John Gill of John's Lessee against John Matthews and Joseph Griffith

Be it Remembered, that heretofore to wit on the twelfth day of March in the year of our Lord one Thousand seven hundred and ninety four Richard Fen Lessee of John Gill of John by Robert Smith his attorney declared in the general Court here against John Den in a plea of Trespass and ejectment with a notice thereto annexed in form following to wit.

General Court, Western Shore of Maryland Baltimore County ss.

John Den late of Baltimore County yeoman was attached to answer unto Richard Fen of a plea wherefore with force and arms he entered into all that Tract or parcel of arable land called 'Hickory Bottom Corrected' lying in Baltimore County aforesaid, and contained within the following metes, bounds, courses and distances Viz: Beginning North three degrees West twenty four perches distant from the beginning tree of a Tract of Land called Mary's Meadow, and running thence bounding reversely on the given line of said land north three degrees West five hundred and forty perches to a stone marked with the letter N standing south three degrees East seventeen perches distant from a stone marked with the letters M M provided by John Kemp to stand at the place where James Everett twenty odd years ago ended the West one hundred and thirty five perches line of the aforesaid Tract of land called Mary's Meadow, thence West forty perches to a stone marked with the letters N C thence north four degrees East thirty seven perches south eighty seven degrees and thirty minutes west nineteen perches to a bounded white oak standing at the place where Richard Hooker proved that Nicholas Beaton Gay ended the last west line of a Tract of land called Nicholson's Manor, thence running with and bounding on the given line of Nicholson's Manor south seven degrees and forty five minutes east five hundred and twenty six perches and thence with a straight line to the first place of beginning containing one hundred and three quarters of an acre more or less, with the appurtenances which John Gill of John demised to him the said Richard Fen for a term of years which is not yet expired and ejected him from his said farm and other wrongs to him did to the great damage of the said Richard Fen and against the peace government and dignity of the State of Maryland and so forth. And whereupon the said Richard by Robert Smith his attorney complains that whereas the said John Gill of John on the first day of October in the year of our Lord one thousand seven hundred and ninety three at Baltimore County aforesaid had demised to the same Richard the Tract of land and premises aforesaid with the appurtenances, To have and to hold the said Tract of Land and premises with the appurtenances to the said Richard and his assigns from the day

(of)

of the date thereof to the full end and term of Ten years thence next following and fully to be complete and ended; by virtue of which demise the said Richard entered into the said Tract of land and premises with the appurtenances and was thereof possessed and the said Richard so being possessed thereof the said John Den afterwards, that is to say on the fourth day of October in the year aforesaid with force and arms and so forth entered in the said Tract of land and premises with the appurtenances which the said John Gill of John demised to the said Richard in form aforesaid, for the term aforesaid which is not yet expired, and ejected the said Richard out of the said tract of Land and premises with the appurtenances and other wrongs to him did to the great damage of him the said Richard and against the peace government and dignity of the State of Maryland; whereof the said Richard saith that he is injured and hath sustained Damage to the value of Ten Pounds current money of Maryland; and thereupon he brings suit and so forth.

Robt. Smith for Plff. pledges &c. John Doe & Richd. Roe

Mess. John Mathews &
Joseph Griffith Gentlemen

I am informed that you are in possession of or claim title to the premises mentioned in this Declaration of Ejectment or to some part thereof; and I being sued in this action as a casual Ejector and having no claim or title to the same do advise you to appear at the next general Court for the Western Shore of Maryland to be held at the City of Annapolis in Annearundel County on the second Tuesday of May next by some attorney of that Court, to cause yourselves to be made defendant in my stead: Otherwise I shall suffer judgment to be entered against me and you will be turned out of possession.

Yours &c. John Den

A copy of which said Declaration and notice was made and sent to the sheriff of Baltimore County aforesaid thereon endorsed 'To be served on the Defendants Tenants in possession or set up on the premises at least Eight days before Court'.

At which said Second Tuesday of May being the thirteenth day of the same month in the year of our Lord one Thousand seven hundred and ninety four, and the return day of the service of a copy of the aforegoing Declaration, comes into the general Court here the said Richard Fen Lessee of the said John Gill of John by his attorney aforesaid and the Sheriff of Baltimore County to whom a copy of the said Declaration in Ejectment and notice aforesaid was in form aforesaid made and sent certifies to the Court here the service thereof in form following to wit.

Service 11th April Robert Gorsach Sheriff

(Whereupon)