P.L. Samuel Lee and Mary his Wife
& Blanch Hall
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P.H. Sarah Hall . . . . . } Libel and Answer

Be it Remembered that

on the 4th day of July 1763 The Libellants Samuel Lee & Mary his Wife and Blanch Hall exhibited their certain Libel and complaint against Mrs Sarah Hall which follows in these words Viz.t

To the Honourable Stephen Bordley Esquire Commissary General and Chief Judge for Probate of Wills and Granting of Administrations within this Province of Maryland

The Libel and Complaint of Samuel Lee and Mary his Wife and Blanch Hall Humbly Complaining shew to your Honour that Edward Hall late of Baltimore County deceased died in the Month of June in this present Year Seventeen hundred and Sixty three without Children leaving your Libellants Mary and Blanch his Sisters and Sarah Hall his Widow the only legal Representatives of the said Deceased seized of Divers Lands and Tenements in Fee Simple and possessed of personal Estate to considerable Value

Your Libellants also shew to your Honour that some Time in or about the Month of December seventeen hundred and sixty one the said Edward Hall unfortunately fell from an Horse got greatly hurt and bruised particularly in his Head whereby his Skull was fractured or otherwise so greatly wounded that he was greatly subject to fits ever afterwards to his Death and was always from the Time of that fall in a State of Stupification or Raving generally totally deprived of his Memory and Rational Faculties and though there was at some Times seeming Reflection yet his Memory and Reason was vastly impaired and weakened —

Your Libellants likewise shew to your Honour that after the said Fall and in the weak Estate of Mind and Body that the said deceased was in he was as your Libellants have been informed prevailed on by the Artful Insinuations and reiterated undue Persuasions and Solicitations of his Wife the aforesaid Sarah Hall the Respondent hereinafter after named to execute some Writing which the Libellants pray she may be Compelled to bring into this Honourable Court in the Form of a Will greatly in Favour of the said Sarah his Wife who was to have been a considerable Devisee and Legatee thereby and upon the Execution thereof the said Respondent Sarah took the same into his Custody and Keeping and ever hath the same in her Hand. And that afterwards he Executed another Paper purporting to be his last Will and Testament containing several Devises and Bequests of the whole or chief Part of his Real and Personal Estate to the said Wife your Libellants Mary and Blanch and some others and entrusted the same to the Care and Keeping of John Hall of Kensington of Baltimore County who now hath or lately has the same in his Hands and Custody

Your Libellants further shew to your Honour that afterwards and a very few Days before the said deceased's Death the said Sarah the Widow most unfairly to gain almost the whole of the deceased's Estate Real and Personal whilst he was lying in the weakest and most helpless Condition totally deprived of Reason and Memory and hourly expected to expire importuned the deceased to make another Will in her Favour practised every false Art to induce him thereto and craftily endeavoured to win him to her purpose by a Profusion of the utmost seeming Tenderness and by these her Female Persuasions and continual Importunity at length prevailed with the said deceased