bounded Locust Post Containing three hundred thirty and five Acres of Land more or less And also all that Parcel of Land being part of a Parcel of Land called Tibbals in the County afsd Beginning at a marked Oak standing by the side of a Creek called Tersons Creek upon the East side of the said Creek and running up the said Creek South West and by West One hundred Perches to a marked Oak by a line drawn from the said Oak South East three hundred and twenty Perches so running North East and by East One hundred Perches and by a line drawn North West three hundred twenty and five Perches untill it come to the first marked Oak Containing and laid out for two hundred Acres more or less which he Claims as his Right and Inheritance and into which the same Andrew Pearce had no Entry but after the Disseisin which Hugh Hunt thereof unjustly and without Judgment made to the same Isaac within thirty Years then last past &c. and whereof the said Isaac Complaines that the said Andrew Pearce Dofsed him and unless the same Andrew should do the same and the said Isaac should make him Secure of Prosecuting his Clamour then he should Summon by good Summoners the said Andrew that he should be to appear before the Justices of his Lordships Provincial Court the Second Tuesday of September then next and that he the said Sheriff should have then and there that Writ &c.

At which said Second Tuesday of September to wit the 10th day of the same Month Anno Dom 1751. being the day of the return of the aforegoing Writ comes the said Isaac Freeman in his Proper Person and the Sheriff of Kent County to whom the same Writ was directed likewise comes and makes return thereof to the Court here thus Endorsed Viz.

Pledges pro. { John Doe, Richd Roe }

Summoners. { John Penn, Wm Penn }

Jno William Sonr Sher Kent Cty

To which aforegoing Writ was Annexed the following Man. of Attorney Viz.

Maryland ss. Andrew Pearce of Kent County doth hereby put in his place James Tilghman Attorney at Law in the Provincial Court of Maryland afsd in a Plea of Land at suit of Isaac Freeman In Witness whereof he hath hereunto set his hand & Seal this 20th day of August Anno Dom 1751

Andrew Pearce (Seal)

J. Tilghman

The above Power of Attorney was Executed and Acknowledged by the above Named Andrew Pearce before me one of his Lordship Justices of the Provincial Court of Maryland the day and Year above Written

J. Tilghman

Maryland ss. Isaac Freeman of Kent County Planter in his Proper Person Demandeth against Andrew Pearce of the same County Planter all that Tract or Parcel of Plantable Land called Marshy Point lying and being in Kent County afsd Beginning at a Bounded Locust Post standing on the East side of the Mouth of a Creek of Sassafras River formerly called Tartsons Creek being the place

(where)

where the Original beginning Cedar stood and running from the said Post South East three hundred and six Perches which comes to a Creek called Cornwallis Creek mentioned in the Original Grant then down with the same North nineteen Degrees East forty two perches then North fifty eight Degrees East forty Perches then East twenty perches then North twenty perches then North fifty eight Degrees East twelve perches then North thirty six Degrees East thirty two Perches then North thirty six Degrees West thirty six Perches, then North thirty six Degrees East six Perches then South sixty five Degrees East thirty eight Perches then North four Degrees East eighteen Perches then North sixty two Degrees West twenty Perches then North fifty five Degrees East twelve Perches then South sixty six Degrees East twenty perches then North five Degrees East thirty two Perches then North fifty eight Degrees East fourteen Perches which comes to the Point at the Mouth of the Creek mentioned in the Original Grant being the place where the Second Bounds then North fifty six Degrees West seventy Perches then North thirty four Degrees West Ninety Perches then North Seventy nine Degrees West fifty two Perches then South fifty nine Degrees West nine Perches which comes to the Gum mentioned in the Original Grant on a Point by a Marsh on the River side where now stands a fair Antient Bounded Gum then South thirty three Degrees West Twenty two Perches then South twenty seven Degrees West seventy eight Perches which comes to a little Creek mentioned in the Original Grant then South thirty three Degrees East One hundred and sixteen Perches then South sixty eight Degrees West eight Perches then North sixty six Degrees West forty Perches then North sixteen Degrees West twenty two Perches then North twenty five Degrees West forty four Perches then North fifty six Degrees West sixteen Perches then South sixty five Degrees West twenty eight Perches then West twenty eight Perches then North forty eight Degrees East forty Perches then North six Degrees West forty Perches to a Point by the River at the little Creeks Mouth being the place where the Chestnut stood as mentioned in the Original Grant then North fifty Degrees West twenty Perches then West eighteen Perches then with a straight line to the beginning bounded Locust Post Containing three hundred thirty and five Acres of Land more or less with the Appurtenances thereunto belonging And also All that other Parcel of Land being part of a Parcel of Land called Tibbals Beginning at a marked Oak standing by the side of a Creek called Tersons Creek upon the East side of the same Creek and running up the said Creek South West and by West One hundred Perches to a marked Oak by a line drawn from the said Oak South East three hundred and twenty Perches so running North East and by East One hundred Perches and by a line drawn North West three hundred twenty five perches untill it come to the first marked Oak Containing and laid out for Two hundred Acres of Land more or less with the Appurtenances thereunto belonging as his Right and Inheritance and into which the same Andrew hath no Entry but after the Disseisin which Hugh Hunt thereof unjustly and without Judgment made to the same Isaac within thirty Years now last past &c.

And Whereupon the same Isaac saith that he was Seized of the afsd Three hund. & thirty five Acres of Land and two hundred Acres of Land with the Appurtenances in his Demesne as of Fee and Right in the time of Peace &c. in the time of the Lord the King that now is by taking the Profits thereof to the Value of &c. and into which &c. and therefore he bringeth this Suit &c.

(And)