mill existed, and a mill has ever since existed, and still exists on the Patuxent River between the lands of the late Rezin Snowden, and the late D. Theo. Jenkins, to which the said road led, and still leads almost in a direct line, and over which grain was conveyed to the mill, and iron ore to the furnace.

And your orator further shows that about eight years ago one John D. Latchford who your orator prays may be made defendant hereto purchased a tract of land through which the said road runs, and some time thereafter claimed a right to close said road, and prevented some persons who yielded to his pretensions and were unwilling to contend with him from passing over the same; and when your orator commenced working the Muirkirk furnace being a stranger in the County he so far yielded to the pretensions of the said Latchford, as to pay him toll for all the iron ore hauled over the said road which said payments were made in ignorance of the facts, and in consequence of the allegations by the said Latchford that the said road was a private road and not a public road. And your orator further shows that the said Latchford threatens to obstruct and close the said road and exclude your orator therefrom: which obstruction would if carried into effect produce great injury to your orator and special damage beyond what would be suffered by the public generally on account of the peculiar necessity hereinbefore explained of maintaining constant and unremitting supplies of ore for his furnace aforesaid, and the fact that if the said road be closed, the ore from said banks would have to be transported to the said furnace over other roads making a greatly increased distance and requiring more teams and vehicles than your Orator possesses or can provide within any reasonable time.

To the end therefore that the said Defendant may answer the premises and may be enjoined from closing or obstructing the said road, and that your Orator may have such further and other relief as to your Honor may seem just.

May it please your Honor to grant unto your orator a writ of injunction perpetually enjoining and strictly prohibiting the said Defendant from closing or obstructing the said road now, and at all times hereafter, and also the writ of Subpoena against the said Defendant commanding him 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 in duty &c &c

C. C. Magruder Jr
Solicitor for Petitioner

State of Maryland, Prince Georges County. Sc.
Before the undersigned, a Justice of the peace in and for the County aforesaid personally appeared Charles E. Coffin and made oath according to law that the matters and things stated in the foregoing bill as of his own knowledge are true, and those stated and those stated upon the information of others he believes to be true

Chas E. Coffin.

Sworn to before Lester D. Moore J.P. Rev Stamp 6c

The Clerk of the Circuit Court for Prince Georges County as a Court of Equity will issue an injunction as prayed in the foregoing bill, upon the Complainants filing a bond to the State of Maryland in the usual form with securities to be approved by this Court or the Clerk thereof in the penalty of one thousand dollars

April 8. 1867 Saml H. Berry

The Exhibits referred to in the foregoing bill being in the following words, to wit:

State of Maryland Prince Georges County, to wit:
Be it remembered that on this Seventh day of March the year of our Lord Eighteen hundred & sixty seven before me the subscriber a Justice of the Peace of the State of Maryland in and for Prince Geo. Co aforesaid personally appeared.

Mark Duvall who says he was born in this neighborhood and has lived here ever since and has a distinct recollection of the neighborhood for the last forty years is well acquainted with the old mill Road which crosses the Turnpike near the twenty first mile stone, and running between the Lands of Wm H. Minnix & Dl. W. Reese and through the lands of John D. Latchford, Jas. H. Comsey, Ben A Alsop and late Dr. Thos. Jenkins to intersect the old stage Road as laid down upon the accompanying plat. this Road to his knowledge has been open to the use of the Public and has been publicly used for forty years at least and from his earliest recollection there has been no change made in the course of the Road within that time except the slight change made by Mr Latchford where he has been digging Ore. There was never any attempt by any one to close the road until six or seven years ago after Mr J. D. Latchford had purchased part of the Land through which it passes when he claimed the right to close the road and excluded some persons from using it.

Mark Duvall