Form of a Complaint in Damages to Real Property not in actual possession of the Plaintiff.

Peter Plaintiff complains that he was possessed of a piece of land of the following description, that is to say, [*insert description,*] and rented the same to *Richard Rentor*, for a term of —— years, that during the said term, and while the said *Richard Rentor* was in possession of the said land, under the said renting, *Daniel Defendant* came upon the said land and cut down —— trees, by means whereof the said plaintiff hath sustained damage. All of which the said plaintiff is ready to prove.

PETER PLAINTIFF.

Page 54, sec. 19.

Form of a Complaint in Damages to Personal Property.

Peter Plaintiff complains that he was possessed of [*or owned,*] a pair of oxen, and that *Daniel Defendant* took the same out of his possession, *and still detains them*, whereby he hath sustained damage. All which the said plaintiff is ready to prove. PETER PLAINTIFF.

Form of a Complaint in Damages for Injuries to the Domestic Relations.

Peter Plaintiff complains that *Daniel Defendant* beat *Philip Plaintiff*, the son [*or servant*] of said *Peter Plaintiff*, so severely that the said *Philip* was unable to render to the said *Peter* his accustomed services, as by reason of the relation subsisting between them, he ought to do, whereby the said plaintiff hath sustained damage. All which the said plaintiff is ready to prove. PETER PLAINTIFF.

N. B. *The above forms of complaints are only models or specimens, and may be changed or modified, or new ones invented upon similar principles, to be used in cases not herein provided for.*

Form of an Answer denying the Facts of the Complaint.

Daniel Defendant denies the truth of all the allegations in the complaint of *Peter Plaintiff*, against him. DANIEL DEFENDANT.

Form of an Answer, denying the legal right of the Plaintiff to recover, and also denying the truth of the facts alledged in the complaint

Daniel Defendant, says that supposing all the allegations, contained in the complaint of *Peter Plaintiff* against him, to be true, yet the said *Peter Plaintiff* has no legal right to recover against him in this action,* and he also denies the truth of all the allegations contained in the said complaint. DANIEL DEFENDANT.

The words after the asterisk (*) are to be omitted when it is intended to admit the facts.

Specimen of an Answer shewing new facts, constituting two defences.

Daniel Defendant denies the right of *Peter Plaintiff* to recover in this action, because he says that after the occurring of the facts stated in the complaint, it was agreed between the said *Daniel Defendant* and the said *Peter Plaintiff*, that the said *Daniel Defendant* should give, and the said *Peter Plaintiff* receive ——— dollars, in satisfaction of the injury complained of in the said complaint, and that the said *Daniel Defendant* hath actually paid, and the said *Peter Plaintiff* received the said sum of money.

And also because the injury complained of in the complaint, was committed, and the cause of action accrued more than ——— years before the commencement of this action.

All which the said defendant is ready to prove.

DANIEL DEFENDANT.

Form of an Answer alledging Payment.

Daniel Defendant denies that *Peter Plaintiff* is entitled to recover in this action against him, because he says that he hath paid the debt in the complaint mentioned, to the said *Peter Plaintiff*. And this the said defendant is ready to prove. DANIEL DEFENDANT.

Form of an Answer alledging Performance of a Contract.

Daniel Defendant denies that *Peter Plaintiff* is entitled to recover against him in this action, because he says that *he* has performed whatever he was required to perform, by virtue of the contract, in the complaint mentioned. And this the said defendant is ready to prove.

DANIEL DEFENDANT.

If the defendant be only a surety or the defendants be several, sued together, for the default of one, instead of *he*, in *italics*, say *the said Daniel Defendant*, or whatever else may be the name of the party charged with a default.

Form of an Answer alledging Illegality of Consideration.

Daniel Defendant denies that *Peter Plaintiff* is entitled to recover against him in this action, because, he says, that the contract in the complaint mentioned, had relation to the slave-trade, in this, that it was a contract to furnish rice to a vessel employed in the slave-trade, and that the parties to the contract well knew that such was the case. And this the defendant is ready to prove. DANIEL DEFENDANT.

Form of an Answer relying on lapse of time.

Daniel Defendant denies that *Peter Plaintiff* is entitled to recover

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)