complaining States and expressly charged that the said John Williams by an undue and improper influence over William W. Allen further strengthened by a subsequent agreement between them illustrated by Exhibit G herewith filed and making a part of said Bill of Complaint obtained from the said William W. Allen the perusal & possession of the family papers, including the title papers of the said William D Allen to his lands &c. from among which your orator has good reason to believe and do charge his belief of said Williams having taken therefrom several papers important in shewing title out of John Williams— your orator complaining States himself to be unable to charge the specific papers so taken or disposed of— Your orator complaining further States that he has good reason to believe that at the time of executing the deed by John Williams to William D. Allen or subsequent thereto, that the said John Williams executed an instrument whereby he obliged himself to convey and did release to William D. Allen the lands excepted by the deed aforesaid marked F herewith and making a part of said Bill of Complaint, and which was then in dispute between Isaac Harris & one Matthias Hiles, which instrument of conveyance and release is recollected to have been seen by persons within the cognizance of this Honorable Court among the papers of the said William D. Allen since the decease of the said Wm D. Allen, which clearly coincides with the confessions made by said John Williams that his right &c was extinguished to the widows change & by his own act— your orator could not charge in whose possession the said mentioned instrument of conveyance was from John Williams and to the said William D. Allen, but your orator states his belief that the same was in the possession of William W. allen or John Williams whom your orator states, that in his belief were confederates in the business: and which said instrument of conveyance your orator states that in his belief fully conveyed and released all and every right & claim to William D. Allen and his heirs which could in any possible manner accrue or attach to John Williams to the part of Mrs. change now claimed by said Williams all which said actings and doings your orator states were contrary to equity and good conscience and tends greatly to the prejudice and injury of your orator in the premises—

In tender consideration whereof, and for as much as your orator is remediless except in a court of Chancery, and to the end that the said John Williams upon his corporal oath should answer the complaints of your orator concerning the premises as fully and particularly as if the same were again repeated and he thereto especially interrogated, and moreover that your orator should not be unjustly deprived of his property by reason of Judgments which your orator stated were improperly and fraudulently obtained against your orator and that Executions issued thereon, your orator therefore prayed your Honor to grant unto your orator a writ of injunction upon the said judgments & Executions issued thereon to the said John Williams to the then Sheriff of Somerset County directed commanding to stay & surcease all further proceedings thereon, or otherwise until the further order of this Honorable Court, also your orator prayed that the State writ of subpoena to the said John Williams should be directed commanding him to be and appear in this honorable court on some day certain to answer &c. The facts of the bill were sworn to according to Law— your orator would further state that upon filing his said Bill of complaint the prayer thereof was granted, and injunctions issued & issued as also the defendant John Williams being duly served with process appeared and put in his answer to the said Bill of Complaint and obtained a rule to shew cause why said injunction should not be dissolved pending the rule &c to dissolve injunction, the plaintiff by petition marked A.A herewith exhibited, obtained leave of Court to amend his bill and make William W. Allen and William Whittington of Queen Anns county defendants; to which amendment to the said Bill of Complaint in this honorable Court exhibited against the aforesaid John Williams as also against William W. Allen and William Whittington the defendants; your orator states that he had filed his bill of Injunction in this honorable Court against John Williams who appeared and answered &c and your Orator further complaining do humbly represent that he believed William W. allen and William Whittington to be proper defendants with John Williams, to his said Bill of Complaint exhibited against the said John Williams as aforesaid, and your Orator therefore prayed that the said William W. Allen and William Whittington might be required to answer such parts of the said Bill of Complaint peculiarly against John Williams as of