

To the Honorable Alexander Hanford Esquire Chancellor of Maryland.

Humbly complaining I shew the unto of your Honor your Obedient  
Matthews Clark of Saint Marys County.

That a certain Jonathan Bycoe late of Queen  
Anns County deceased in his life time was seized in fee simple of a tract of  
Land lying in Saint Marys County in the State of Maryland called and  
known by the name of Robinsons Oak and lying on the South Side of Smiths  
Creek containing fifty Acres more or less and being so seized, did on the Twen-  
ty sixth day of June in the year of our Lord one thousand seven hundred  
and eight six pass his Bond unto a certain James Bycoe of Saint  
Marys County to convey the said Land to the said James Bycoe  
his Heirs and Assigns for ever a Copy of which Bond is here in the  
produced marked No. 1 which your Obedient prays may be taken as  
part of this His Bill of Complaint and the said Jonathan immediately  
upon the Execution of the said Bond gave possession of the said Land  
to the said James Bycoe. Your Obedient further states that the said  
James Bycoe by an Instrument on the back of the said Bond dated  
the ninth day of April one thousand seven hundred and ninety six assign-  
ed all his right Title and Interest to the said Bond and the Lands there-  
in mentioned to your Obedient and immediately delivered to your Obedient pos-  
session of the said Land and your Obedient herewith exhibits a Copy  
of the said Instrument marked No. 2 and which your Obedient prays  
may be taken as part of his Bill of Complaint and your Obedient expresses  
ly states that he paid the said James Bycoe the sum of three hun-  
dred and thirty seven pounds ten Shillings Current Money as a Con-  
sideration for the said Assignment. That the said Jonathan Bycoe  
did not take place the Operation of an Act of Assembly entitled an  
Act to direct Discontents passed in the year one thousand seven hun-  
dred and eight six, without conveying the said Land to the said James  
Bycoe or your Obedient, leaving John Bycoe Henry Bycoe, Miller



Bycoe, Mary Bycoe and Ignatius Bycoe and William Bycoe, his Sons  
and daughters, his Coheirs; that the said John Bycoe and Henry By-  
coe afterwards died intestate, leaving the said Marrison Bycoe, Mary By-  
coe, Ignatius Bycoe and William Bycoe the Defendants herein a  
bove, their Coheirs; And your orator further states that he has never  
yet obtained any Conveyance of the said Land owing to the Infancy  
of the said Mary, Ignatius, and William

In tender Conspiration whereof and for as much as your orator is without  
remedy, except by the Aid and Assistance of this Honorable Court, where  
matters of this nature are properly cognizable and releasable. To the End  
therefore that the said Marrison Bycoe, Mary Bycoe, Ignatius Bycoe  
and William Bycoe may upon their corporal Oaths give direct and  
perfect answers make to all and singular the matters aforesaid and that  
as fully and particularly as if the same were again here repeated and  
interrogated. And more particularly that the said Marrison Bycoe, Ma-  
ry Bycoe, Ignatius Bycoe and William Bycoe may set forth and  
discover whether the said Jonathan Bycoe in his life time did enter  
into such Bond as herein before is mentioned to convey the said Land to the  
said James Bycoe his Heirs and Assigns or any other and what Agree-  
ment and whether the said James Bycoe did not assign all his  
right Title and Interest in the said Bond to your orator; and whether  
the said James Bycoe and your orator have not been in possession  
of the said Land since the Execution of the said Bond or for a great  
length of time and how long, whether the said Jonathan Bycoe did not  
die intestate and when, and who was his Coheir, and whether the said  
John Bycoe and Henry Bycoe did not die intestate and when  
and who were their Coheirs - Therefore may it please your Honor  
to grant unto your orator a writ of Subpoena to be directed to the  
the said Marrison Bycoe, Mary Bycoe, Ignatius Bycoe and William  
Bycoe of Queen Anns County commanding them and each of them  
to be and appear before this Honorable Court to answer the premises



Matthews Clarke

vs.

Mellison Biscoe

Mary Biscoe

Ignatius Biscoe

and  
William Biscoe

Bill -

1798

Mr. Howard.

File this & Issue

Subpoena to Quere

Ans' Court

W. D. Dwyer

Filed June 19. 1798

Subst if -



and that the said Milleron Bycoe, Mary Bycoe, Ignatius Bycoe and  
William Bycoe may be compelled to a specific performance of the  
said agreement and may execute a proper deed or conveyance of the  
said Land to your Orator his heirs and assigns according to the true  
true intent and meaning of the Said Bond and that your Orator may  
have such other and further relief in the premises as to your Honor  
shall seem meet and he as in duty bound will pray.

Walter Dorsey for Complainant

Exhibit No. 1.

Know all men by these presents that Jonathan Bycoe formerly of St. Marys County and  
State of Maryland but now of Queen Anns County and State aforesaid, an Heir and family  
bound unto James Bycoe of St. Marys County an d State aforesaid in the full and just sum  
of one thousand pounds lawful money of Maryland to be paid the said James Bycoe his Heirs  
Executors Administrators or assigns to the which payment well and truly to be

I bind myself my Heirs Executors and Administrators firmly by these presents sealed with  
my Seal and date this twenty sixth day of June one thousand seven hundred and  
eighty six

Now the Condition of the above obligation is such that if the above bound Jonathan  
Bycoe his Executors or Administrators shall and do well and truly make  
a true and lawful conveyance of a certain tract of Land lying and being in the  
County aforesaid called and known by the name of Arbitious Oak lying on the South

side of Smiths Creek containing both acres more or less unto James Bycoe Junr: his  
heirs and assigns for ever with all the appurtenances thereto in full possession and  
fully warrant and defend the aforesaid land and Premises to the said James  
Bycoe his Heirs and assigns for ever against him the said Jonathan

Bycoe his Heirs Executors and Administrators that then the above ob-  
ligation to be void else to remain and be in full force and virtue in Law.

Signed Sealed and delivered in the presence of } Jonathan Bycoe. (Seal)  
of Beck? Barabouse, Joseph A. Thoms }

Exhibit No. 2.

I James Bycoe of Saint Marys County State of Maryland for value  
received assign and make over unto Matthias Clarke of the County and  
State aforesaid, his Heirs or assigns all my right title and Interest of  
the within Bond. Witness my Hand and Seal this ninth day of April one thou-  
sand seven hundred and ninety six.

James Bycoe (Seal)  
Test. Thomas Davis. Isaac Larner.