the deceased his heirs and Assigns shall and will warrant and forever defend by these presents (the rents and services which from hence forth shall grow due and payable to the Chief Lord or Lords in respect of his or their Seigniorie or Seigniories only excepted and foreprized" as by a copy of the said Deed hereto annexed and to which your Orators pray leave to refer, and that the same may be taken as part of this their Bill of Complaint may more fully appear — Your Orators further shew that the said Deed executed by the said Lawand Trueman to the said James Trueman, was by some accident never recorded pursuant to the directions of the Act of Assembly, and some time after the execution thereof, the aforesaid Lawand Trueman died leaving Benjamin Trueman the Defendant herein after often named, his heir at Law, being the Eldest son of the said Lawand Trueman — Your Orators also shew that the said James died sometime in the year seventeen hundred and forty three having first made and executed his last Will and Testament and thereby devised the said bargained premises to — Thomas Trueman the father of Your Oratrix Ann Magruder Somerville, in fee, as by the said Will now remaining on the Records of the State, and to which Your Orators pray leave to refer will more at large appear — And Your Orators further shew that the said Thomas Trueman last named was the heir at Law of the said James Trueman who died without issue leaving Henry Trueman his Eldest brother, of which Henry the said Thomas was the Eldest son, And Your Oratrix Ann Magruder Somerville is the only daughter and heiress of the said Thomas Trueman who died some time in the year seventeen hundred and seventy seven, with which said Ann Magruder, Your Orator James Somerville before named intermarried some time in the year seventeen hundred and eighty three.

Your Orators further shew unto Your Honor that the said bargained premises though described in the deed of the said Lawand Trueman to be part of Blackwell, and in fact part of the aforesaid tract called Blackwell, and part of another tract called Anthony's Choice, but by some mistake in the Deed of the said Lawand Trueman they are said to be part of Blackwell, without any mention of the said tracts called Thomas and Anthony's Choice tho' the bounds and limits in said Deed comprehend and include part of both the said tracts — Your Orators further shew that the said Benjamin Trueman [illegible] and sets up a title to the said bargained premises

as heir at Law of the said Lawand Trueman pretending that the said Deed executed by the aforesaid Lawand Trueman his father is invalid by reason of its not being recorded though the said Benjamin was frequently applied to by Thomas Trueman Your Oratrix's father in his life time and requested to execute a good and effectual conveyance of the said bargained premises that the same might be recorded, and the defect aforesaid aided, and the said Thomas Trueman, father of Your Oratrix in his life time being willing to avoid unnecessary litigation, and to settle the matter with the Defendant in an Amicable manner, proposed to refer the dispute to the final Award and determination of indifferent persons to be nominated for that purpose, which was acceded to by the said Benjamin Trueman and Charles Somerset Smith, Joseph Sim, William Bowie and Henry Tubman Esquires were appointed Arbitrators for that purpose and the said Thomas Trueman father of your Oratrix, and the said Defendant mutually passed bonds to each other for the due performance of the Award of the said Arbitrators, and the following is a copy of the Bond executed by the said Defendant "Maryland to wit, Know all Men by these presents that I Benjamin Trueman in the County of Prince Georges planter am held firmly bound unto Thomas Trueman of the said County planter in the sum of five hundred pounds Sterling Money of Great Britain to be paid to the said Thomas Trueman his heirs Executors Administrators and Assigns to which payment well and truly to be made, I bind myself my heirs Executors Administrators and Assigns firmly by these presents Sealed with my Seal and dated this third day of December Anno Domini one thousand seven hundred and seventy — The Condition of this Obligation is such that if the above bounden Benjamin Trueman his heirs Executors and Administrators and every of them do and shall in all things well and truly stand to obey, abide by, perform, fullfil, and keep, the Award, Order, Arbitrament, final end and determination of Charles Somerset Smith, Joseph Sim, William Bowie, and Henry Tubman Esquires Arbitrators indifferently named, elected and chosen as well on the part and behalf of the above bounden Benjamin Trueman, as of the above mentioned Thomas Trueman, to Arbitrate, Award, order, Judge, and determine of and concerning two tracts of land to wit Thomas and Anthony's Choice, and Blackwell if the Award be against the above bounden Benjamin Trueman then he the said Benjamin Trueman is to give a good and sufficient Deed [illegible]