to one Abraham Leiter by deed bearing date the 19th day of August A.D. 1859, and recorded in Liber I.N. No. 4 folios 278 and 279, one of the Land Records of Washington County aforesaid to have and to hold the same unto the said Richard and his assigns from the thirteenth day of April then past for and during and unto the full end and term of fifteen years from thence next ensuing fully to be complete and ended by vertue of which demise the said Richard entered into the said tract or parcel of plantable land, with the appurtenances and was possessed thereof, and being so possessed thereof, the said John afterwards to wit, on the said day and year first aforesaid with force and arms that is to say with sticks and staves at the County aforesaid, entered into the said tract or parcel of plantable land with the appurtenances, which the said Joseph, John W., George T., Edward B., John D. and Eliza J. his wife, Mary E., Emma S. and Lydia had demised to the said Richard in manner aforesaid for the term aforesaid, which is not yet expired and ejected the said Richard from his said farm and other wrongs to the said Richard, then and there did to the great damage of the said Richard, and against the peace government and dignity of the State to wherefore the said Richard saith he is injured and hath sustained damage to the value of one hundred dollars and therefore he brings suit &c

William T. Hamilton
N. Mollet | Plaintiffs Attorneys

Sir. I am informed that you are in possession of a claim title to the premises in this declaration mentioned or to some part thereof, and I being sued in this action as a casual ejector, and having no claim or title to the same premises do advise you to appear in the Circuit Court for Washington County on the first Monday of March next by some Attorney of that Court and then and there by rule of the same Court to cause yourself to be made defendant in my stead, otherwise I shall suffer Judgment to

be entered against me and you will be turned out of possession

I am &c John Doe

To

Dr. William H. Grimes, Tenant in possession of the premises or some part thereof

February 17. 1866.

And now here on the first Monday of March being the 5th day of the same month in the year of our Lord one thousand eight hundred and sixty six, comes into Court here, the said Richard Roe, Lessee as aforesaid by his Attorney aforesaid and also the Sheriff of the County aforesaid, that is to say Jonathan Newcomer, Esquire, to whom a copy of the declaration and notice aforesaid, was in form aforesaid sent, returns the said Copy thereon endorsed to wit:

"Served" J. Newcomer, Shff.

Whereupon, the said Richard Roe, Lessee as aforesaid by his Attorneys aforesaid, prays that the said John Doe the defendant, the said Dr. Wm. H. Grimes, the tenant in possession of the said premises, or those, under whom he claims, to the declaration aforesaid, may appear: and thereupon the said Wm. H. Grimes by Richard A. Alvey Esquire in pursuance of the notice aforesaid comes into Court here, whereupon it is ruled by the Court here, with the consent of the said Richard Roe, Lessee as aforesaid, by his attorneys aforesaid, and the said William H. Grimes (who claims the title in question) by his attorney aforesaid, that the said William H. Grimes be admitted defendant in the place of the now defendant, John Doe the casual ejector, and that he immediately receive a declaration, and plead thereto the general issue, and at the trial thereon to be had the said William H. Grimes, shall appear in his proper person or by his attorney or counsel, and confess the lease, entry and actual ouster and expulsion of so much of the tenements in the declaration of the said Richard Roe, Lessee as