December Term 1830.

the said William I Maddox, and from which said Decree the said William I Maddox appealed to the Court of Appeals here, the tenor of which said record of proceedings is in form following towit:

Saint Marys County towit. At a County Court of the State of Maryland for the first Judicial District, sitting as a Court of Equity begun and held at Leonard Town on the first Monday of August being the sixth day of the same month in the year of our Lord one thousand eight hundred and twenty seven, and in the fifty second year of the Independence of the United States of America.

Were Present

The Honble | John Stephen Esquire Chief Judge / Edmund Key & / John R Thomas | Esquires Associate Judges.

Jo. Harris Clk.

William Williams Esq Shff.

In the record of proceedings of the said Court amongst others were the following towit.

William I Maddox
ag[t]
Henry G I Key. Henrietta H Key his wife & John Taylor.

Be it remembered that heretofore towit, on the sixth day of September in the year of our Lord one thousand eight hundred and twenty four, came into the Court here William I Maddox by Gerard N Causin his Solicitor and exhibited his Bill of Complaint against a certain Henry G I Key, Henrietta H Key his wife and John Taylor in the words and of the tenor following towit:

To the Honorable the Judges of Saint Marys County Court acting as a Court of Equity. Humbly complaining sheweth unto your Honors, your Orator William I Maddox of Saint Marys County, that your Orator on or about the eleventh day of November eighteen hundred and twenty purchased of a certain Henry G I Key of Saint Marys County a Lot of ground with the improvements and appurtenances thereunto belonging lying and being in Leonard Town, Saint Marys County and agreed to give to the said Henry G I Key for the same the sum of three thousand dollars current money, provided the said Henry G I Key on or before the first day of January eighteen hundred and twenty four should convey to your Orator his heirs and assigns a good, pure absolute estate in fee simple in said Lot and the improvements and appurtenances thereunto belonging as by the said Henry G I Key's bond of conveyance for the said Lot of ground with the Improvements and appurtenances thereunto belonging to the said William I Maddox herewith filed marked exhibit A and which your Orator prays may be taken as a part of this his Bill of complaint will more fully appear. Your Orator further states that the said Henry G I Key has recovered judgment against your Orator in the Court of Appeals for the amount of the purchase money for said Lot of ground with the Improvements and appurtenances thereunto belonging as more fully appears by a copy of said judgment herewith filed marked exhibit B and which your Orator prays may be taken as a part of this his Bill of complaint

December Term 1830.

That subsequently to the sale of the said Lot of ground and its improvements to your Orator, your Orator has been informed and verily believes, that at the time of the said sale the said Henry G I Key the Vendor had not the legal estate in said Lot of Ground and its improvements, but that the same was then and now is vested in a certain John Taylor of the City of Washington District of Columbia in trust for the said Henry G I Key and Henrietta H Key his wife and their heirs, or the survivor of them, and your Orator further respectfully states that he has been informed and verily believes that the legal estate in said Lot of ground and its improvements was conveyed by the said Henry G I Key the Vendor to the said John Taylor for the purposes aforesaid previous to the sale aforesaid to your Orator. That the said John Taylor resides out of the State of Maryland and beyond the Jurisdiction of this Court. In tender consideration whereof, and for as much as your Orator is remediless in the premises by the strict rules 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 such matters are cognizable and relievable, to the end therefore that the said Henry G I Key and Henrietta H Key his wife and John Taylor may upon their corporal oaths, true perfect and direct answers make to all and singular the matters and things aforesaid as fully as if the same were herein again repeated and they thereunto particularly interrogated and more especially that the said Henry G I Key may set forth whether when he sold the said Lot of ground and its improvements as aforesaid to your Orator he had not conveyed and assigned to the said John Taylor all his right title and interest in and to the same and whether a contract did not exist previously to the sale of the said Lot of ground and improvements to your Orator between the said Henry G I Key and the said John Taylor by virtue of which the said John Taylor became vested with the fee in said Lot of ground and improvements and appurtenances in trust for the joint use of the said Henry G I Key and Henrietta H Key his wife and their heirs and the survivor of them, and whether the said contract or Deed of trust is not now in existence, and that the said John Taylor may set forth whether previous to the eleventh day of November eighteen hundred and twenty a contract was not entered into between the said Henry G I Key and the said John Taylor by which the said Henry G I Key conveyed to him the said John Taylor in trust for the purposes aforesaid all his right and title of in and to the real property conveyed to the said Henry G I Key by his father Philip Key, which said property the said Philip purchased of the heirs of the late Richard Barnes, and whether the said contract or Deed of trust is not now in existence and in his possession, may it please your Honors to grant to your Orator the States writ of Injunction to be directed to the said Henry G I Key, the Clerk of the Court of Appeals for the Western Shore, the Sheriff of Saint Marys county and all others acting under his authority, commanding them and each of them to stay and enjoin all further proceedings at Law on the judgment aforesaid until the further order of this Court and to grant