to the City aforesaid, it is deprived of this advantage by the deviation of which your Orators have above complained; and your Orators well knowing the importance of a straight highway to connect their said real estate with the City aforesaid would never have consented and do not consent to any plan or scheme by which a road should be made extending from Charles Street to and through their said land in any other than a direct course in a straight line with said Street; and so far from agreeing to the road line above complained of your Orators would greatly have preferred that the project for the turnpike road should have fallen through and to have awaited the natural course of events which in the progress and growth of said City would have extended the said Charles Street in a straight line through Orators said land, and it was because your Orators saw that the General Assembly in its wisdom had prescribed a direct North course for the said road and because they relied upon the faithful adherence of the said Charles Street Avenue Company to the provisions and requirements of its Charter aforesaid that they came to the support the said Company and the turnpike road it was in contemplated to construct. And in divers particulars which your Orators to avoid tedious repetition refrain from stating fully they are adversely and injuriously affected in their interest and rightful enjoyment as aforesaid in and of the said tract of land or farm by the deviation above mentioned.

But now so it is that the said Charles Street Avenue Company notwithstanding the premises and the injury or suspension in its powers caused by its said deviation from the proper route of the said turnpike road combining and confederating with one William S. Crawley contractor is proceeding to make and extend the said road over and upon the Clover Hill Farm aforesaid (whereof your Orators are seized as aforesaid) and hath notified your Orators of their purpose and intention so to do; And the said William S. Crawley who is contractor for the making of the said road or part of the work of the construction thereof, hath by the direction of the said Company wrongfully entered upon your Orators said land the Clover Hill Farm aforesaid and hath commenced to pull down the fences thereof, and to make excavations of the soil thereof for the purpose as he and the said Company alleged of constructing a road over and across the said Clover Hill Farm; and that although the said Charles Street Avenue Company and the said William S. Crawley from entering or trespassing upon the said farm or any part thereof have been distinctly prohibited and forbidden by your Orators; all of which acts doings and proceedings are contrary to Equity and tend to the irreparable injury of the said farm and your Orators

In 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 Charles Street Avenue Company and William S. Crawley may true and perfect answer make to all and singular the matters aforesaid and that as fully and particularly as if the same were here repeated and they and each of them distinctly

interrogated thereto; And that the said Company and the said William S. Crawley may be restrained by the order and injunction of this Honorable Court from entering or remaining upon using or disturbing the said Clover Hill Farm or any part thereof; and from proceeding to make excavate or construct any road over or upon the said farm; and from doing any act or work upon the said farm in or towards or having reference to the making of a road thereupon and that your Orators may have such further and other relief as the nature of this case may require and to your Honor may seem meet.

May it please your Honor to grant unto your Orators a Writ of Injunction against the said Charles Street Avenue Company and the said William S. Crawley enjoining and strictly prohibiting them and each of them from entering or remaining upon using or disturbing the said farm or tract of land commonly known as Clover Hill or any part of the said farm; and from proceeding to make excavate or construct any road over or upon the said farm; and from doing any act or work upon the said farm in or towards or having reference to the making of a road thereupon; and also the Writ of Subpoena against the said Charles Street Avenue Company and the said William S. Crawley commanding them and each of them to appear in this Court at some certain day to be therein named to answer the premises and abide by and perform such decree as may be passed therein; And as &c

R. J. Gittings } Solicitors
A. W. Machen } for Complainants

State of Maryland, Baltimore County. Sct On this Twenty Seventh day of November in the year 1856, before me a Justice of the Peace of the said State in and for the County aforesaid personally appeared Joseph Merryman one of the above named Complainants and made oath that the matters stated in the foregoing Bill are true.

Geo W. Ritter

On which said Bill are the following Endorsements, to wit;

Ordered this twenty Seventh day of November 1856 that the prayer for and Injunction in the foregoing Bill contained be set down to be heard at 7 O'Clock P.M. of this 27th November 1856.

W. K. Price

Let Injunction issue as prayed on giving Bond in the penalty of $8000. with the usual condition and with Security to be approved by the Clerk.

Nov 28th 1856 W. K. Price

Whereupon in compliance with the foregoing order the following Bond was filed, to wit;

Know all men by these presents that Joseph Merryman Oliver T. Merryman, Eleanor Merryman, Lewis Merryman, Charles Merryman, George Merryman, William Gray and Samuel Maccubbin are held and firmly bound unto the Charles Street Avenue Company and William S. Crawley in the full and just sum of Eight thousand dollars to be paid to the said Charles Street Avenue Company and William S. Crawley their certain attorney Ley at representatives or successors or assigns; to which payment well

and)