The wyght & Soverall Demurrer & Plea
and answeare of Richard Chamber & John
Howke & Bartholomew Gillman Defts
to the Informacon of
Sr Robert Heath Knight his mats
Attorney Generall.

The said Defendts by protestacon not acknowledg
or confessing any the matters or thinge wherewith
they are charged in and by the said Informacon to
true in such sort manner and forme as the same
are alledged & layd and every of them Joyntly &
Severally & Jointly and so much as concerneth himselfe said
that the said Informacon as to so much & soe
Condrneth the not payment of Custome or duti
or any Combinacon not to pay the same, and
bringing of Explayts out of the Downes suppos
to be contrary to the orders & ymmemorial Course
of the Court of Exchequer upon wch matters
or most part of the supposed misdemeano & offences
wherewith they stand charged by the said Info
con doe depend, as far as they concerne and are
informed by their Counsell they understand
insufficient in lawe to bee answered unto
first concerning the said Custome and duti
that by the said Informacon it is alledged
that the Marchants of this Realme doe and by
all the lawes of this mats Raigne and by the
of the Raignes of his most noble Progenito
and Queenes of this Realme allwayes and fro
from

time to time they have paid and ought to pay
certen moderate Customes and duties upon and
for goods & marchandizes exported and imported by
them out of and into this Realme charging them
by the said defendts that they plotted and combyned to
hinder and disturbe his mats Officers in taking &
receaving the aforesaid Customes and duties &
to change their goods and marchandizes to bee
Carryed away from the Ryver harbowes and
places where they should be cancelled without payt
or answearing to his matie any Customes or other
duties for the same not alledging or setting forth
by the said Informacon of what nature or kind
the said goods or marchandizes were for wch the said defendts
refused or sought to avoyde payt of Customes and
duties as it ought to have bene. And as it is not
alledged what the said goods are so it is not
sett forth what the Customes & other duties
supposed to bee due are as it ought to have bene
for unles it bee a Constant certayne duty the
Charge ought to have bene certayne, setting
forth how many in certainty was due for
Customes and duties and how it grows due
whether by consent and agreement of the
defendts or how otherwaies and for what goods
that so the defendts might have pleaded & put
to issue or to the Judgmt of the Court whether
so many or any thing had bene due or not, or

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