of offering herself in the Plea afs.d and complain in manner and form following to wit

Dorchester County to wit. Daniel Payne late of Dorchester County Planter was attached to answer unto Lucretia Harper of a plea of Trespass upon the Case and so forth. And whereupon the same Lucretia Harper by Gustavus Scott her Attorney complains that whereas he the same Daniel Payne on the first day of December in the year seventeen hundred and seventy eight at the County of Dorchester afs.d then being an unmarried Person at Dorchester County afs.d in consideration that she the same Lucretia Harper (then & yet being a Person unmarried) at the special instance and request of the same Daniel Payne had then & there agreed with the said Daniel Payne & then & there undertook and faithfully promised the same Daniel Payne that she the said Lucretia Harper would take the said Daniel Payne to be her husband & be coupled with him in lawful Matrimony he the said Daniel Payne undertook and then and there faithfully promised the same Lucretia Harper that he the said Daniel Payne would take the said Lucretia Harper to be his Wife and be coupled with her in lawful Matrimony And altho' she the same Lucretia Harper giving Credit to the said Promise and undertaking of the said Daniel Payne hath hitherto refused to contract Matrimony with other Persons who had offered to marry her and she now continues unmarried And altho' she the said Lucretia Harper hath always been ready and willing from the time of making the said Promise and undertaking to take to Husband and to be Married to the said Daniel Payne at the County of Dorchester afs.d according to the Tenor of her Promise and undertaking afs.d Nevertheless the same Daniel Payne not regarding his Promise and undertaking afs.d in form afs.d made but contriving and fraudulently intending craftily and subtilly to deceive and defraud the same Lucretia Harper in this particular and totally to hinder the same Lucretia Harper of her preferment in Marriage hath not taken the said Lucretia Harper to Wife according to his said Promise and undertaking made for that purpose as afs.d altho' there afterwards to wit on the second day of August in the year seventeen hundred and seventy nine and often since that time at the County of Dorchester afs.d he the same Daniel Payne by the same Lucretia Harper was required but hath since the making his said Promise to her the said Lucretia Harper to wit on the day and year last afs.d at the County afs.d intermarried with and taken to Wife a certain Rachel Pritchett who now is there in full life And whereas also the same Daniel Payne afterwards to wit on the first day of December in the year seventeen hundred seventy and Eight at Dorchester County afs.d in Consideration that she the said Lucretia Harper at the Special Instance & request of him the said Daniel Payne then and there undertook and to the same Daniel Payne faithfully Promised to marry him the same Daniel Payne he the same Daniel Payne undertook and faithfully promised the same Lucretia Harper that he the said Daniel Payne would be joined to her the same Lucretia Harper in lawful Matrimony And altho' she the said Lucretia Harper was always



ready and willing from the time of making her said Promise and Undertaking to be joined to the said Daniel Payne in lawful Matrimony to wit at the County afs.d Nevertheless the said Daniel Payne not regarding his said last mentioned Promise and Undertaking but contriving and fraudulently minding to deceive and defraud the same Lucretia Harper in this particular and totally to hinder the same Lucretia Harper from the Preferment & good fortune that she would have met with by such Marriage hath not taken to Wife the said Lucretia Harper but with her the same Lucretia Harper to be coupled in lawful Matrimony he the said Daniel Payne hath altogether refused and denied altho' he the said Daniel Payne afterwards to wit on the second day of August in the year seventeen hundred and seventy nine at the County afs.d and often times before and since that time by the same Lucretia Harper hath been required but he the same Daniel Payne to be coupled in lawful Matrimony with her the same Lucretia Harper hitherto altogether hath refused and denied afs.d Wherefore the same Lucretia Harper saith she is the worse and hath sustained Damage to the value of one thousand Pounds Current Money of Maryland Whereupon she brings Suit and so forth.

Gustavus Scott for Plaintiff. Pledges and so forth { John Doe & Richard Roe

And the afs.d Daniel Payne by his Attorney afs.d prayed further liberty of Imparling thereof there until the second Tuesday of April then next and he had it The same day was given to the afs.d Lucretia Harper there and so forth.

At which afs.d second Tuesday of April 1783 came the parties afs.d by their Attorneys afs.d And the afs.d Daniel Payne by his Attorney afs.d prayed further liberty of Imparling thereof there until the second Tuesday of September then next and he had it The same day was given to the afs.d Lucretia Harper there and so forth.

At which afs.d second Tuesday of September 1783 came the parties afs.d by their Attorneys afs.d And the afs.d Lucretia Harper by her Attorney afs.d Prayed that a Rule of Court be made for the afs.d Daniel Payne to file his Plea at the then next April Term and it was Granted unto her. Whereupon the same second Tuesday of September 1783 was Ruled by the Court there that the afs.d Daniel Payne should file his Plea and answer to the Declaration of her the same Lucretia Harper at the then next April Term at his Peril. And the afs.d Daniel Payne by his Attorney afs.d Prayed further liberty of Imparling thereof there until the second Tuesday of April then next and he had it The same day was given to the afs.d Lucretia Harper there and so forth.

At which afs.d second Tuesday of April 1784 came the Parties afs.d by their Attorneys afs.d And the afs.d Daniel Payne by his Attorney afs.d said that he did not Promise the said Lucretia Harper that he the said Daniel Payne would take the same Lucretia Harper to be his Wife in manner and form as she the said Lucretia Harper above against him had complained And of that he put himself on the Country And the afs.d Lucretia Harper in like manner and so forth. Therefore a Jury was ordered to come before the Court there the second Tuesday of September then next Twelve &c. Who neither &c. To Recognize &c. Because as well and so forth. the same day was given to the afs.d Daniel Payne there &c.

And now here to wit the second Tuesday of September 1784 cometh the Parties