Your Complainant further states that the said Littleton Robins in his lifetime informed your Complainant that he had taken and received into his possession the Silver plate mentioned in the said bill of Sale for which the said Mortgage debt ought to have been credited, but which your Complainant believes has never been done - Your Complainant also believes that a large quantity of grain and pork was delivered and paid over to the said Littleton Robins by the said John Dennis Senr. in his lifetime and just before his death which ought to have been credited to the said Mortgage debt.

Your Complainant also states and charges that the said James B Robins did deceive and impose upon your complainant by inserting in the said Bond a larger sum as the Mortgage debt due from the said John Dennis Senr. to the said Littleton Robins than was actually and bona fide due as such and that he included in the said sum of three thousand five hundred and twenty dollars mentioned in the Condition of the said bond a certain debt due to a certain David Ball from or on account of the said John Dennis the Nephew of your Complainant amounting to $160.81. which your Complainant believes was no part of the said Mortgage debt and he is altogether unacquainted how or in what manner the same became due - that he did not intend to give his bond for more or any other sum of money than the balance of the said Mortgage debt due from the said John Dennis his brother and that he signed the said bond without reading the same fully confiding in the integrity and representations of the said James B Robins. - Your Complainant further states and charges that the said James B Robins Exor of the said Littleton Robins well knowing the premises hath instituted a suit on the said bond passed by your complainant for the recovery of a supposed balance and at April Term 1822, recovered the said Judgment at law against your Complainant as stated above whereas your Complainant verily believes that in equity and good Conscience nothing is due upon which said judgment your Complainant is liable to an execution unless prevented by this Court.

In tender Consideration whereof and to the end that a writ of Injunction may be granted on the said judgment directed to the said James B Robins Executor of Littleton Robins and to the Clerk and Sheriff of Dorchester County commanding them to stay and surcease all further and other proceedings on the said Judgment until the further order of this Court - that the said James B Robins Executor as aforesaid may be compelled specifically to perform and carry into effect the said Contract and agreement and account with your Complainant for all the said personal estate mentioned in the said Bill of Sale and for all the issues and profits thereof, which the said Littleton in his lifetime, and the said James since his death have or might have received but from their own default and neglect, and which your Complainant hath lost by their neglect and refusal to perform the said Contract - Also that the said James B Robins by a decree of this Court may be compelled to exhibit and bring into this Court all the books papers and accounts of the said Littleton Robins relative to the said Mortgage debt or any other debt due from the said John Dennis Senr. to the said Littleton Robins and also the said bond passed by the said James B Robins to your Complainant and if the same cannot be produced that he be compelled on oath to declare its contents and date and in what manner and upon what conditions and terms he obtained the possession of the same bond and how the same has been disposed of since, also that the said James B Robins be compelled upon oath to declare at what time and for what amount the said real estate was sold, who was the purchaser, at what time the purchase Money was paid and to whom, also that he be compelled to state on Oath particularly the balance of the Mortgage debt due from the said John Dennis Senr. to the said Littleton Robins on the 28th of October 1814. at the time the said bond was given by your Complainant and also the agreement and contract between him the said James and your Complainant relative to the said bond and also at what time Exhibit No 5. was executed and acknowledged, and also that your Complainant may have such further and other relief in the premises as the nature of his case merits and deserves.

May it please your honors to grant unto your Complainant the State of Maryland a writ of Injunction and also writ of Subpoena directed to the said James B Robins Executor of the said Littleton Robins commanding him to be and appear in this Court and answer the several matters and things herein before stated particularly and fully, and that he stand to and abide by such decree or order in the premises as shall or may be made in the premises.

Josiah Bayly for Complainant.

Dorchester County to wit, on the 17th day of April in the year of our Lord eighteen hundred and twenty two the within named Robert Dennis Complainant personally appeared before me the subscriber one of the Justices of the peace for Dorchester County and Made Oath that the several facts matters and things stated in the foregoing and within Bill of Complaint are true as therein stated and set forth to the best of his knowledge.

