Cornelius Howard's Lessee
against
John Cromwell

Be it remembered that heretofore to wit on the seventh day of August in the year of our Lord one thousand seven hundred and ninety four, Thomas Goodwright Lessee of Cornelius Howard by Luther Martin his attorney, filed in the General Court here his Declaration against Henry Holdfast in a plea of trespass and ejectment with a notice thereto annexed in form following to wit

State of Maryland Baltimore County to wit, Henry Holdfast late of Baltimore county yeoman was attached to answer unto Thomas Goodright of a plea wherefore with force and arms &c. he entered into the following tracts of land called Howards Inheritance resurveyed, Water Oak Ridge and Rosland with the appurtenances thereto belonging situate in Baltimore county, which a certain Cornelius Howard demised unto the said Thomas for a term which is not yet expired, and ejected him from his said farm, and did other wrongs to him to the great damage of the said Thomas and against the peace Government and Dignity of the State of Maryland &c. And whereupon the said Thomas, by Luther Martin his attorney complains that whereas the said Cornelius Howard on the twenty second day of June in the year of our Lord one thousand seven hundred and ninety three at Baltimore county aforesaid hath demised to the said Thomas the said tracts of land called ~ Howards Inheritance resurveyed, Water oak Ridge and Rosland with the appurtenances for him the said Thomas and his assigns to have and to hold the said tracts of land with the appurtenances from the said twenty second day of June in the said year: to the full end and term of ten years, then next following and fully to be complete and ended. By virtue of which said demise the said Thomas entered into the said land with the appurtenances and was possessed thereof, and being so possessed thereof the said Henry afterwards that is to say on the tenth day of July in the said year, with force and arms entered into the said tracts of land with the appurtenances which the said Cornelius Howard demised to the said Thomas in the manner as aforesaid for a term which is not yet expired, and ejected the said Thomas out of his said farm, and did him other wrongs, to the great damage of the said Thomas and against the peace, government and dignity of the State of Maryland &c. whereby the said Thomas declares he is injured and endamaged to the value of one hundred pounds and therefore he brings this suit &c.

Luther Martin pro plaintiff

pledges for prosecuting { John Doe and Richard Roe

(Mr.

Mr. John Cromwell, Sir.

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 next October Term in the General Court held for the Western Shore of The State of Maryland, by some attorney of that Court, and then and there by a rule to be made of the same court, to cause yourself 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.

August 15th 1794 Your Loving friend Henry Holdfast

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 Defendant Tenant in possession or set up "on the premises at least eight days before court"

At which mentioned second tuesday of October being the fourteenth day of the same month in the year of our Lord one thousand seven hundred and ninety four, and the return day of a copy of the aforegoing Declaration in Ejectment, comes into the General Court here the aforesaid Thomas Goodright, Lessee of the aforesaid Cornelius Howard by Luther Martin his attorney aforesaid, And the Sheriff of Baltimore county aforesaid, to wit Robert Gorsuch, Gentleman 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,

Copy served 2nd October 1794. Robt. Gorsuch Shff.

Whereupon the aforesaid Thomas Goodright Lessee of the aforesaid Cornelius Howard by his attorney aforesaid prays that the said Henry Holdfast the Defendant the said John Cromwell the Tenant in possession of the said premises, or those under whom he claims to the Declaration aforesaid may appear: And thereupon the said John Cromwell by James Winchester his attorney in pursuance of the notice aforesaid comes into Court here, Whereupon it is ruled by the court here with the consent of the aforesaid Thomas Goodright Lessee of the aforesaid Cornelius Howard by his attorney aforesaid, and the said John Cromwell (who claims the title in question by his attorney aforesaid that the said John Cromwell be admitted Defendant in the place of the now Defendant, Henry Holdfast the casual Ejector, and that he immediately receive a Declaration and plead thereto the General issue and at the trial thereon to be had the said John Cromwell shall appear in his proper person or by his attorney or Counsel and confess the lease entry and actual

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