begun and held at the City of Annapolis on the second Tuesday of March in the year of our Lord one thousand Eight hundred and fifty one.

Present

The Honorable John Johnson Chancellor

Louis Gassaway Register.

We had (among other) the following proceedings.

Septimus D. Sewell vs. James Baxter and Emily his wife James Partlett and Hannah Partlett. John Moore and William Buckingham

"Be it remembered that heretofore to wit, on the twenty sixth day of August in the year of our Lord one thousand Eight hundred and forty nine came Septimus D. Sewell by George H. Brice and Thomas S. Alexander Esquires his Solicitors into the Court of Chancery of the State of Maryland and exhibited in said Court his Bill of complaint against James Baxter and Emily A. his wife James Partlett and Hannah Partlett John Moore and William Buckingham in the words following to wit:

To the Honorable John Johnson Chancellor of Maryland.

The Bill of Complaint of Septimus D. Sewell of Harford County humbly shows that a certain Joshua Swann late of Baltimore County deceased was in his lifetime seized and possessed of certain tracts or parcels of land lying and being in the County last aforesaid and being so seized and possessed on the twenty second day of October in the year Eighteen hundred and nineteen convey said lands unto his daughter Emily Augusta Swann now the wife of James Baxter of the County last aforesaid as by a copy of said deed of conveyance marked Exhibit A and filed herewith a part of this bill more certainly appears. That said Joshua Swann was before and at the time of making the deed of conveyance largely indebted unto divers persons and amongst the rest unto certain Charles S. Sewell and Matthew Murray and that said conveyance was made and executed by the said Joshua Swann without any good or valuable consideration for the same that said deed purports on its face to be made for and in consideration of the natural love and affection which the said grantor bore to his said daughter and in fact the same was made fraudulently and with intent and in furtherance of a conspiracy between the parties thereto to delay hinder and defraud the said Charles S. Sewell and Matthew Murray and others creditors of the said Joshua Swann as aforesaid. That the said Joshua Swann after execution of said deed retained possession of the premises mentioned therein continually cultivating and taking to his own use the rents issues and profits thereof. And your Orator further charge that at September Term in the year Eighteen hundred and twenty one of Baltimore County Court the said Charles S. Sewell recovered judgment against the said Joshua Swann for the sum of Two Thousand Dollars and cost as by a short copy of said judgment marked Exhibit B and filed herewith a part of this bill appears, and the said Matthew Murray recovered judgment against the said Joshua Swann for the sum of Eight thousand Dollars and cost as by a short copy of this said judgment marked Exhibit C, and filed herewith as part of this bill appears which said judgments were recovered as aforesaid for the very debts so as aforesaid due and owing by the said Joshua Swann to the said Swann Sewell and Murray respectively and before the date of the said conveyance and payment whereof

was intended to be delayed hindered and prevented as aforesaid. That writs of fieri facias were duly issued out of Baltimore County Court on said judgments in virtue whereof the lands aforesaid were taken in execution by the Sheriff of said County and in due form of law sold to the said Charles S. Sewell who paid and satisfied the purchase money therefor to the said Sheriff as by a copy of the deed made by the said Sheriff to the said Charles S. Sewell marked Exhibit D and filed herewith as part of this Bill appears. And your Orator further charges that at the time of said sale the said Joshua Swann was possessed of the said premises to his own use and emolument the rents issues and profits thereof and that immediately after said sale he acknowledged the title of the said Charles S. Sewell as purchaser thereof and agreed to become his tenant and to pay him a yearly rent for the use and occupation thereof and so being tenant as aforesaid the said Charles S. Sewell on the fifteenth day of April in the year Eighteen hundred and thirty nine demised said premises to the said Joshua Swann for the term of ninety nine years at a yearly rent of fifty three dollars, as by a copy of the indenture of lease executed by the said Sewell and Swann which is marked Exhibit E. and filed herewith as part of this bill appears. In virtue of which said demise the said Swann remained in possession of said premises thenceforth continually taking the rents and profits thereof and occasionally paying monies on account of rent reserved as aforesaid until his death which happened in the year Eighteen hundred and forty. And your Orator further charges that after the death of the said Swann the said James Baxter and Emily his wife entered upon the premises aforesaid claiming and pretending title thereto under color of the aforesaid deed from the said Joshua Swann & the said Emily well knowing however the fraudulent character of said deed & the title of the said Charles S. Sewell as purchaser as aforesaid and the lease aforesaid from the said Sewell to the said Swann. And the said Baxter and wife further to carry into effect the fraudulent objects of said deed and to delay hinder and defraud the said Sewell in collusion and conspiracy with the persons hereinafter named as their grantees on the twenty seventh day of March in the year Eighteen hundred and forty five conveyed part of said premises unto James Partlett of Baltimore County in trust for his daughter Hannah Partlett as by a copy of said deed marked Exhibit F. and filed herewith as part of this bill appears and another part of said premises unto John Moore of said County as by a copy of said deed marked Exhibit G. and filed herewith as part of this Bill appears, and on the first day of November in the year Eighteen hundred and forty seven the said Baxter and wife conveyed other part and parcel of said premises unto William Buckingham of said County as by a copy of said deed marked Exhibit H, and filed as part of this bill appears. And your Orator further charges that at the dates of the conveyances respectively made to them as aforesaid the said grantees and every of them had notice of the title of the said Sewell to the premises aforesaid and of the fraudulent origin of the claim or pretended title of the said Baxter and wife to the same that the said conveyances were fraudulently made and without any good or valuable consideration