If there are several written contracts, say as to the first, after the word 'filed,' '*marked No.* 1,' repeat the complaint as often as there are contracts in the manner directed in section 5, page 52, distinguishing each contract by its number.

*Form of a Complaint in Debt on a Written Instrument.*

*Peter Plaintiff* complains that *Daniel Defendant* is indebted to him by virtue of the written instrument, a copy of which is herewith filed, as will appear thereby, and has neglected to pay said debt.

All which the said plaintiff is ready to prove.

PETER PLAINTIFF.

See last note.

*Form of a Complaint in Debt on a Written Instrument, where the debt does not appear on the face of the Instrument alone.*

*Peter Plaintiff* complains that *Daniel Defendant* is indebted to him by force of the written instrument, a copy of which is herewith filed; because he says that, [*insert facts necessary to establish the debt,*] and that the said *Daniel Defendant* has neglected to pay the said debt.

All which the said plaintiff is ready to prove.

PETER PLAINTIFF.

See two last notes.

N. B. The mere lapse of time bringing a debt due, is not a fact which renders it necessary to have recourse to the last form.

For the form of a complaint in debt on an open account, see section 8, page 52.

*Form of a Complaint in an Action of Specific Performance.*

*Peter Plaintiff* complains that *Daniel Defendant* contracted with him in the manner set forth in an instrument of writing, a copy whereof is herewith filed, and although the said *Peter Plaintiff* hath performed his part of the said contract, yet the said *Daniel Defendant* refuses to perform his part thereof in this, that is to say, [*state the acts or omissions complained of.*]

All which the said plaintiff is ready to prove; wherefore he prays judgment of specific performance of the said contract.

PETER PLAINTIFF.

See section 9, page 52.

*Form of a Complaint in Injunction.*

*Peter Plaintiff* complains that *Daniel Defendant* intends to [*state the act which it is intended to injoin,*] and that the said *Daniel Defendant* ought not to do the said acts, which he intends to do as aforesaid, because the said plaintiff says that [*insert the facts or circumstances which are relied upon as the ground of the injunction.*] All which the said plaintiff is ready to prove; wherefore he prays that the said *Daniel Defendant* may be enjoined to abstain and desist from doing the said acts which he intends to do as aforesaid.

PETER PLAINTIFF.



*Peter Plaintiff* makes oath according to law, that the facts stated in the above complaint, are true to the best of his knowledge and belief.

Sworn before HENRY HONEST,
Justice of the Peace.

*Form of a Complaint in Replevin.*

*Peter Plaintiff* complains that *Daniel Defendant* detained one pair of oxen belonging to the said plaintiff, being the same replevied in this action. All which the said plaintiff is ready to prove.

PETER PLAINTIFF.

*Form of a Complaint in Ejectment, on the Possession of the Plaintiff.*

*Peter Plaintiff* complains that he was possessed of a certain piece of land, of the following description, [*insert description,*] and that *Daniel Defendant* unlawfully detains the said land from him. All which the said plaintiff is ready to prove.

PETER PLAINTIFF.

*Form of a Complaint in Ejectment on the Possession of another.*

*Peter Plaintiff* complains that *George Grantor* was possessed of a piece of land of the following description, to wit, [*insert description,*] that the title of the said *George Grantor* hath lawfully come to him, the said plaintiff, and that *Daniel Defendant* unlawfully detains the said land from him. All which the said plaintiff is ready to prove.

PETER PLAINTIFF.

*Form of a Complaint in Ejectment for Dower.*

*Priscilla Plaintiff*, widow of *Peter Plaintiff*, complains that she was married to the said *Peter Plaintiff*; and that the said *Peter Plaintiff* is dead, and that during the marriage, the said *Peter Plaintiff* was possessed in absolute property of a certain piece of land of the following description, [*insert description.*] By means of all which the said *Priscilla Plaintiff* is entitled to dower in the said land, which dower *Daniel Defendant* unlawfully detains from her. All which the said plaintiff is ready to prove.

PRISCILLA PLAINTIFF.

Page 41, sec. 13.

*Form of a Complaint in Ejectment upon Title.*

*Peter Plaintiff* complains that he is entitled to a piece of land, of the following description, [*insert description,*] by virtue of a deed herewith

Maryland Historical Society

The Maryland State Colonization Society Papers

XIII. Colonization Pamphlets

1. The Declaration of Rights,
The Constitution of the
State of Md. in Liberia
(rough draft, engrossed copy, printed copy)