and truly to be made and done we bind ourselves our respective heirs & executors and administrators jointly and severally firmly by these presents sealed with our seals and delivered this twenty ninth day of November in the year 1856.

Whereas the said Joseph Merryman, Oliver P. Eleanor, Lewis, Charles, and George together with Nelson Merryman are about to obtain from the Honorable the Judge of the Circuit Court for Baltimore County sitting in Equity a Writ of Injunction to restrain and enjoin the said Charles Street Avenue Company and William S. Crawley from entering or remaining upon taking or disturbing the farm and tract of land of the said Joseph, Oliver P. Eleanor, Lewis Charles, George and Nelson in Baltimore County aforesaid commonly known as Clover Hill or any part of said farm; and from proceeding to make to 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. Now the condition of this obligation is such that if the said Joseph, Oliver P. Eleanor Lewis, Charles, George and Nelson shall prosecute the said Writ of Injunction with effect or shall satisfy and pay all costs and damages that shall be occasioned by the issuing of the same and in all things abide such order or decree as the said Circuit Court for Baltimore County shall pass in the premises then and in that case the above obligation to be void and of none effect else to be and remain in full force and virtue.

Signed Sealed & delivered
by the said Jos Merryman — Jos Merryman (Seal)
O. P. Merryman — Oliver P. Merryman (Seal)
and Lewis Merryman — Lewis Merryman (Seal)
in the presence of John J. Anderson

Signed Sealed & delivered by the
Said Eleanor Merryman — Eleanor Merryman (Seal)
Solomon A. Rollins

Witness whereof J. Joseph Gray — William Gray (Seal)

Witness the signatures of
Charles Merryman — Charles Merryman (Seal)
George Merryman — George Merryman (Seal)
and Sam Macubbin — Sam Macubbin (Seal)
Robert C. Barnes

Which Bond is thus endorsed, to wit, I Believe the securities in the within Bond sufficient — H. M. Fitzhugh Clerk

Bond approved
Decr 1st 1854. — Jno H. Price

Whereupon the said Charles Street Avenue Company and William S. Crawley voluntarily appear in Court here by James Malcolm and Charles H. Pitts Esqrs their attorneys and filed in Court here the following answers to wit. The answer of William S. Crawley to the Bill of Complaint of Joseph Merryman and others in this Honorable Court exhibited reserving all objections to said Bill for answer thereunto and nevertheless says that he admits that he is at work as the contractor of said Charles Street Avenue Company upon the lands of said Merry-

man and others but that he is not a trespasser as is alleged. The other matters and things charged he neither admits nor denies and insists upon proof thereof and prays hence to be dismissed and he will ever &c.

C. H. Pitts
J. Malcolm } Attys Deft

To the Honorable John H. Price Judge of the Circuit Court for Baltimore County.

The answer of the Charles Street Avenue Company to the Bill of Complainant of Joseph, George, Eleanor, Oliver P. Charles Lewis and Nelson Merryman against the said Company and William S. Crawley in said Court exhibited.

This defendent reserving to itself all and all manner of exception to the said Bill for answering unto so much thereof as it is advised that it is necessary for it to make answer unto says that it admits that the said Complainants are seized of the said property called Clover Hill as is alleged in their said bill. This respondent admits that it was chartered and made a body corporate by the Legislature of Maryland as averred in said bill. That its stock was subscribed for and that it was duly organized as charged in said Bill. It admits that the said Complainants Joseph, George, Charles and Oliver subscribed to the Stock of said Company as charged in said Bill and that they paid for the said Stock as they have averred in said Bill. This Respondent admits that it has made a deviation from a straight line or due North course upon the lands of Mr Wyman to the extent charged in said Bill but it expressly denies that said deviation is in any way or to any extent a violation of its charter or of the rights of the said Complainant. And this respondent avers and charges that said deviation was absolutely necessary and unavoidable under the provisions of the 12th Section of its said act of Incorporation which is as follows, to wit; Section 12, And be it enacted that nothing in this act shall be construed to authorize or empower the location of said Turnpike through or over the grounds occupied by the Maryland State Agricultural Society without their consent or until they shall have abandoned the use of said grounds as a place for the holding of their Annual Show or fair nor shall it be lawful to lay out or extend the said Road through the Buildings, yards or Orchards of any person or persons without the consent of the owner or owners thereof. This Respondent as ascertained by actual survey that if its said road had been located by a straight line or due North course it would have passed through the orchard of said Wyman. This Respondent made every possible effort by its agents to obtain the consent of said Wyman that said road should pass by a straight line or due North course through his said land, but this respondent was therefore compelled to make the deviation and adopt the location of the road that is complained of in said Bill, And this Respondent avers and insists that in making said deviation and adopting said location it has done the best for the interests of all persons, stockholders and others concerned in said road that it was possible to do and with no