and your orator prays may make a part of this his Bill — your
orator further states that writs of Fieri Facias have issued upon
said judgments and the property of your orator has been levied by
virtue thereof and will be exposed to sale as by reference to exhibits
A. B. and D will more fully appear and which your orator prays
may make a part of his bill of complaint — your orator con-
further represent that the aforesaid judgments were obtained on account
and by reason of an alleged Trespass upon the premises of the said
John Williams, plaintiff at law, said to have been committed by
your orator, to which your orator plead not guilty and your
orator fully believes that he should have established his innocence
by shewing title out of the said Williams but for the unconscionable
and immoral conduct of the said Williams in tampering with
a particular and important witness on the part of your orator
on account of which the testimony from said witness was either
suppressed or prevented so that your orator was deprived of the benefit
thereof and at a stage of the trial at law when it was not in the
knowledge of your orator that he could avail himself of the same
testimony from another source and if known it would have been
impossible to have procured it in season — your orator is happy to
find that the singular injustice consequent upon the conduct of
the plaintiff at law can be remedied by testimony from other
witnesses to the same fact and which your orator has but
recently come to the knowledge of, and which will clearly in
the opinion of your orator shew that the said Williams acknow-
ledge that he had no right to any part of moores Change on
a part of which the alleged trespass was said to have been committed
but that of all the right which he ever had no part remained
that was wholly and entirely the property of William D. Allen having
at law by his conveyance to the said Wm. D. Allen during the life
time of the said Allen, and of the part in dispute if determined
in favor of the complainants under the survey of "Mc Kirtin" or "Arch
Change" he had no claim or have any claim, by which was

upon the intention of Williams to convey all his right and
which he had received an equivalent, of the said William D. Allen
as will the more fully appear by reference to the exhibits E. F. which
your orator prays may make a part of this his bill of complaint —
Your orator further states and expressly charges that John Williams
by an undue and improper influence over William W. Allen further
strengthened by a subsequent agreement between the said John Williams
and William W. Allen a certified copy of which agreement is herewith
exhibited marked G. and which your orator prays may make a
part of his bill of complaint, obtained from the said William W. Allen
the perusal and possession of the family papers including the title
papers of the said William D. Allen from among which your orator
has good reason to believe and does believe that the said Williams
took several papers important to the establishment of the title out
of John Williams, but your orator is unable to particularly
charge the specific papers so taken and disposed of: your orator
further states that he has good reason to believe that at the time
of executing the deed by John Williams to William D. Allen or
subsequent thereto that the said John Williams executed an instrument
whereby he obliges himself to convey and did release to William D. Allen
the land excepted by the deed aforesaid marked ~~xxxxx~~ F. in the exhibits
herewith and making a part of this bill, and which was then in dispute
between Isaac Dawson & Matthew Mills which instrument of
conveyance and release is recollected to have been seen by persons
within the cognizance of this Honourable Court among the papers
of William D. Allen since the decease of the said Allen and fully
justifies the assertion of John Williams that his interest of every
nature was conveyed to William D. Allen and his heirs — your orator
cannot charge in whose possession the aforementioned instrument of
conveyance is from Williams to William D. Allen but your orator
fully believes the same to be in the possession of William W. Allen or
John Williams whom your orator believes confederated and which
instrument your orator believes fully conveys and releases all and
every right to William D. Allen and his heirs which could in any