Isaac for the work labour and services done performed and rendered in manner last aforesaid reasonably deserved to have would well and truly content and pay to him the said Isaac whensoever after he the said James should be thereunto requested and the said Isaac doth in fact aver that he reasonably deserved to have from the said James other one thousand eight hundred and six pounds current money for the work labour and services done performed and rendered in manner last aforesaid whereof the said James afterwards to wit upon the day and year last aforesaid at the County of Baltimore aforesaid had notice And whereas afterwards to wit upon the day and year aforesaid at the County of Baltimore aforesaid the said James Jaffray was indebted to the said Isaac McPherson in the further sum of one thousand Eight hundred and six pounds current money of Maryland for sundry articles properly chargeable in account as by a particular account thereof hereunto annexed reference being thereunto had will appear and being so indebted he the said James in consideration thereof afterwards to wit upon the day and year aforesaid at the County of Baltimore aforesaid assumed upon himself and then and there faithfully promised the said Isaac that he the said James would whenever after he should be thereunto requested well and truly content and pay to the said Isaac the said last mentioned sum of money And whereas also afterwards to wit on the day and year first aforesaid at Baltimore County aforesaid the said James Jaffray accounted together with the said Isaac McPherson touching and concerning divers sums of money to the said Isaac before that time due and then being in arrear and unpaid and on the said account the said James was then and there found in arrear to the said Isaac in the sum of one thousand Eight hundred and six pounds current money of Maryland and being so found in arrear he the said James in consideration thereof then and there assumed upon himself and to the

said Isaac faithfully promised that he the said James would well and truly pay unto him the said Isaac the said last mentioned sum of money whensoever he the said James should be thereunto afterwards requested Nevertheless the said James Jaffray not at all regarding his said several promises and undertakings so as aforesaid made but intending the said Isaac McPherson in this behalf craftily and subtilly to deceive and defraud the aforesaid several sums of money or any of them or any part thereof he the said James to him the said Isaac altho often requested hath not paid but hath hitherto entirely refused and still doth refuse to pay the said several sums of money or any of them to the said Isaac over any manner to content him for the same to the damage of the said Isaac McPherson of three thousand pounds Current money of Maryland and therefore he brings suit &c

John T. Mason for Plaintiff.

Pledges to prosecute John Doe & Richard Roe

A copy of which said declaration was made and sent with the said Writ to the Sheriff of the County aforesaid thereon Endorsed To be served on the defendant with the writ or left at his place of abode twenty days at least before the return of the said Writ for plea or Judgment the first Court At which mentioned second Tuesday of October being the tenth day of the said month in the year of our Lord one thousand seven hundred and ninety seven and the day of the return of the aforegoing writ comes into the General Court here the said Isaac McPherson by his Attorney aforesaid And the Sheriff of Baltimore County aforesaid to Wit Henry Stevenson Gentleman to whom the said aforegoing writ was in form aforesaid directed makes return thereof to the Court here thus endorsed to Wit Cepi Copy served 14th September H. Stevenson Shff

And the said Henry Stevenson Sheriff of Baltimore County aforesaid although solemnly called upon by order of Court here on motion of the said Isaac McPherson by his Attorney aforesaid to bring into Court here the body of the