year of our Lord one thousand seven hundred and eighty five at Prince Georges County aforesaid were indebted to them the said John and Joseph in the sum of one thousand three hundred and seven pounds fourteen shillings and seven pence sterling money for sundry matters properly chargeable in Accounts as by a particular Account thereof herewith into Court brought may appear and being so thereof indebted the aforesaid Patrick, Walter Brooke, and Lilbourn afterwards to wit on the day and year aforesaid at the County aforesaid in consideration thereof upon themselves assumed and to the said John and Joseph then and there faithfully promised that they the said Patrick Walter Brooke, and Lilbourn the aforesaid sum of sterling money to them the said John and Joseph when afterwards they the said Patrick, Walter Brooke and Lilbourn should be thereunto required would well and truly content and pay. And whereas the aforesaid Patrick, Walter Brooke and Lilbourn afterwards to wit on the day and year aforesaid at Prince Georges County aforesaid were indebted to them the said John and Joseph in one other sum of one thousand three hundred and seven pounds fourteen shillings and seven pence sterling money for divers Goods and Merchandizes by them the said John and Joseph to the said Patrick, Walter Brooke, and Lilbourn and at the special instance and request of them the said Patrick, Walter Brooke and Lilbourn before that time there sold and delivered, and the said Patrick, Walter Brooke and Lilbourn so therein being indebted the same Patrick, Walter Brooke and Lilbourn then and there in consideration thereof upon themselves assumed and to the said John and Joseph then and there faithfully promised that they the said Patrick, Walter Brooke and Lilbourn the said sum of one thousand three hundred and seven pounds fourteen shillings and seven pence sterling money last mentioned to the said John and Joseph when thereunto afterwards they the said Patrick, Walter Brooke, and Lilbourn, should be requested would well and faithfully content and pay. And whereas also the said John and Joseph afterwards to wit on the same day and year above said at Prince Georges County aforesaid in consideration that the said John and Joseph had at the special instance and request of them the said Patrick, Walter Brooke and Lilbourn before that time then sold and delivered to the said Patrick, Walter Brooke and Lilbourn divers other Goods and Merchandizes the said Patrick Walter Brooke and Lilbourn in consideration thereof afterwards to wit on the same day year and place last mentioned upon themselves assumed and to the said John and Joseph then and there faithfully promised that they the said Patrick, Walter Brooke, and Lilbourn so much sterling money as they the said John and Joseph for the Goods and Merchandizes last mentioned should reasonably deserve to have to them the said John and Joseph when afterwards they the said Patrick, Walter Brooke and Lilbourn should be thereunto requested would well and truly content and pay and the said John and Joseph in fact say that they for the Goods and merchandizes aforesaid last mentioned reasonably deserved to have of the said Patrick, Walter Brooke, and Lilbourn one other sum of one thousand three hundred and seven pounds fourteen shillings and seven pence of like sterling money and thereof the said John and Joseph afterwards to wit the same day year and place above said to the said Patrick, Walter Brooke, and Lilbourn gave notice, And whereas also the aforesaid

Patrick

Patrick, Walter Brooke and Lilbourn afterwards to wit on the day and year aforesaid at Prince Georges County aforesaid were indebted unto them the said John and Joseph in another sum of one thousand three hundred and seven pounds fourteen shillings and seven pence sterling money for the like sum of one thousand three hundred and seven pounds fourteen shillings and seven pence sterling money by them the said John and Joseph at the special instance and request and to and for the use and behoof of them the aforesaid Patrick, Walter Brooke, and Lilbourn before that time there laid out expended and paid and so being thereof indebted the aforesaid Patrick, Walter Brooke, and Lilbourn afterwards to wit on the day and year aforesaid at Prince Georges County aforesaid in consideration thereof upon themselves assumed and to the said John and Joseph then and there faithfully promised that they the said Patrick, Walter Brooke and Lilbourn the last aforesaid sum of money to them the said John and Joseph when afterwards they the said Patrick, Walter Brooke and Lilbourn should be thereunto required, would well and truly content and pay. And the said John and Joseph in fact say that the said several sums of sterling money aforesaid at the time of making the said several and respective promises and Assumptions aforesaid were and always since have been and still are respectively of the Value of two thousand one hundred and seventy nine pounds ten shillings and eleven pence current money to wit at the County aforesaid. Nevertheless the said Patrick, Walter Brooke and Lilbourn their several promises and assumptions aforesaid not regarding but contriving and fraudulently intending them the said John and Joseph of the said several sums of sterling money in this behalf craftily and subtilly to deceive and defraud the said several sums of money or any part thereof or the Value thereof respectively as aforesaid or any part of such Value to them the said John and Joseph or to either of them altho' often thereunto required they the said Patrick, Walter Brooke and Lilbourn have not paid nor has either of them paid but the same sums of sterling money or either of them or the Value of either of them as aforesaid or any part thereof to them the said John and Joseph or to either of them hitherto to pay have altogether refused and still do refuse to the damages of them the said John and Joseph to the Value of three thousand pounds current money and therefore they bring suit and so forth.

W. Cooke Jr. plaintiff's Pledges &c John Doe and Richard Roe.

And the said Patrick Sim and Lilburne Williams by their Attorney aforesaid as before defend the wrong and injury when and so forth, and say that they did not assume upon themselves in manner and form aforesaid as the said John Oxley and Joseph Hancock above against them have complained, And of this they put themselves upon the Country and the said John Oxley and Joseph Hancock doth so likewise &c.

Whereupon this cause standing ready for trial Command is given to the Sheriff of Ann Arundel County that he cause to come before the Judges of our General Court here on the second tuesday of May next twelve &c by whom &c and who neither &c to recognize &c because as well &c the same day is given to the said parties then and there &c.

At which said second tuesday of May being the twelfth day of the same month Anno Domini seventeen hundred and eighty nine come again as well the aforesaid John Oxley and Joseph Hancock by their Attornies aforesaid as the aforesaid Patrick Sim and Lilburne Williams by their Attorney aforesaid, and the said John Oxley and Joseph Hancock by their said Attornies file in Court here the following Account affirmation and deposition to wit

Dr