To the Honourable Theodorick Bland Chancellor of Maryland.

The Bill of Complaint of John Osborn and James Osborn and Prusilla his wife of Anne Arundel County respectfully represent that a certain Francis Osborn late of the County aforesaid deceased, having in his life time become security for a certain Basil Bowling elected Sheriff of Prince George County in the Bond given by him for the faithful performance of his duty as Sheriff of said County, and afterwards apprehending that he might be subjected to loss and injury in consequence of his suretyship as aforesaid, with a view as your Complainants have been informed and believe, to exempt his property from being seized upon by those who might obtain Judgments against the said Bowling and his securities, did in his life time to wit, in the year Eighteen hundred and twenty one or Eighteen hundred and twenty two, execute to a certain Jeremiah Berry of the City of Baltimore a Deed or Bill of Sale of certain negroes and other property therein particularly set forth and described, and for a certain nominal consideration also therein named, which said Deed or Bill of Sale has never been recorded agreeably to the Laws of this State (although the said Francis Osborn during his life time, retained possession of the property mentioned in the said Deed or Bill of Sale) and that the said Instrument of writing so executed as aforesaid, is now in the possession of the said Jeremiah Berry.

Your Complainants further state, that a short time after the execution of the Deed or Bill of Sale as aforesaid, the said Jeremiah Berry combining and confederating with a certain Joshua Osborn, a Son of the aforesaid Francis Osborn, with a view not only to defraud the creditors of the said Francis Osborn, but also his children from any part or participation of his property, did by a Bill of Sale bearing date the seventh day of February Eighteen hundred and twenty two, and for the nominal consideration of two thousand and five hundred dollars therein expressed, bargain and sell to the aforesaid Joshua Osborn the same negroes mentioned in the Bill of Sale or Instrument of writing executed as aforesaid, by the said Francis Osborn in his life time to the aforesaid Jeremiah Berry as by reference to a Copy of said Bill of Sale hereunto exhibited marked A will appear to which your Complainants refer and pray that the same may be taken as part of this their Bill of Complaint.

Your Complainants further state, that the said Deed or Bill