of his right and Interest and profits and Stock in the lands and premises aforesaid and furnace and forge aforesaid the said Jacob Giles carried on and worked the said lands and premisses furnace and forge in Lancaster County aforesaid to the expiration of the lease aforesaid on the twenty ninth day of June in the year seventeen hundred and sixty five, as of his own property excluding as well the said John Giles and Nathaniel Giles as your Orator from any right title or share therein and from the twelfth of March seventeen hundred and fifty six the date of your Orators bond to the twenty ninth day of June seventeen hundred and sixty five the expiration of the said lease the said Jacob Giles made profits therefrom upwards of thirty thousand pounds Current Money, Your Orator further sheweth to your Excellency that in the settlement aforesaid made on the said twelfth day of March there are many considerable errors and particulars in the Articles of one hundred and fifty pounds Current Money which your Orator was charged with as his proportion of a debt due to Michael Rice and Gorhard Brenner for Talpahaken forge whereas Your Orator doth expressly allege that he had before that time settled and paid the same and also Your Orator was wrongfully charged upon the said settlement with one hun=dred and twenty nine pounds ten shillings and one penny half penny as his pro=portion of the Talpahaken forge balance when in fact there was no such balance upon a fair settlement of Accompts your Orator further sheweth to your Excellency that in the said settlement your Orator was charged with three hundred and thirteen pounds eleven shillings and one penny half penny as his proportion of desperate debt, and that the said Jacob Giles hath since collected the same or Obtained satisfaction by some means or other, And your Orator after passing his bond aforesaid for the balance aforesaid wrongfully and fraudulently made out against him as aforesaid by the said Jacob Giles to keep peace with the said Jacob Giles and to prevent a suit on his said bond upon the request of the said Jacob Giles assisted as Clerk for him in his private affairs from that time till very lately and annually made large and considerable payments towards satisfaction of the said bond amounting to upwards of fourteen hundred pounds Current Money and seventy pounds Sterling Money, an Account whereof your Orator delivered to the said Jacob Giles and a Copy whereof is herewith into Court brought and which your Orator prays may be taken as part of his Bill of Complaint, and a balance still remains unpaid upon the said bond, which the said Jacob Giles demands of your Orator and has repeatedly threatned to sue your Orator for the same Your Orator further sheweth unto your Excellency that the said Peter Dicks mentioned as aforesaid some time ago died in Pennsylvania having first made and [illegible] his Will (to Wit) in the said Province which is there recorded and [illegible] Administration with the Will annexed have been since [illegible] Orator by the [illegible] Prenifary General of this Province, and that the [illegible] Giles is also dead [illegible] letters of Administration have been [illegible] said Nathaniel Giles upon the goods and Chattels rights and [illegible] said John Giles, and that the said Nathaniel Giles hath taken [illegible] of the said Administration, and tho' Your Orator hath [illegible] Nath[illegible] Giles to be a party in this Bill of Complaint

as well in his own right as Administrator of the said John Giles, yet the said Nathaniel Giles hath hitherto always refused to doe the same, And your Orator further sheweth to your Excellency that your Orator hath repeatedly demanded a settlement with the said Jacob Giles upon the partnership aforesaid and an Acc. of profits, and hath also in a friendly manner from time to time requested the said Jacob Giles to correct the Errors as aforesaid and to give up your Orators bond fraudulently passed as aforesaid and to reimburse with Interest the Moneys so as aforesaid paid by your Orator. But so it is May it please your Excellency the said Jacob Giles confederating and com=binding with the said Nathaniel Giles how to deceive and defraud your Orator hath hitherto always refused the same pretending and giving out in speeches that no such profits were made and that no such Errors have happened or fraud committed, which actings and doings of the said Jacob Giles are against conscience and equity and Mani=festly tend to the great damage and prejudice of your Orator in tender consideration whereof, And for as much as your Orator is remediless in the premisses by the Ordinary course of proceedings without the aid and assistance of this Honorable Court, to the end therefore that the said Jacob Giles may true Answer make to all and singular the premises as fully and particularly as if the same were here again repeated and inter=rogated, and may set forth whether Peter Grubb was not seized in fee as alleged — and whether he did not make such lease at the time for the term and to the persons herein before particularly mentioned, Whether they did not enter and were possessed as alledged, Whether Daniel Walker did not afterwards die in the Province of Pennsyl=vania intestate, Whether George Churchman did not make such purchase at the time, of the persons and in the manner as set forth, Whether George Churchman did not afterwards in the year seventeen hundred and forty nine or seventeen hundred and fifty or at any other and what time dispose of part of his right and Interest to Abra=ham Hare of the province of Pennsylvania, Whether Abraham Hare George Churchman and Peter Dicks were not intitled to and possessed of the whole right and Interest in the lease aforesaid, Whether afterwards in the year seventeen hundred and fifty or at any other and what time the said Hare Churchman and Dick did take and receive the said Jacob Giles, John Hall and your Orator into Partnership, and Whether Articles of Agreement and Copartnership were not on the thirteenth day of November seventeen hundred and fifty or at any other and what time agreed and executed between them, Whether the Articles sett forth were not the same as is alledged to be made and executed, Whether by Virtue of the said Articles a Partnership was not formed and Whether the said Defendant Jacob Giles, John Hall and your Orator did not enter and were possessed as equal partners and joint [illegible] Abraham Hare, George Churchman and Peter Dicks as alledged, Whether [illegible] said furnace and forge were not put in Order and repaired [illegible] great [illegible] and [illegible] =ings and considerable sums of Money [illegible] in lasting re[illegible] forth — Whether the said Defendant Jacob Giles, John Hall [illegible] died not furnish, Hare, Churchman and [illegible] with the loan [illegible] pounds Current Money of Pennsylvania [illegible] or any other [illegible]