Issued this 18th day of September Anno Domini 1818. William Scott, Clerk

At which mentioned third Monday of September being the twenty first day of the said month, in the year of our Lord Eighteen hundred and sixteen, and the day of the return of the foregoing writ, comes into the County Court here the said Isaac Freeman by Ezekiel F. Chambers and William Carmichael Esquires his Attorneys, and the Sheriff of Kent County, to wit, Ephraim Vansant 4th Gentleman, to whom the said foregoing Writ was in form aforesaid directed, makes return to the Court here thus endorsed to wit. Kent County sct. By virtue of this writ to me directed, I have taken the within named Edward Wright whose body I have ready before the County Court within named at the day and place within contained as I am within commanded. Ephraim Vansant 4th Shff. And the said Edward Wright being called appears in Court here by Henry Tilghman Esquire his Attorney, and the said Edward Wright by his Attorney aforesaid prays oyer of the original Writ of the said Isaac Freeman in this cause impetrated and he hath it as follows that is to say.

Kent County to wit. The State of Maryland to the Sheriff of Kent County Greeting. You are hereby commanded to take Edward Wright late of said County, if he shall be found in your bailiwick and him safe keep, so that you have his body before the County Court to be held at the Court House in the Town of Chester in and for the said County of Kent on the third Monday of September next to answer unto Isaac Freeman in a plea of Trespass on the case &c. Hereof fail not at your peril and have you then and there this Writ. Witness the Honorable Richard Tilghman Earle Chief Judge of the said County Court the 16th day of March Anno Domini 1818. Issued this 18th day of September Anno Domini 1818. Wm Scott Clk. At which time came and heard the said Edward Wright by his said Attorney, saving and reserving to himself all and all manner of advantage exception and allegation to the writ aforesaid prays leave of the Court here to imparle until the third Monday of March next, and he hath it, the same day is given to the said Isaac Freeman then &c. At which said third Monday of March being the fifteenth day of the same month in the year Eighteen hundred and nineteen until which day the said Edward Wright all and all manner of advantage exception and allegation being saved and reserved to him as to the writ aforesaid had leave to imparle comes as well the said Isaac Freeman, as the said Edward Wright by their Attorneys aforesaid, & the said Edward Wright still reserving to himself all and all manner of advantage, exception & allegation to the writ aforesaid prays leave of the Court here further to imparle until the third Monday of September then to answer to the Writ afs.d and he hath it, the same day is given to the said Isaac Freeman then &c. At which said third Monday of September being the twentieth day of the month in the year Eighteen hundred & nineteen until which day the said Edward Wright all and all manner of advantage exception & allegation being saved and reserved to him as to the writ aforesaid had leave further to imparle comes as well the said Isaac Freeman, as the said Edward Wright by their Attorneys afs.d And thereupon the said Edward Wright by his said Attorney prays that the said Isaac Freeman may declare against him the said Edward Wright in the plea aforesaid; whereupon it is ruled by the Court here, that the said Isaac Freeman declare against the said Edward Wright in the plea aforesaid, and if the said Isaac Freeman doth not declare against the said Edward Wright in the plea aforesaid judgment will be rendered against him by default. And the said Isaac Freeman by his said Attorney declares against the said Edward Wright in the plea aforesaid as follows that is to say. Kent County sct. Edward Wright late of said County was attached to answer unto Isaac Freeman in a plea of Trespass

5. on the case and so forth. And whereupon the said Isaac by W.m Chambers his Attorney saith that whereas the said Isaac before and at the time of the committing of the grievance of by the said Edward as herein after mentioned was, and from thence hitherto hath been and still is lawfully possessed of a certain Farm and Plantation with the appertenances thereto belonging, situate lying and being in the County aforesaid, and by reason thereof the said Isaac during all the time aforesaid ought to have had, and still of right ought to have a certain way from and out of the said farm and plantation unto, into, through and over a certain close in the said County aforesaid, and from and out of the same unto and into a certain public Road or Highway in the County aforesaid, and so back again from the said public Road or Highway unto and through and over the said close, and from and out of the same unto and into the said farm and plantation of the said Isaac to go, return, pass and repass, with his servants, horses, carts, waggons and carriages to places of publick worship to Mills, Market Towns, publick Ferries and Court Houses, every year and at all times of the year at his and their free will & pleasure, yet the said Edward well knowing the premises but wrongfully and unjustly contriving and intending to injure the said Isaac in that behalf, and to deprive him of the use & benefit of his said way, whilst he, the said Isaac was so possessed of his said farm and plantation, with the appurtenances aforesaid, to wit, on the first day of January in the year of our Lord One thousand eight hundred and sixteen, and on divers days and times & 6. between that day and the day of issuing forth the original writ in this cause, at Kent County aforesaid placed and erected and caused and procured to be placed and erected divers large quantities of boards, plank wood and earth, in and across the said way, and kept and continued the said boards, planks and earth, so placed and erected in and across the said way as aforesaid; and also the said other wood, timber and earth in the same way as aforesaid for a large space of time, to wit, hitherto, and thereby during all the time aforesaid the said way was, and still is greatly obstructed and stopped up, and the said Isaac by means thereof could not during the time aforesaid, or any part thereof, nor can he now have or enjoy his said way, as he of right ought to have done, and otherwise might and would have done, and hath been and is by means of the premises, deprived of the use benefit and advantage thereof, to wit, at the County aforesaid, whereupon the said Isaac saith he is injured and hath damage to the value of five thousand dollars current money and therefore he brings suit &c.

Ezekl F. Chambers Plffs atty. Pledges &c. Jno. Doe & Rd. Roe.

7. And thereupon the said Isaac Freeman by his Attorney aforesaid prays that the said Edward Wright may answer to the declaration of him the said Isaac Freeman in the plea aforesaid; whereupon it is ruled by the Court here that the said Edward Wright answer to the declaration of the said Isaac Freeman in the plea aforesaid and if the said Edward Wright doth not answer to the declaration of the said Isaac Freeman in the plea aforesaid, judgment will be rendered against him by default. And the said Edward Wright by his said Attorney defends the force and injury when &c. and saith that he is not guilty of the said Trespass in manner and form as the said Isaac Freeman, above against him hath complained, and of this he puts himself upon the Country &c. and the said Isaac Freeman in like manner &c. Whereupon for trying the issue aforesaid it is ordered by the Court here, that twenty persons from the panel of petit jurors returned to the Court here by the Sheriff of the County aforesaid be drawn by ballot according to the Act of Assembly in such