Sworn before Henry Clift —

The Record whereof mention is made in the aforegoing bill of Complaint in Hæc verba in the following words and figures, towit, In the records and proceedings of Dorchester County Court it is enrolled as follows towit, Dorchester County towit, At a County Court of the state of Maryland held for Dorchester County aforesaid at Cambridge in the said County on Monday the first day of April in the year of our Lord eighteen hundred and twenty two before the honorable William Bond Martin and his Associate Judges of the same County Court duly Commissioned and sworn, of whom were present, The Honorable William Bond Martin Chief Judge, James B Robins, William Whittington Associate Judges

Solomon Kirwan Esquire Sheriff. E. Richardson Clk. —

James B Robins Exor of Littleton Robins. vs Robert Dennis.

Comon and was given to the Sheriff of Dorchester County on the third day of August in the year of our Lord eighteen hundred and twenty that he should take Robert Dennis late of Dorchester County Yeoman if in his bailiwick he should be found and him in his custody should safely keep so that he should have his body before the Judges of Dorchester County Court to be held at Cambridge in said County on the fourth monday in October then next following to Answer unto James B Robins Executor of the last will and testament of Littleton Robins deceased of a plea that he render unto him the full and just sum of seven thousand dollars current Money which unto him he owes and from him he unjustly detains and so forth, and that he should have then and there that writ. At which mentioned day towit, the said fourth Monday in October eighteen hundred and twenty came here into Court the said James B Robins by Benjamin W Lecompte his Attorney and Thomas Benewood the Sheriff of the County aforesaid to the Court here made return that he had taken the body of the said Robert Dennis and the same had ready according to the exigence of the said writ. And the said Robert Dennis by Josiah Bayly his Attorney came here into Court, And thereupon day is given as well to the said James B Robins as to the said Robert Dennis by the Court here until the first Monday in April then next following. At which day towit the said first Monday in April eighteen hundred and twenty one here came again as well the said James B Robins as the said Robert Dennis by their Attornies aforesaid. And the said James B Robins by his Attorney aforesaid affiled his declaration in the plea aforesaid against the said Robert Dennis in manner and form following that is to say. Dorchester County towit, Robert Dennis late of Dorchester County Yeoman was summoned to answer unto James B Robins Executor of the last Will and testament of Littleton Robins deceased of a plea that he render unto him the full and just sum of seven thousand dollars current money which unto him he owes and from him he unjustly detains and so forth. And whereupon the said James by Benjamin W Lecompte his Attorney says that the said Robert on the twenty fourth day of October in the year of our Lord eighteen hundred and fourteen at the County aforesaid by his certain writing obligatory acknowledged himself to be held and firmly bound unto the said Littleton in his lifetime in the said sum of seven thousand dollars Current Money to be paid to the said Littleton when afterwards he should be thereunto required. Nevertheless the said Robert although often required the said sum of money or any part thereof to the said Littleton in his lifetime, or to the said James since the death of the said Littleton or either of them hath not rendered or paid, but the same to the said Littleton in his lifetime, or to the said James since his death to render or pay hitherto altogether hath refused and still doth refuse to pay the same to the said James to the damage of the said James fourteen thousand dollars Current Money and therefore the said James brings his suit &c. And brings here into Court as well the writing obligatory aforesaid sealed with the seal of the said Robert which testifies the debt aforesaid in form aforesaid the date whereof is the same day and year aforesaid as the letters testamentary of the said Littleton, whereby it sufficiently appears that the said James is the executor of the testament and last will of the said Littleton and hath execution thereof &c.

Benjamin W Lecompte Atty for Pltff. John Doe & Richard Roe, pledges &c. —

The writing obligatory whereof mention is made in the aforegoing declaration ensues as follows, towit,

Know all men by these presents that I Robert Dennis Senr. of Dorchester County State of Maryland am held and firmly bound to Littleton Robins in the sum of Seven thousand dollars to which payment I bind myself my heirs executors and Administrators by these presents sealed with my seal this 24. of October A Domini 1814. Now Condition of the above obligation is such that if the above bound Robert Dennis his executors Administrators or Assigns the sum of Three thousand five hundred and twenty dollars with legal Interest from the date hereof in the following installments towit, seven hundred dollars with the interest on the whole sum at the expiration of one Year, and the sum of seven hundred dollars at the expiration of the second year and so on annually until the whole sum be paid up which is