=sions of Stevenson & John Williams joined with his own hatred of the complainant upon supposition of wrongs received from said complainant, that he entered into the articles of agreement as illustrated by exhibit G. with the Complainants said Bill of complaint and that influenced by the hopes of revenge upon Guillet and the promises of reward from John Williams. This defendant gave John Williams an opportunity for examining the family papers including the title papers of his father William D'Allen and also suffered the said John Williams to take the Copy of the plott taken from the returns of the Commissioners upon the estate of James Shawbridge and two Bonds of conveyance one from Isaac Harris one from Matthias Miles, together with other plats and papers not now recollected but which the said John Williams assured this defendant would be essential in the prosecution of this complainant for trespass while the said John Williams was thus engaged in thus examining and taking the papers as aforesaid from this defendant Mrs Elizabeth Lowes the sister of this defendant came into the room and forbid the said Williams taking any of the family papers.- a struggle ensued by reason of the said Mrs Lowes endeavoured to wrest the papers from the said John Williams and in part succeeded by which some were damaged and each retained possession of a part of said papers.- This Defendant found among the papers of his father a bond from John Williams to William D. Allen a copy of which marked A is herewith files and prayes to be taken as part of this answer, which bond it is presumed is the same as charged in said complainants bill of complaint.- The said Bond was not dated in 1797 as charged in said complainants amended bill, but bears the same date as the deed from John Williams to William D. Allen.- This defendant admits that he did corresponde with John Williams for the purpose of taking an improper advantage of the Complainant, and for the keeping of given promises by John Williams, and that Joseph Stevenson was the agent, or is believed on the first negotiations of the parties against said Guillet.- The contract for submitting the matter of title &c to the arbitrament of Josiah Bayly Ephraim K. Wilson and George Handy Esqr the attornies for said John Williams was one fact which arose from this corporation and this defendant at the same time verbally agreed to keep all the papers yet

in his possession relating to the subject matter of the reference from the inspection of the referees with intention to procure such a decision from the said Arbitrators as would enable said Williams to prosecute an action of trespass against Peter Guillet with certainty of success in said Williams favour.- This defendant being young and ignorant of business did not fully comprehend the nature of the contracts until after the meeting of the arbitrators, nor did he enter into the second one without much solicitations and promises of reward from said John Williams.- This defendant in answer to the interrogatories admits that he has been informed by his family that his father purchased all the lands of John Williams which belonged to James Shawbridge, has heard that a part of Nicolls Grange a resurvey of Mehertie had been in dispute and that his father Wm D. Allen had negotiated bonds with all the claimants so that in any event he could secure the title, also has been informed, and do believe that the whole of Nicolls Grange belonged to the heirs of Wm D. Allen his father in as much as no dispute concerning any part there of ever came to the remembrance of this defendant. This defendant distinctly recollects to have frequently seen the original bond of which exhibit A hereto for reference to is a copy, many others have also seen the same papers but this defendant fearing some consequences might arise of a nature seriously to injure this defendant in the event of the paper being found in his possession after the contracts which had been made with John Williams and having forfeited by that alliance the confidence of his nearest friends he had no one to unbosom himself to or to whom he could apply for council, and knowing his sister one of whom the Complainant has married were frequently at his house and favourable to the interests of P. Guillett in the aforesaid transactions and knowing they were instructed by said Guillett to get hold of any papers in their power whereby he the said complainant could maintain his rights, this defendant took a copy of the bond collaterally given with the deed to Wm D Allen by John Williams & placed in his private pocket Book which is the same copy herein before referred to by Exhibit A, took the original, with the several plats & other papers not remembered as of less consequence and wrapped them up