which your Orator prays may be taken as part of this his Bill of Complaint, he begs leave to refer. Your Orator further sheweth that notwithstanding by the Deed before mentioned executed by Francis Spong and Elizabeth his wife, now Elizabeth Staines one of the Defendants herein named, the said Francis and Elizabeth conveyed and transfered all their right title and estate of in and to the said Lot to the Grantee therein mentioned, with a General Warranty and Covenant of further assurance, and received a valuable Consideration for the same, the aforesaid Thomas Staines and Elizabeth his wife, the Defendants, herein after named, sometime in the Month of July one thousand seven hundred and seventy nine, in the name of Thomas Staines and Elizabeth his wife their Lessee commenced an action of Trespass and Ejectment in the General Court for the Western Shore of the State of Maryland, against the aforesaid Bennett Chew, for the Recovery of the Lot of Ground aforesaid, under pretence that the said Elizabeth Staines at the time of the execution of the Deed before mentioned by her in the name of Elizabeth Spong, was under the age of twenty one years, and the said Lot was recovered and taken from him the said Bennett Chew on the twelfth day of October in the year one thousand seven hundred and eighty four, and Possession thereof delivered to them the said Thomas Staines and Elizabeth his wife as by the Transcript and Record of the said General Court hereunto annexed and which your Orator prays may be taken as part of this his Bill of Complaint may more fully appear.

Your Orator further sheweth that soon after the recovery of the Lot of ground aforesaid by the said Thomas Staines and Elizabeth his wife from the aforesaid Bennett Chew, they sold and conveyed the said Lot to John Rogers Esquire, by Deed of bargain and sale bearing Date on or about the day of one thousand seven hundred and eighty four for and in consideration of the sum of one thousand pounds current money and the aforesaid Bennett Chew soon afterwards commenced an action of covenant against your Orator as executor of the last will and Testament of Thomas Rutland late of Anne Arundel County deceased, and recovered Judgment against him for the aforesaid sum of six hundred and twenty six pounds sterling money of the value of one thousand and forty one pounds thirteen shillings and four pence current money, or by the record and proceedings of

of the General Court aforesaid, reference being thereunto had may appear. Your Orator further sheweth that he hath frequently requested the aforesaid Thomas Staines and Elizabeth his wife to make him compensation for the improvements erected and put on the Lot of Ground aforesaid by his grand father Thomas Rutland deceased, as before described as in Justice and equity they ought and are bound to do which the said Thomas and Elizabeth have refused to do and still refuse to make your Orator any satisfaction for the same, most unjustly; and that the aforesaid Thomas Staines and Elizabeth his wife have received the sum of pounds current money or thereabouts from the aforesaid John Rogers Esquire in part payment for the aforesaid Lot, and will in a short time obtain payment of the remainder, if not prevented by this honourable Court: all which actings and doings and pretences of the said Thomas Staines and Elizabeth his wife are contrary to Equity and good conscience, and tend to the manifest wrong and Injury of your Orator. In Tender Consideration whereof and for as much as your Orator is utterly remediless by the strict rules of the common Law, and is properly relievable in this honourable Court only, when Matters of this nature are properly cognizable: May it please your Honours, the premises considered, to grant to your Orator your Honours most gracious writ of Injunction to the said John Rogers Esquire and his assigns to be directed, commanding and directing him and them to forbear from the payment of any further sum of money to the said Thomas Staines and Elizabeth his wife, their heirs, executors, administrators and assigns, or to any other person or persons for them, or to their use, for, and on account of the purchase of the Lot of Ground aforesaid by him made of them the said Thomas Staines and Elizabeth his wife, until this honourable Court shall order and direct in the premises. And also that your Orator may have Compensation made him by the said Thomas Staines and Elizabeth his wife for the improvements erected and put on the Lot of Ground aforesaid by his grand father Thomas Rutland deceased, and that he may have such further and other relief in the premises as the nature of his Case may require and to your Honours shall seem meet. May it please your Honours to grant unto your Orator a writ of Subpena in the usual form, to the said Thomas Staines and Elizabeth his wife, directed commanding them under a certain paine therein to be inserted to be and appear before your Honours at a day certain, then to answer upon their Corporal Oath the several matters