gent circumstances and without even any employment or visible means of support for himself and family except what he might derive from the aforesaid agency and the property of the said Elisha which in virtue thereof was in his hands and under his management. And your orators further shew unto your Honor that the said deed so as aforesaid made & executed by the said Elisha to the said William F. being as they are advised and insist for the reasons herein stated fraudulent & utterly void. Your orators have by the said Robert W as their trustee aforesaid applied to the said William F. and requested him to deliver up and convey to the said Robert W, to be held by him for the purposes stated in the deed herein before first mentioned and referred to as exhibit A, the land embraced in the said deed from the said Elisha to the said Elisha to the said William F. And your orators well hoped that the said William F would have complied with such their reasonable requests as in justice and equity he ought to have done. But now so it is may it please your Honor that that the said William F, combining and confederating together and with divers other persons at present unknown to your orators whose names when discovered your orators pray they may be at liberty to insert herein with apt words to charge them as parties defendants hereto and contriving how to wrong and injure your orators in the premises he the said William absolutely refuses to comply with the reasonable requests of your orators pretending and asserting that the said deed executed by the said Elisha to him was for a fair bona fide and full consideration and procured by no undue and fraudulent means on his part whereas your orators charge that the said William F well knows that the same was procured by the misrepresentation & deceit herein before stated in, not in violation of the confidence reposed in him by the said Elisha & without the payment of a single dollar for the land therein embraced, all which actings doings refusals and pretences are contrary to equity and good conscience and tend to the manifest wrong and injury of your orators in the premises. In tender consideration whereof and for as much as your orators can only have adequate relief in the premises in a Court of Equity where matters of this nature are properly cognizable and relievable, To the end therefore that the said William F, and his said confederates when discovered may upon their several and respective corporal oaths full, true direct and perfect answers make to all and singular the matters aforesaid and that as fully and particularly as if the same were here repeated and they and every of them distinctly interrogated thereto and that the said deed bearing date the twenty first day of June in the year eighteen hundred and thirty nine and of which your orators exhibit B, purports to be a copy may be set aside and cancelled by a decree of this Court and that an account may be taken of the rents issues and profits received by the said William F. from the lands embraced in the said deed since the date thereof and that he may be decreed to pay the same to the said Robert W, as trustee aforesaid. And that your orators may have such other and further relief in the premises as the nature and circumstances of this case may require and to your Honor may seem meet. May it please your Honor to grant unto your orators the states

most gracious writ of subpoena to the said William F. to be directed commanding him to be and appear in this Court by a day to be appointed and answer the bill of complaint and to stand to and abide by such decree as your Honor may pass in the premises & your orators as in duty bound.

John Johnson Jr.
John B Brooke Solr. for the Compts.

Complainants Exhibit A.

This Indenture made this twenty fourth day of February in the year of our Lord one thousand eight hundred and forty between Elisha Berry of Prince Georges County and State of Maryland of the one part and Robert W Brooke of the same County and State of the other part, Witnesseth that for and in consideration of the sum of five dollars current money of the State of Maryland to him in hand paid by the said Robert W Brooke the receipt whereof is hereby acknowledged he the aforesaid Elisha Berry hath given granted bargained sold aliened enfeoffed and confirmed and by these presents doth give grant bargain alien enfeoff and confirm unto the said Robert W Brooke his heirs and assigns all that tract or parcel of land called and known by the name of Good Luck or Springfield upon which the said Elisha Berry now resides lying and being in the County and State aforesaid together with all and singular the buildings improvements woods ways water courses rights liberties privileges hereditaments and appurtenances whatsoever thereunto belonging or in any ways appertaining and the reversions remainders rents issues and profits thereof and all the estate right title and interest whatsoever of him the said Elisha Berry which he hath either in law or equity of in and to the said tract part or parcel of land hereby bargained and sold as also one other tract part or parcel of land lying and being in the County and State aforesaid called and known by the name of "Provincial" which was purchased of a certain Anthony Lenkson by a certain Elisha Berry Senr. also all that tract part or parcel of land lying and being in the County and State aforesaid called and known by the name of "Enclosure," or Enclosures as also one other tract part or parcel of land lying and being in the County and State aforesaid called and known by the name of "Fife Enlarge"; as also one other tract part or parcel of land lying and being in the County and State aforesaid called and known by the name Chillum Castle and Belfast or addition to Charles Gift it being the land Richard H Marshall my former Trustee purchased of one from Benjamin Duvall as also one other tract part or parcel of land lying and being in the County and State aforesaid at a place called Bentiville a house and lot which fell to me by Ann Berry together with all and singular the improvements woods ways rights liberties privileges hereditaments appurtenances of each and every of the aforesaid tracts parts or parcels of land whatsoever thereunto belonging or in any manner appertaining and also the rents issues reversions and remainders and profits thereof and all the estate right title and interest thereof him the said Elisha Berry which he hath in law or equity of in and to the aforesaid tracts and parcels of land hereby bargained and sold together with all my slaves that I have now in my possession to wit, Michael Andrew, John Little Steven Sophy and her children to wit, Nancy, Milly, Hanson, John and