And the said Robert Lloyd Nicols, David Kerr and Thomas Chamberlaine by their Attorney aforesaid affiled their Declaration in the Plea aforesaid against the said John Turner in manner and form following, to wit. —

Talbot County, to wit, John Turner late of Talbot County, Planter was summoned to answer unto Robert Lloyd Nicols, David Kerr and Thomas Chamberlaine of a plea that he render unto them the sum of one hundred and one pounds, eleven Shillings and two pence current money which to them he owes and unjustly detains and &c. And whereupon the said Robert Lloyd, David and Thomas by William Hayward Junior their Attorney say that whereas the aforesaid John on the Seventeenth day of September in the year Seventeen hundred and eighty five at the County aforesaid by his certain writing obligatory acknowledged himself to be held and firmly bound unto the said Robert Lloyd, David Kerr and Thomas in the aforesaid sum of one hundred & one pounds eleven Shillings and two pence current money, to be paid to the said Robert Lloyd, David and Thomas when afterwards he should be thereunto required: Nevertheless the said John (although often thereunto required) the aforesaid sum of one hundred and one pounds eleven shillings and two pence current money to the said Robert Lloyd David and Thomas or either of them hath not rendered or paid, but the same to them hitherto to render or pay he hath altogether refused and still doth refuse, wherefore they say they are the worse and have Damage to the value of Two hundred pounds current money &c. and therefore they bring Suit and so forth: and bring here into Court the writing obligatory aforesaid sealed with the Seal of the aforesaid John Turner which the Debt aforesaid in form aforesaid witnesseth the Date whereof is the same day aforesaid and so forth —

John Doe } Pledges of Prosecution —
Richd. Roe }

Wm. Hayward Junr. for the Plff.

The writing obligatory whereof mention is made in the Declaration aforesaid in the following words and figures, to wit, Know all Men by these presents that I John Turner of Talbot County Gentleman am held and firmly bound unto Robert Lloyd Nicols, David Kerr and Thomas Chamberlaine in the just and full sum of One hundred and one pounds eleven shillings and two pence to be paid unto the said Robert Lloyd Nicols, David Kerr and Thomas Chamberlaine their certain Attorney Executors Administrators or Assigns: To which payment well and truly to be made and done I bind myself my Heirs Executors and Administrators firmly by these presents sealed with my seal and dated this 17th day of September Anno Domini One thousand seven hundred and eighty five —

The Condition of the above obligation is such that if the above bound John Turner do and shall well and truly pay or cause to be paid unto the said Robert Lloyd Nicols, David Kerr and Thomas Chamberlaine their certain Attorney Executors Administrators or Assigns the just and full sum of fifty pounds fifteen Shillings and Seven pence Current Money with legal Interest for the same then the above obligation to be void else to remain in full force — John Turner (Seal)

Signed Sealed & delivered in the presence of Jeremiah Banning Junr. —

And the said John Turner by his Attorney aforesaid defended the force and injury when &c. and prayed the liberty of imparling thereof untill the Monday before the first Tuesday in June then next following and it was granted unto him the same day was given to the said Robert Lloyd Nicols, David Kerr and Thomas Chamberlaine there &c. At which day, to wit, the said Monday before the first Tuesday in June here came again as well the said Robert Lloyd Nicols David Kerr and Thomas Chamberlaine as the said John Turner by their Attorneys aforesaid, and the said John Turner prayed the further liberty of Imparling thereof untill the Monday before the first Tuesday in November then next following, and it was granted unto him the same day was given to the said Robert Lloyd Nicols, David Kerr and Thomas Chamberlaine there &c. And now at this day to wit, the said Monday before the first Tuesday in November in the year Seventeen hundred and eighty seven here came again as well the said Robert Lloyd Nicols, David Kerr and Thomas Chamberlaine as the said John Turner by their Attorneys aforesaid, and the said John Turner by his Attorney aforesaid produces to the Court here a Writ of Habeas Corpus of the said State of Maryland to the Justices and Sheriff aforesaid directed the tenor whereof follows in the following words and figures to wit, — The State of Maryland. To the Justices and Sheriff of Talbot County Greeting: Whereas a certain John Turner is detained in the prison of our said County under the Custody of you our said Sheriff at the suit of Robert Lloyd Nicols, David Kerr and Thomas Chamberlaine of a Plea that he render unto them the sum of One hundred and one pounds eleven shillings and two pence current money which said plea as it is said still depends before you our said Justices undetermined, and we being willing for divers causes