingdom of Ireland in the said Bill named bearing date the respective dates in the said Bill mentioned And this Defendant will he doth not know nor
 can set forth otherwise than as hereinafter is mentioned what the Complaint has ever disposed of his right therein to any person or persons or
 whether the Complaint hath the sole and absolute right of printing and reprinting sending or selling such Lotteries But this Defendant saith
 that all the Lotteries mentioned in the Complaint, said Bill of Complaint were as this Defendant verily believes actually sent & delivered by and to the several
 persons by whom & to whom they personally purport to have been written & disposed of the reason this Defendant is advised and Humbly Justifies that the Complaint
 is not to be considered as the Author & proprietor of all or any of these said Lotteries And this Defendant is also advised & Humbly Justifies that the said Lotteries are not worth of
 that Nature & sole right of printing whereof way is made or to be derived by the said Statute to the Author and his Assigns or Assigns But this Defendant
 doth admitt that he has printed or caused to be printed two hundred Copies only of the said Lotteries together with several other papers since the Title of some
 Swifts Literary Correspondence for Twenty four years from Dublin and seven hundred and fourteen to one thousand seven hundred and thirty two & is continuing to print
 to and from Mr Pope, Doctor Swift, Mr Gay, Lord Bolingbroke & Lotteries from Doctor Swift to the Duke and Bishops of Downsbury & others with explanatory notes and
 a Key throughout & which are subjoined first Philosophical Lotteries between Doctor Arbuthnot & Doctor Wotton, concerning the Deluge & the case of Marine Dodder dug out
 of the Earth second Capital Lotteries written in Latin from Bishop Horbury to Doctor Friend their election from Doctor Richeson all quine & concerning the climate of that Country
 fourth election from the late Barnham Goodloire to a Lady who had great Faith in fortune telling fifth Deane Swifts present case in verse sixth Epitaph for himself
 six Mr Pope printed for & sold in those Street Court Garden & Jackson in Saint Dunstons Street at Chappells in Grosvenor Street & Elcks under the Royal Exchange of
 which he has sold but upon Copies which were sold at the price of four shillings each to Gentlemen purchasers and three shillings and six pence to Booksellers But
 this Defendant hath been stayed in the sale of the rest of them by the Injunction of this Honourable Court and this Defendant further Answereth and saith that
 he never had any express or implied Authority to print or publish any of the Complaint, said Lotteries or any of the said Lotteries sent by the said Doctor Swift to the
 Complaint But this Defendant saith he is informed & verily believes that the said Lotteries were first printed at Dublin in the Kingdom of Ireland by Mr George
 Faulkner Bookseller there as it said by the direction of the said Doctor Swift to whom the said Lotteries written by the complainant were addressed by whom the said Lotteries directed to the
 Complaint were written of this Defendant believes and this Defendant is advised & Humbly Justifies that all persons in this Kingdom have a right to reprint such books as are first published
 in Ireland that such as are first published here may be lawfully reprinted in this Kingdom & this Defendant is informed & believes that the practice of the Booksellers in both Kingdoms
 hath been & is so to reprint this Defendant hath only reprinted the said Lotteries from the said Dublin Edition he is advised & Humbly Justifies he hath done nothing but
 what was lawfull for him to do And this Defendant saith that the third part of this Defendants said Book consists of pieces not before published composed by Doctor
 Arbuthnot Doctor Wotton Doctor Arbuthnot the late Bishop of Meath Baron Goodloire & Doctor Richeson some of which were given to & others purchased
 by this Defendant & in which this Defendant hath the sole property but that part of the said Book which the Complaint claims property in is no more than
 one fifth part of the said Book being but four sheets out of twenty of which the book printed by this Defendant consists And this Defendant does deny that he has made any
 agreement with any person or persons in relation to the printing of the said Edition of this Defendants Book or the profits arising there by or to the agreement made by this Defendant with the person
 who printed the same for this Defendant And this Defendant will that the Complaint is not intitled as he Humbly Apprehends and presumes to have any Account
 of profits from this Defendant for the reasons aforesaid But Humbly hopes that he shall be permitted to sell his said Book reprinted from the Dublin Edition of the
 said Lotteries as aforesaid And this Defendant denies all unlawful combination & conspiracy as the said Bill charged against him without that that there
 is any other matter or thing in the Complaint, said Bill of Complaint contained material or essential for this Defendant to make Answer unto or
 not how it and how by sufficient Answered unto Confessed or Denied Answered or Denied is true to his Knowledge & belief of this Defendant all
 which matters and things this Defendant is ready to prove as he shall be directed by the Court shall direct And Humbly prays to be heard & defended
 with his reasonable Costs and Charges in this behalf lawfully by him suffered

Orbaldo

J. B.

John Browning

Edw. Carr.