Amelia Reed formerly Amelia Wright daughter of Isaac Wright
vs
Curtis Davis Sylvester H. Smith William Henry Watkins and William Stack

Caroline County Court: Be it remembered that heretofore to wit: On the Nineteenth day of April in the year of our Lord One thousand Eight Hundred and fifty six came the said Amelia Reed formerly Amelia Wright and Daughter of Isaac Wright by Samuel Hambleton Esquire her Solicitor and Exhibited her Bill of Complainant against the said Curtis Davis, Sylvester H. Smith, William Henry Watkins and William Stack in the words and of the tenor following, to wit;

To the Honorable P. B. Hopper Judge of the Circuit Court for Caroline County as the Equity side thereof.

The Bill of Complaint of Amelia Reed formerly Amelia Wright and daughter of Isaac Wright late of Worchester County respectfully makes known unto your Honor that the said Isaac Wright departed this life on or about the twenty third day of January Eighteen Hundred and fifty having first made and executed in due form of law his last Will and Testament bearing date the day of Eighteen Hundred and forty Eight as by a Copy thereof herewith filed marked Exhibit A and prayed to be taken as a part of this Bill will more fully appear.

Your Oratrix further makes known unto your Honor. That under and by virtue of the provisions of the last will and testament of the said deceased father Isaac Wright among other lands & premises allotted by the Commissioners therein named to your Oratrix, the lands and Real Estate belonging to the said deceased situate in Caroline County known as the "Old Nichols Farm" wherein she now resides, being part of the lands originally owned by one Isaac Nicols and the farm which were bought and sold by one James Brown trustee of Daniel Caulk an Insolvent Debtor and Conveyed to said Isaac Wright by said James Brown by Indenture bearing date the fifth day of May in the year Eighteen Hundred and twenty seven duly recorded among the Land Records of Caroline County as by reference to a Copy of said Indenture hereunto filed Exhibit B and prayed to be taken as part of this Bill will more fully appear.

Your Oratrix further makes known unto your Honor that she has been in the quiet and peaceable possession of the arable land in cluded in said Farm ever since the decease of her said Father & also of the Woodland attached thereto and that her father Isaac Wright was in the peaceable possession of the same from the time of his purchase thereof to the day of his death. That among the land always included and held and used occupied and cut upon as part thereof by the said deceased father Isaac Wright and all tenants and occupants under him, is an adjoining piece of timber land containing about thirty five acres of land more or less. Your Oratrix further makes known unto your Honor that on or about the month of January 1855 a certain Curtis Davis,

Sylvester H. Smith, William Henry Watkins and William Stack have commenced cutting and destroying the timber upon the same & are now Engaged with a large force from ten to fifteen in number cutting and destroying the said timber and have announced their determination to cut and carry off all the timber thereon despite the Entreaties and remonstrances of your Oratrix. Your Oratrix further makes known unto your Honor that her said tract of land wherein she resides as before stated known as the Old Nichols farm has no more timber thereon than is absolutely necessary for said farm including the part now nearly cut down and destroyed by the aforesaid Davis Smith, Watkins and Stack. That the destruction of said timber land will be of great and almost irreparable injury to her said farm. That no Compensation in the shape of Damages for the actual value of said timber will Compensate your Oratrix for such destruction of said timber. Your Oratrix further makes known to your Honor that she intends on entering in Caroline Court the Writ of Ejectment and Trespass against the said parties but before the same can be brought to trial all the wood and timber on said land will be destroyed and carried off as one half thereof is now cut down and the said parties have announced their intention not to desist until the whole is cut down.

In as much therefore as your Oratrix is remediless in the premises save by the aid of this Honorable Court may it please your Honor to grant to your Oratrix the Writ of Injunction against the said Curtis Davis Sylvester H. Smith, William Henry Watkins and William Stack Commanding them and each of them their agents servants and hirelings to stay and surcease all and all manner of cutting and waste upon the said tract of timber land and also enjoining them from hauling off or removing from said premises the timber and wood of all sorts already cut and now on said premises until the further order of this Court. And also to grant to your Oratrix the Writ of Subpoena to the said Curtis Davis Sylvester H. Smith, Henry Watkins and William Stack Commanding them to be and appear in this Court at some day to be therein named to answer the premises and abide the future order of this Court and to grant to your Oratrix all such further and other relief as her case may require and as in duty bound &c.

Saml Hambleton
Sol'r for Compl't.

State of Maryland, Caroline County, to wit

Be it remembered, that on this twenty seventh day of March 1855 before the subscriber a Justice of the Peace of the State of Maryland in and for said County personally appeared Amelia Reed of said County and made oath on the Holy Evangely of Almighty God that the matters and things in the within bill stated are true to the best of her knowledge recollection and belief.

Sworn before. Daniel Sparklin J.P.