Dent, George T Richards and Priscilla M Richards to be and appear in your Honorable Court on a certain day to be therein insert and under a certain pain, to answer the premises and abide by the decree of your Honorable Court and that the deed of conveyance and bill of sale may be declared fraudulent and the same vacated by a decree of your Honorable Court and that your orator may be paid their money and that your Honors may grant such other and further relief in the premises as may be consistent with equity and good conscience and as in duty bound they will ever pray &c.

P W Crain &
John M T Cousin, for Complt.

Exhibit A

At the request of Priscilla M Richards the following bill of sale was recorded this 2d day of August, Anno Domini 1844 — Know all men by these presents that I Zachariah Dent of Chas County, for and in consideration of the sum of seven thousand dollars current money, to me in hand paid by Priscilla M Richards I have granted bargained sold and delivered and by these presents do give grant bargain and sell and deliver unto the said Priscilla M Richards the following property to wit, one negro man Jim aged 47 years negro Tom aged 24 years, boy Dick twelve years old Henry eight years old Alexander five years old Peggy thirty one years old Eleanor thirteen years old Lydia sixty years old eight head of Horses thirty one head of cattle including oxen broke and unbroke, oxen, twenty four head of hogs all my house hold and kitchen furniture my crop Tobacco, in the House and growing, my crop wheat and oats and corn growing all of which property I warrant and defend to the said Priscilla M Richards her heirs and assigns forever against myself or any person or persons to claiming the same or any part thereof. Witness my hand and seal this 15th July 1844.

Zachariah Dent, (Seal)

Signed Sealed and delivered in the presence of, John W M Pherson J. P.

On the back of the aforegoing bill of sale is thus written to wit,

Maryland Charles County to wit — On this 15th July 1844 personally appears Zachariah Dent before the subscriber a Justice of the peace for said county and acknowledges the within bill of sale to be his act and deed according to the purport true intent and meaning thereof and the act of assembly in such case made and provided.

Witness my hand and seal. — John W M Pherson, J. P.

I hereby certify that the aforegoing Bill of sale is truly copied from Liber W. M. 4 folio 174 & 178 one of the land records of Charles County.

In Testimony whereof I have hereunto subscribed my name and affixed the seal of Charles County Court this 25 day of October 1844. (Seal)

W Mitchell Clk

Memd A copy of the deed referred to in the aforegoing Bill will be found returned with the commission.

Charles County Court, The State of Maryland to Zachariah Dent George T Richards and Priscilla M Richards his wife of Charles County Greeting you are hereby commanded that all excuses set apart you be and appear before Charles County Court as a Court of Equity to be held at Port Tobacco in and for Charles County aforesaid, on

the third monday of November next to answer the Bill of Complaint of Benjamin Swann and others against you in said Court Exhibited — Hereof fail not as you will answer the contrary at your peril — Witness the Hon W B Stone Chief Judge of our said Court this 25th day of October 1844 — Issued the 25th Oct. 1844.

W Mitchell, Clk

Sum. Jno B Lawson, Shff.

Charles County to wit, — The State of Maryland to Zachariah Dent, Priscilla M Richards and George T Richards her husband of Charles County their agents and attorneys Greeting, Whereas Benjn Swann, Tamence Swann and Theophilus Swann, minors by Allison Roberts their Guardian have exhibited to Charles County Court as a Court of Equity their bill of complaint against you the said Zachariah Dent, Priscilla M Richards and George T Richards her husband for relief in Equity and to prohibit and enjoin you the said Zachariah Dent, Priscilla M Richards and George T Richards her husband your agents and attorneys from removing certain negroes from the State of Maryland until the final adjudication of said Court — The names of the negroes are first negro man Jim aged forty seven, negro Tom aged four years boy Dick aged twelve years, Henry aged eight years Alexander five years, Peggy thirty one years Eleanor thirteen years, Lydia seventy years, You the said Zachariah Dent Priscilla M Richards and George T Richards her husband your agents and attorneys are therefore hereby commanded and strictly enjoined from selling or in any manner disposing of the said negroes, to wit Jim Tom Boy Dick Henry Alexander, Peggy, Eleanor and Lydia until the further order of the said Court as a Court of Equity — Witness The Hon'ble William B Stone Esq chief Judge of the first Judicial District of Maryland the 25th day of Oct. 1844 — Issued the 25th day of October 1844.

Walter Mitchell Clk of Charles County Court

Injoined — Jno B Lawson Shff

To the Honorable the Judges of Charles County Court sitting as a Court of Equity — The Petition of Benjamin Swann Tamence Swann and Theophilus Swann minors by Allison Roberts their guardian respectfully shew unto your Honors that a certain Zachariah Dent is indebted to them the said minors in a large sum of money amounting to three thousand eight hundred and fifty dollars and unto other persons in a sum of six hundred dollars, that for the purpose of defrauding your Petitioners and his other creditors he executed on the fifteenth of July Anno Domini eighteen hundred and forty four a deed and bill of sale of all of his real and personal property to his married daughter Priscilla M Richards the wife of George T Richards, that the debt of your Petitioners remain unpaid and your Petitioners for themselves and on behalf of the other creditors of said Zachariah Dent have filed a bill in your Honorable Court against the said Zachariah Dent, Priscilla M Richards the fraudulent grantee and George T Richards her husband that said bill is now depending in your Honorable Court & that the most valuable property conveyed by said instruments of writing consists of negroes and your petitioners believe that before their Chancery case can be decided, the said George T Richards the husband of Priscilla M Richards Priscilla M Richards and Zachariah Dent will remove said negroes from