Plaintiff, and against all and every other person whatever, and that they the said John & Mary never did at any time, during all the time last aforesaid, permit or suffer him the said Edward the Plaintiff, or any other person to enter into, or hold, or possess any part of the aforesaid Lands, or to receive and take the profits thereof, or of any part thereof; but the said John & Mary during all the time last aforesaid, did and have prevented & hindered the aforesaid Edward Lloyd the Plaintiff, & every other person, from entering into or holding, or possessing, or taking the profits of any part of the same Lands; & the right & title of the said Edward Lloyd the Plaintiff and every other person to the same Lands, or any part thereof, they the said John and Mary during all the time last aforesaid constantly have, & still do deny, to wit, at the County aforesaid without that, that the said Edward Lloyd & the aforesaid John Gordon & Mary his Wife do hold together & undivided, on the day of the Impetration of the original Writ of the said Edward in this cause, did hold the several Lands aforesaid in the writ and Declaration aforesaid mentioned with the Appurtenances or any part thereof, together and undivided, as the said Edward by his said Writ and declaration above doth suppose: And this the said John and Mary are ready to verify, wherefore they pray Judgment if Partition between them the said John and Mary and the said Edward Lloyd of the Lands aforesaid with the Appurtenances to be made ought, &c.

Robert Goldsborough for the Def.

And the same John Gordon and Mary his Wife, by their said Attorney prayed that the said Edward Lloyd to their said plea might reply: Whereupon it was ruled by the Court at the prayer of the said John and Mary that the said Edward Lloyd should answer to the Plea aforesaid, by the second Tuesday in September then next; and it was said to the same Edward Lloyd, that if he should not answer to the Plea aforesaid by the Time aforesaid, Judgment should be rendered against him by default. The same day was given to the said John Gordon and Mary his Wife, then, &c.

At which said second Tuesday of September, seventeen hundred & eighty six; came again the parties aforesaid, by their Attornies aforesaid. And the said Edward Lloyd by his Attorney aforesaid filed here in Court the following Replication, to wit.

And as to the first Plea of the same John Gordon and Mary his Wife, the same Edward Lloyd in like manner, &c.

And as to the second Plea of the same John Gordon and Wife in manner & form above pleaded the same Edward Lloyd saith, that he by any thing in that Plea alledged to be precluded from having his Writ of Partition aforesaid against the said John Gordon and Mary his Wife of the aforesaid Lands & each and every of them in the writ and Declaration aforesaid mentioned ought not, because he saith that he the said Edward Lloyd and the said John Gordon & Mary his Wife, on the day of the impetration of the original Writ in this Cause, to wit, on the

day of in the year, seventeen hundred & at Talbot County aforesaid, did hold together, & still do hold together and undivided the several Lands and premises and each of