which he now Holds. This Respondent submits the question of Law to your Honor whether the subsequent application for the benefit of the Insolvent Laws of Maryland by said Emory Riggin can impair the Bona fide title which he purchased without collusion from said Emory and this Respondent believes Explicitly that said Deed was not intended to operate as a Mortgage or deprive any of the Creditors of said Emory named the Respondent cognizance of any intended application for the benefit of the Insolvent Laws of Maryland at the time of this purchase said Emory Riggin. This Respondent having purchased said Lands and being unconscious with Fraud and denying most emphatically the charges of said Complainants Bill in that regard prays to be now dismissed with his reasonable Costs and Charges to be adjudged him,

Joshua P Horsey.

State of Maryland Somerset County sct Be it remembered that on this 27 day of December A.D. 1850 personally appeared Joshua P Horsey before me the Subscriber one of the Justices of the Peace of the State of Maryland for Somerset County aforesaid and made oath on the Holy Evangels of Almighty God that the facts herein recited are true to the best of his knowledge and belief.

Sworn Before, Thos J Dashiell,

Maryland Somerset County to Wit,

(Seal) The State of Maryland To Emory Riggin and Joshua P Horsey of Somerset County Greeting,

You are hereby commanded that all excuses set aside you personally appear before the Judges of Somerset County Court in Chancery sitting at Princess Ann on the 20 day of August next to answer unto the Complaint of Thomas Lord Henry Ward Joseph B Pinkney and John R Hall partners trading under the firm of Pinkney and Hall and William S Waters Trustee for the Creditors of Emory Riggin against you in the said Court exhibited. Herein fail not at your peril,

Witness The Honorable Ark Spence Chief Judge of our said Court this 5th day of July Anno Domini 1850.

Per order W. J. G. Polk Clk.

"Entered" Jonnson Severley"

Copy Docket Entries.

Thomas Lord Henry Ward Joseph B Pinkney and John R Hall partners trading under the firm of Pinkney and Hall and William S Waters Trustee for the Creditors of Emory Riggin

against

Emory Riggin and Joshua P Horsey

Bill in Chancery and Prayer Subpoena filed. Subpoena issued "June Session" 1850 Aug 20 Rule answer by the 4th day of May next.

Nov 28 Joshua P Horsey's answer filed.

Nov 28 Emory Riggins answer filed.

Dec 11 General Replication,

" " Order for Commission to S. W. Jones Esq. Commission issued.

Commission

State of Maryland Somerset County to Wit (Seal) The State of Maryland to Samuel W Jones Esquire of Somerset County Greeting. We Reposing Trust and Confidence in your Integrity Diligence and Ability have appointed and by these presents do appoint you Commissioner to examine Witnesses in a cause depending in Somerset County Court sitting as a Court of Chancery wherein Thomas

Lord Henry Ward Joseph B Pinkney and Joshua R Hall partners trading under the firm of Pinkney and Hall are Complainants and Emory Riggin are Defendants you are hereby required, having first taken the Oath here annexed and having also administered the same oath to the persons whom you shall appoint as Clerk to attend the Execution of this Commission that at such time and place as to you shall seem convenient you cause to come before you all such Witnesses as shall be made known to you by either the Complainants or Respondents and that you Examine them on their respective Oaths to be by you administered in the Holy Evangels of Almighty God touching their Knowledge or remembrance of any thing that may relate to the cause aforesaid and that you cause such to be given to the parties aforesaid, or their Attorneys Ten days before you proceed to execute the same, and having received the depositions of the said Witnesses so taken by you and thereto annexed you send the same with this Commission closed under your hand and seal to the said Court with as convenient speed.

Witness The Honorable Ark Spence Chief Judge of the Fourth Judicial District of Maryland the 25 day of December Anno Domini 1850

W S W for Pff. }
E Long for Defts. }

Per order. W. J. G. Polk Clk

Commissioners Oath.

You shall Samuel W Jones shall according to the best of your Skill and Knowledge duly Faithfully and without partiality to any or either of the parties [illegible] the Examination of any and every Witness or Witnesses produced and Examined by virtue of this Commission here to annexed upon the Interrogatories or cross Interrogatories which may hereafter before the same Commissioner is closed be produced to and left with you by either of the said parties so help you God. Who then Oath was administered by me the within named Commissioner on the 25 day of February 1851

Before Isaac Gibbons.

Clerks Oath

You also Samuel W Jones shall duly Faithfully and without partiality to any or either of the parties in this cause take note down and transcribe the depositions of all and every Witness and Witnesses produced before and examined by the Commissioner named in the Commission here to annexed so far forth as you are directed by said Commission and employed to take note down and transcribe the same and any proof of them, so help you God. Sworn Before me on the 14th day of March 1851.

S W Jones Commissioner

You William T Byrd shall duly Faithfully and without partiality to any or either of the parties in this cause, take note down and transcribe the depositions of all and every Witness & Witnesses produced before and examined by the Commissioner named in the Commission here to annexed so far forth as you are directed by said Commissioner and employed to take note down and transcribe the same & any of them so help you God. Sworn Before me on the 21 day of March 1851

S W Jones Commissioner

To the Sheriff of Somerset County. You are hereby commanded to summon William