and consequent distribution & distruction 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 heirs or an indisufficient title for the maintaining an action of trespass — Your Orator would further state that Jane Shawbridge died about the year of our Lord 1795 seized of Widow's chance, Convenience, addition, Title, Lep 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 and Amelia Williams, representatives of James Williams dec'd Levin Layfield James Layfield, Priscilla Layfield wife of William Dreaden & William Layfield representatives of Hannah Layfield deceased, Mary Furnis alias Stevens, Josiah Furnis, Levin Burton and James Burton representatives of Sarah Burton deceased, that on the 18th day of May Anno Domini 1795 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 B. Wilson, James Wilson Junior, John Stewart and Samuel Smith and Benj. James Carroll, dedimitably to the act &c to direct descents in this State as by reference to Exhibit B B will more fully appear and which, or such part 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 entred into a contract of marriage with Polly Shawbridge the widow of Doctor William Shawbridge the immediate ancestor of Jane Shawbridge as by exhibit b.b. will more fully appear and which is prayed to be taken as part of this Bill of complaint, which contemplated marriage, was immediately solemnized, that by this marriage ~~husband~~ William Davis Allen became entitled to the right of Dower of his said wife in the lands of her former husband Dr Wm Shawbridge the same not being excluded in the marriage contract b.b. — Your orator would further represent that the said Wm D. Allen after the aforementioned marriage and death of Jane Shawbridge

Shawbridge resolved to purchase the estate Doctor Wm Shawbridge had in Widows Chance, Convenience, addition, Title, Lep and Least, which the heirs being numerous, were desirous of dispersing of, that for this end the said Wm D. Allen purchased the right of many of the heirs taking in some cases bonds of conveyance, in others quit claim 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 and sufficient deed to all his right, title, interest & 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 Shawbridge and which the said John Williams took among others as heir to Jane Shawbridge, 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, sheweth that Wm D. Allen in his life time viz on the 28th day of July 1794 purchased the right or part of the same before mentioned six tracts of land so as aforesaid descended of Levin Layfield and which was fully paid to the said Levin Layfield by John Porter and 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 part of this his Bill of complaint, a full and perfect release or quit claim of all the right and title of Sarah & William Porter to the aforementioned six tracts of land to as aforesaid descended is made to Wm D. Allen his heirs — By many of the other heirs of Jane Shawbridge now living & document your orator cannot obtain except by authority of this honorable Court it can be fully shewn that William Davis Allen purchased seperately from all or nearly all of the heirs of Jane Shawbridge aforesaid their several right and claims which was accounted for in the 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