Ill. Allen Quynn assee. of Samuel Chase against Ags. William Whetcroft.

Be it remembered that heretofore to wit, on the twenty fifth day of March anno domini seventeen hundred and eighty nine the plaintiff by Jeremiah Townley Chase his attorney sued out of our General Court the State of Maryland's writ of Capias ad respondendum directed to the sheriff of Ann Arundel County in the words and figures following to wit.

The state of Maryland ss. To the sheriff of Ann Arundel County greeting. We command you that you take William Whetcroft late of Ann Arundel County otherwise called William Whetcroft if he shall be found in your bailiwick and him safe keep, so that you have his body before the Judges of our general Court to be held at the City of Annapolis on the second tuesday of May next to answer unto Allen Quynn assignee (according to the form of the act of Assembly in such cases lately made and provided) of Samuel Chase of a plea that he ~~the~~ the said William do render unto him the said Allen Quynn the just sum of Eight hundred and eighty five pounds current money of Maryland which to him he owes and unjustly detains andsoforth. hereof fail not at your peril and have you then and there this writ. Witness Robert Hanson Harrison Esquire Chief Judge of our said Court the eighteenth day of November Anno Domini 1788.

Issued the 25th day of March 1789. John Quinn Clk.

J. T. Chase,

And the aforesaid Allen Quynn assignee as aforesaid by his attorney aforesaid declared against the aforesaid William Whetcroft in the plea aforesaid as follows to wit

Maryland, Ann Arundel County, sct. William Whetcroft late of Ann Arundel County otherwise called William Whetcroft was summoned to answer unto Allen Quynn assignee (according to the form of the act of Assembly in such cases lately made and provided) of Samuel Chase of a plea that he ~~the said~~ William do render unto him the said Allen Quynn the just sum of eight hundred and eighty five pounds current money of Maryland which to him he owes and unjustly detains andsoforth.

And

And whereupon the said Allen by Jeremiah Townley Chase his attorney saith that whereas the aforesaid William on the twenty fourth day of September in the year seventeen hundred and seventy eight at Ann Arundel County by his certain writing obligatory acknowledged himself to be held and firmly bound unto him the aforesaid Samuel in the aforesaid sum of eight hundred and eighty five pounds current money of Maryland to be paid unto him the said Samuel when afterwards he the said William should be thereunto required and the aforesaid Samuel afterwards to wit on the first day of August in the year seventeen hundred and eighty three at the County aforesaid (having first made oath in the City of Annapolis before James Brice Esquire then Mayor of the said City that no part of the money mentioned in the aforesaid writing obligatory or in the Condition thereof had been paid or satisfied or any Interest thereon) by a writing upon the said writing obligatory made with his proper hand subscribed and with the seal of him the said Samuel sealed bearing date the day and year last aforesaid according to the force form and effect of the act of Assembly aforesaid the said writing obligatory and the aforesaid sum of eight hundred and eighty five pounds current money therein mentioned unto him the said Allen did assign whereof the aforesaid William then and there had notice by virtue whereof and also by force of the act of Assembly in such case made and provided action hath accrued unto him the said Allen to demand and have of him the said William the aforesaid sum of Eight hundred and eighty five pounds current money.

Nevertheless the said William (altho often thereunto requested) the aforesaid sum of Eight hundred and eighty five pounds current money or any part thereof to him the said Allen hath not rendered or paid but the same to him hitherto to render or pay he hath altogether refused and still doth refuse to the damage of him the said Allen in the sum of two thousand pounds current money of Maryland and therefore he brings suit andsoforth and brings here into Court as well the writing obligatory aforesaid sealed with the seal of him the said William whose date is the day and year first aforesaid as also the Assignment aforesaid which the debt aforesaid in form aforesaid witnesseth andsoforth.

J. T. Chase for Pltff. Pledges &c. John Doe, Richard Roe.