whole personal Estate of the Said James Philips the Elder and Saith and alledgeth as above & intends to prove &c.

4: Item She Saith & alledgeth that the Said James Philips the Younger in his Lifetime owed Several Debts that were outstanding due to the Said James Philips the Elder & particularly, of Thomas Larkin thirty, forty or fifty Thousand Pounds of Tobacco or some other very Large quantity and never did exhibit any Inventory or Account thereof or of other the personal Estate of the Said James Philips the Elder into the Registry of this Court nor make any distribution thereof which he ought to have done according to the express directions & true intent & meaning of the Said James Philips the Elder and alledgeth and intends to prove &c.

5 Item She alledgeth & intends to prove that the Said James Philips the Younger died some Years Since and that the Said Johanna as Exec.tr of his Testament or Adm.tr possessed her self of all the personal Estate of the Said James Philips the Younger and that Aquila Hall after the Death of the Said James intermarried with the Said Johanna and by vertue of that marriage possessed himself of the personal Estate of the Said James Philips the Younger which was more than Sufficient to Satisfye this Libellant and all others their Just Demands and that the Said Aquila Hall and Johanna his Wife have detained and substracted and still do detain and substract from this Libellant her Just part & portion of her said Father's personal Estate and refuse to pay the Same or any part thereof to this Libellant contrary to all Justice and Honesty and the true intent & meaning of her Said Father & intends to prove &c.

Item 6 And she Saith and alledgeth that the Said Aquila Hall & Johanna his Wife live in Baltimore County in the Province of Maryland and consequently are Subject to the Jurisdiction of this Court and that all & Singular the Rules and Assertions herein before mentioned are true and notorious and that publick fame thereof doth labour and alledgeth as above and intends to prove &c.

Whereupon due & Sufficient proof being made in behalf of the Libellant She prays that right and Justice to be administred to her in all and Singular the premises and that they the Said Aquila

(Hall

Hall and Johanna his Wife may be compelled to answer distinctly and articulately hereto, And that, you the Honble Judges by Your Sentence definitive and final Decree to be made & pronounced in this behalf the Sd Aquila Hall & Johanna his Wife may be made & compelled to render a true & perfect Account upon their personal Oath of all the Said James Philips the Elder's personal Estate which has hitherto come to the hands possession or knowledge of the Said James Philips the Younger to their hands possession or knowledge to this Libellant & satisfye & pay to her her Just proportion of the Same according to the intent & meaning of the Testator, And be condemned in Costs of this Suit made & to be made, and to the payment of the Same, this Libellant reserving to her Self liberty and power of adding diminishing and correcting this Libell if afterwards and when there shall be occasion so far as &c. —

P Dulany pro Libellant

Whereupon the Said Martha Daca hath his Lordships Writ of Citation to her granted directed to the Sheriff of Baltimore County commanding him to cite & Summons the Said Aquila Hall & Johanna his Wife that they be and appear &c. to Answer the premises aforesd returnable to the Second Tuesday of September then next. —

At which Said Second Tuesday of September being the 18th Day of the Same Month Anno Dom 1725 and the Day of the return of the Precept aforesaid comes again the Said Libellant by her Procurator aforesd and the Sheriff of Baltimore County to whom the Same Citation was directed likewise comes and makes return thereof to the Court here endorst

Served & Libell delivered 18th Augst

Wm Smith Shff

And the Said Aquila Hall & Johanna his Wife by Edmund Jennings Gent their Procurator appear and thereupon this Cause is continued untill next Court and the Same Day is given to the Libellant and Libellees also —

At which Said next Court to wit the Second Tuesday of

(November