expressly states that when the arbitrators named in said document had the dispute mentioned therein before them, that the said Complainant attended before them and had an opportunity and availed himself thereof of using and employing every means in his power to prevent an award being made by said Arbitrators in favor of this defendant for that part of the tract of land called Widows Change for a trespass upon which the recovery was had in the action referred to and mentioned in exhibit marked A. and this defendant further states that by virtue of the authority vested in said arbitrators, an award was made out by said arbitrators in favor of this defendant for the said part of the tract of land called Widows Change, as by exhibit marked D and herewith filed and which this Defendant prays may be taken as a part of this his answer will fully appear by which the title of this defendant to the said part of Widows Change as against William W. Allen was fully established: this defendant also admits the existence and authenticity of the exhibits marked E & F but in making this admission this defendant expressly states, that when the exhibit E. was executed and delivered to William D. Allen he this defendant was entitled to only one fifteenth part of the real estate mentioned therein, and that when the exhibit marked F was executed and delivered to the said William D. Allen the exhibit paper marked E was deemed & considered by the said William D Allen and this Defendant as cancelled and of no avail, the said William D. Allen refusing to purchase that part of the tract of land called Widows Change upon which the trespass alluded to in exhibit A was proved to be committed, the same part being at that time in dispute: this defendant also states that the exhibit documents E. F. and G. were given and read in evidence to the Jury who tried the action of trespass referred to in exhibit A. This defendant denies receiving from William W. Allen any title paper relating to said William W. Allens lands, for this defendant expressly states that he never gave to William D. Allen any other instrument of writing in relation to the lands mentioned in the exhibit E & F save the said documents, nor was there ever any other contract in reference thereto entered into between this defendant and said William D. Allen: this defendant cannot help the belief of the Complainant, but this defendant does not believe that he is involved in, or in any way bound to notice or deny any belief of the complainant that certain documents or papers are in existence

in relation to the lands before mentioned, and in the hands of some imaginary person or persons not in the power of said Complainant to identify — all which matters and things this Defendant is ready to aver and prove as this Honorable Court shall direct and award, and humbly prays that the injunction granted in this cause may be dissolved and to be hence dismissed with his reasonable costs and charges in this behalf most wrongfully sustained

Josiah Bayly. E. K Wilson for deft.

State of Maryland Somerset County Sct: Be it remembered that on this twenty seventh day of November in the year of our Lord eighteen hundred and twenty one personally appeared John Williams the defendant named in the above and aforegoing answer before me the subscriber one of the Justices of the peace of the State of Maryland for Somerset County, and made oath upon the Holy Evangely of Almighty God that the several facts and statements in said answer are true

Sworn before Isaac M. Adams

Exhibit D. referred to in the said answer to wit: Whereas a dispute and difference of opinion have arisen between John Williams of Worcester County and William W. Allen respecting the title of a part of a tract of land called "The Widows Change", a tract of land called "Little", one other tract of land called "Lep", and one other tract called "Least" lying and being in Somerset County, and by their certain agreement in writing bearing date 7th day of February 1820 submitted the said dispute and difference to the decision and arbitrament of Ephraim K. Wilson, Josiah Bayly and George Harvey (of George) Esquires as by reference thereto will more fully appear: Now be it Known that we the subscribers having taken upon ourselves the execution of the said power, and the said parties having previously had notice of the time and place of our meeting and in pursuance thereof, and on the nineteenth day of May in the year eighteen hundred and twenty we met at Princess Anne at Mr. Whitelocks Tavern and having read the several title papers and having heard and examined the several proofs and allegations of the parties we do award, adjudge and determine that the said William W. Allen is not entitled to any tract of the said lands not included in a survey made by William D. Allen called Allens Vale and that the said John Williams is