his confederates are contrary to equity and good conscience and tend to your Oratrixes apparent wrong and injury. In tender consideration whereof and forasmuch as your Oratrix is altogether remediless in the premises by the strict rule of the common law and cannot have any discovery or relief touching the matters and things aforesaid without the aid and assistance of this honorable Court, where matters of account and redemption of estates are properly cognizable and relievable. - To the end therefore that the said Henry and his Confederates (when discovered) may upon his and their corporal oaths (to the best of his and their remembrance, knowledge and belief) true perfect and direct answers make to all and singular the matters and things aforesaid, as fully as if the same were here again repeated and they thereunto particularly interrogated and more especially, that the said Henry Pratt may set forth in what manner and how the said George Baynard became indebted to him and may exhibit a particular account thereof from the commencement of their dealings to the death of the said George Baynard, shewing the sum now due and that he may enter into an account with your Oratrix, before an auditor appointed or to be appointed by your honor, and that your Oratrix may be at liberty to redeem the said mortgaged premises and negroes, and that the said Henry Pratt, upon your Oratrix's paying to him what shall appear to be due to him upon an audit to be taken under the direction of this Court, which your Oratrix hereby offers to pay, that thereupon the said Henry Pratt may reconvey, and reassign to your Oratrix the premises and negroes aforesaid, free and clear of all incumbrances done by him, or any claiming by, from or under him; and that your Oratrix may have and receive such further and other relief in the premises, as the nature of this your Oratrix's case doth or may require and as to your honor shall seem agreable to equity and good conscience. - May it please your honor to grant to your Oratrix the State of Maryland's writ of Injunction to the said Henry Pratt, his agent or Attorney and to the Clerk of the General court of the State of Maryland for the Eastern Shore of maryland, directed, commanding them and each of them to stay all further proceedings in the premises until the pleasure of this Court be known and to grant to your Oratrix the states Writ of Subpena to the said Henry Pratt, directed commanding him on a certain day and under a certain pain therein to be inserted personally to be and appear before your honor in this honorable court, then and there upon his corporal oath, true and perfect answer to make to all and singular the premises and further to stand to and abide such order and decree therein as to your honor shall seem meet and your oratrix shall pray and is of right. -

Cecil County to wit. John Scott for Compt.

On the fourteenth day of September in the year seventeen hundred and ninety six appeared before me, the Subscriber one of the state of Marylands Justices of the peace for the county af.d Rachel Baynard

and made oath on the holy Evangels of Almighty God that the several facts stated in the within bill as of her own knowledge are true as therein stated and that those stated as of the knowledge of others she believes to be true. -

Sworn before Lambert Beard.

Queen anns county to wit. On the records of Queen anns county among other things is contained the following Viz.t: Queen anns county to wit. on the twenty fifth day of October anno domini seventeen hundred and eighty seven, the following deed or condition was brought to be recorded, to wit: -

This Indenture made this twenty fourth day of October in the year of our Lord seventeen hundred and eighty seven. Between George Baynard of Queen Anns county in the State of Maryland Gentleman of the one part and Henry Pratt of the same place merchant of the other part. Witnesseth that the aforesaid George Baynard for and in consideration of seven hundred and thirty eight pounds lawful current money of the state aforesaid to him in hand paid by the aforesaid Henry Pratt, at and before the sealing and delivery of these presents the receipt whereof the said George doth hereby acknowledge and from every part thereof doth exonerate acquit and discharge the aforesaid Henry Pratt his heirs executors and administrators forever hath given granted bargained and sold aliened, enfeoffed released conveyed and confirmed and by these presents doth give grant, bargain and sell, alien enfeoff, release, convey and confirm unto the said Henry Pratt his heirs executors administrators and assigns forever all that part of a tract of land called "Relief" containing by estimation five hundred and seventy six acres, all that part of a tract of land called Baynards pasture containing by estimation one hundred and one acres, and all that part of a tract of land called Roes Chance containing by estimation ninety seven acres be the same and every of the same parcels of land; more or less of all which said parcels of land and every part of every of them the aforesaid George Baynard now lawfully and rightfully stands seized and possessed in his own right, by the last will and testament of his late father George Baynard and other mesne conveyances all lying on the branch of Tuckahoe creek in Queen Anns County together with all houses, out houses gardens, orchards, fences, trees, woods underwoods ways, waters, water courses, meadows, meadow grounds, rights members hereditaments and appertenances unto the same parcels of land and every of them belonging or in anywise appertaining and the reversion and reversions, remainder and remainders, rents issues and services thereof and of every part and parcel thereof and all the estate, right title, interest, use, trust, possession claims and demands of him the said George of in to or out of the same lands and tenements hereditaments and premises and every part and parcel thereof either in law or equity, and also the negro slaves hereafter named to wit one negro man slave named Pompey one other named David or Davy one other named Anser, one other named James,