as charges a conspiracy or secreting of papers necessary to shew title out of said John Williams to the forty five acres part of Widows change wherein the trespass was laid &c. Your Orator further discharge that he had good reason to believe and did believe that a release or bond of conveyance from the said John Williams whereby he the said John Williams did agree to make to William D. Allen a title in fee simple to that part of Widows change excepted in the deed marked F and exhibited as a part of your orators Bill of complaint, as well as to "little, lap and least" referred to in Exhibit E also taken as a part of said Bill of complaint which the said John Williams has not yet performed and done. your Orator further complaining in his said amended Bill did charge that from many circumstances, he was induced to believe the said bond or release was dated in the year of our Lord, one thousand seven hundred and ninety seven and purported to be a release or quit claim of him the said John Williams to any land owned by him called "Widows change", "convenience", "Addition", "little", "lap" and "least" and that the said Williams did thereby agree that a title as good his own should vest in William D. Allen his heirs or assigns if the same (then a part in dispute &c) should be divided as a part originally claimed by James Strawbridge the exertions of which paper was unknown to your orator before his trial at law &c. your Orator further states that he well hoped that such discoveries would have been made by the said John Williams concerning the allegations and charges as would altogether have shewn to your honors the great injuries and injustice done your orator in the premises. also your orator further complaining states that the said John Williams William D. Allen and William Whittington Defendants aforesaid combining and confederating together and to and with divers other persons at present unknown to your orator and whose names when discovered your orator prayed might be inserted therein and they made parties defendants with apt and proper words to charge them, and contriving how to injure and oppress your orator in the premises, some times pretend themselves ready to do justice to your orator by a fair and equitable adjustment of all disputes, and by fully shewing your orator in possession of all the facts & circumstances regard for the support of his claims and pretentions: But your orator did charge the contrary thereof to be the truth and that every endeavor is made to involve the whole subject in mystery and obscurity and to lead your orator into inextricable difficulties - all which actings and doings being contrary to equity and good conscience tend to the manifest injury of your orator in the premises. In tender consideration whereof and in as much as your orator was remediless in the premises except in a Court of equity your orator did conclude praying therefore that the said John Williams might put in his further answer, and with the said William Allen and William Whittington and the rest of the confederates when discovered may upon their corporal oaths full, true, direct and perfect answers make to all and singular the matters herein before stated and charged as fully and particularly as if the same were herein after repeated and they thereunto distinctly interrogated, and that not only to the best of their respective knowledge and remembrance but also as to the best of their respective and several information, hearsay and belief: and more especially that they should answer and set forth whether such or any bond of conveyance or quit claim as charged herein before from John Williams to William D. Allen his heirs or assigns, be not in the possession or knowledge or remembrance of these defendants or either of them, or have not heretofore been executed and perhaps since destroyed by these Defendants, or some one of them: if any such, what is or was the purport of the same, and when to be found. also praying that additional subpoenas for William N. Allen and William Whittington Defendants as aforesaid, be issued commanding them and each of them to be and appear in this Honourable Court on some day certain to answer the premises &c. also praying the Court to grant that the Injunctions before granted agreeably to the prayer of the bill to which this was an amendment might be continued until the same should be fully answered &c &c. The facts contained in the said amendment being sworn to before Wm Crockett Esquire a Justice of the peace of the State of Maryland for somerset County, the whole was filed with Clerk. Then came on the argument upon the Rule to shew cause &c when the Court ordered that the Injunction be dissolved.

and your Orator further complaining by way of supplement humbly represents that since the proceedings as herein before stated new and important matter concerning the premises has come to the knowledge of your orator, which by reason of the great length of time elapsed since the death of James Strawbridge whom commences the first claim of said John Williams to any part of the widows change & the many deaths among others interested in the same