commences the first claim of said John Williams to any part of the Widows Change & the many deaths among others interested in the same (26) and consequent distribution and destruction of papers has rendered it almost impossible for your orator to obtain; although he has been at great trouble and expence in the research, and at length has obtained a true and correct statement of all the facts and circumstances necessary to establish his innocence in the alledged trespass by clearly shewing title out of John Williams, one of the defendants hereto or an insufficient title for the maintaining an action of trespass — Your orator would further state that Jane Strawbridge died about the year of our Lord 1790. seized of "Widows Change" Conveniency Addition, Little, Less and Least as was supposed, that she left the following named persons, heirs at law viz John Williams, James Williams, Sarah Williams the wife of William Porter, Mary Williams, the wife of Elijah Willis, Nancy Williams, Elizabeth Williams & Amelia Williams, representatives of James Williams decd Levin Layfield, James Layfield Priscilla Layfield wife of William Speaden, and William Layfield representatives of Hannah Layfield deceased, Mary Thomas alias Stevens, Sarah Thomas, Levin Boston, and James Boston, representatives of Sarah Boston deceased, that on the 18th day of May anno Domini 1790. on petition filed by John Williams one of the heirs at law above named, and one of the defendants hereto a Commission was issued from Somerset County Court directed to John C Wilson James Wilson Jun, John Stewart & Samuel Smith and Henry James Carroll, agreeably to the act to direct descents in this State as by reference to exhibit B B. will more fully appear, and which or such parts of which as may be essential to the interest of your orator is prayed to be taken as a part of this bill of Complaint. — Your orator would humbly represent that previous to the Commission as referred to, in exhibit B.B. William Davis Allen entered into a Contract of Marriage with Polly Strawbridge the widow of Doctor William Strawbridge the immediate ancestor of Jane Strawbridge, as by exhibit C.C. will more fully appear, and which is prayed to be taken as a part of this bill of Complaint, which contemplated marriage was immediately solemnized, that by this marriage William Davis Allen became entitled to the right of Dower of his said wife in the lands of her former husband Dr. Wm Strawbridge the same not being excluded in the marriage contract &c. — Your orator would further represent that the said William D Allen after the aforementioned marriage and death of Jane (27) Strawbridge resolved to purchase the estate Doctor Wm Strawbridge had in Widows Change, Conveniency, Addition, Little, less and Least, which the heirs being numerous were desirous of disposing of, that for this end the said William D Allen purchased the rights of many of the heirs taking in some cases bonds of conveyance, in others quit claims deeds, many of which bonds have either been lost or destroyed being superseded by report of Commissioners as in B.B. but among which your orator has found a bond from John Williams dated July 28th 1794 wherein the said John Williams obligates himself to make a good & sufficient deed to all his right title interest and claim of him the said John Williams of and into all the six several tracts of land herein before named, and which was formerly owned by Doctor William Strawbridge and which the said John Williams took among others as heir to Jane Strawbridge, all which is more fully exemplified by the original bond filed with the Bill of Complaint and marked E. a copy of which marked E is herewith exhibited as part of this Bill of Complaint — Also your orator by exhibit D.D. which is prayed to be taken as a part of this bill shews fully that William D Allen in his lifetime viz on the 26th day of July 1794 purchased the right or part of the land before mentioned six tracts of land, so as aforesaid descended of Levin Layfield which was fully paid to the said

Levin Layfield by John Porter & Polly his wife on the 22d day of August 1801 long after the deed from John Williams to Wm D Allen — Also by exhibit E.E. which your orator prays may be taken as a part of this his Bill of Complaint, a full and perfect release or quit claim of all the right title of Sarah & William Porter to the aforementioned six tracts of land so as aforesaid descended is made to Wm D Allen his heirs &c. By many of the other heirs of Jane Strawbridge now living & to be found your orator cannot obtain, except by authority of this Honorable Court it can be fully shewn that William Davis Allen purchased separately from all or nearly all of the heirs of Jane Strawbridge all their several rights and claims which was accounted for in consideration of the deed from John Williams to William D Allen as by exhibit F filed with the bill to which this is a supplement, a copy of which, marked F is herewith — and prayed to be taken as a part of this bill of Complaint. — Your orator would further represent, that on some few of the Heirs refusing to sell their claims upon reasonable terms a writ of (28) commission was prayed in the name of John Williams as may be seen by exhibit B.B. herein before referred to although the right of John Williams was extinguished by the bond as per exhibit C. herein before referred to, yet, inasmuch as William Davis Allen took by purchase, he could not in right of the deed made him make election to take the whole estate of the said Jane Strawbridge if the Commissioners reported that the same would not divide &c. for a purchase of an undivided right of an estate from one of the heirs does not entitle the purchaser to such election on writ of Commission, although the purchase be made of him who might himself have so taken, hence your orator infers which is most true that the name of John Williams was thus inserted to perfect the title agreeably to his bond, as seen by exhibit C, herein before referred to, was principally paid to the heirs severally by the said William D Allen himself and not to John Williams who was a mere nominal agent or actor in the transaction without present or future interest, and that by his "John Williams" bond and deed as per exhibits E & F to William D Allen he the said Williams is forever estopped, both in law and equity from all right, title, claim or interest which he may have had to all the lands descended to him, among others, as heir of Jane Strawbridge known by the names of Widows Change, Conveniency, Addition, little, less and least — Your orator would further humbly state, that the herein before named Commissioners as per exhibit B.B. herewith proceeded according to law and after having made survey and examined as to such lands as descended to Jane Strawbridge clear of dispute, and of which she died seized so clear of dispute, the said Commissioners proceeded to estimate the same, rejecting that part of Widows Change whereon the alledged trespass was said to have been committed &c. because that part of Widows Change was claimed by one Matthias Miles Senr in his location of a tract of land called "Cole Rain" at the time of the meeting of said Commissioners & was also claimed by the Patentee of Bowen Warren both of whom urged their claims before said Commissioners all which can be (29) be fully proven by Col John C Wilson the only surviving Commissioner named in the said Commission as herein before stated. Your orator would moreover state that the said John Williams did elect to take the same lands as estimated by the Commissioners, which included so much of Widows change as was clear of dispute and no more, and which said lands so as aforesaid estimated were conveyed by deed from John Williams to William D Allen as by Exhibit F herein before mentioned also, rejecting that part of Widows Change then in dispute in the same manner as done by the aforesaid Commissioners, all which could be more fully exemplified from the additional returns & statement of the said Commissioners going to confirm the statements of Col John C Wilson one of the Commissioners aforesaid, but for the circumstance of the said additional return having been mislaid in the office of the Clerk of Somerset County as by the