

the said Thomas Hammond in pursuance of the said agreement
 give said land & premises to your Petitioner Charlotte L. Wood and in
 part. Execution of said agreement upon his part and as referring thereto
 and resulting, therefore placed your Petitioner in Possession thereof, as
 absolute owner in fee that, have said time, your Petitioner has been in actual
 possession use & enjoyment of said land & premises, claiming and using the same as
 Sole owner thereof, that, said possession use enjoyment & claim of Sole ownership
 thereof, by your Petitioner were fully known to said Thomas Hammond who
 not only, acquiesced therein but on divers occasions expressly declared that he
 had given said land & premises to your Petitioner and that she was the owner
 thereof, & that she could do therewith, whatever she saw fit that this Petitioner
 bearing entire faith, in and relying with, implicit confidence upon the
 word and promises of the said Thomas Hammond & never doubting that
 the said land & premises were his own and that the said Thomas Hammond
 would in due time Execute, to, her a proper deed therefor did lay out, & spend
 large sums of money, in improvements therewith, the full knowledge
 & concurrence of the said Thomas Hammond, which, she, otherwise would
 not have done that at the time of the said gift of said land and premises
 by said Thomas Hammond to your Petitioner and of his placing her in possession
 thereof, the pecuniary ability of the said Thomas Hammond, was ample, to,
 enable him to withdraw the amount, of the, purchase money, for said land &
 premises from his Estate, without, the least, hazard to his creditors
 or in any, material degree lessening their then prospects of payment. This
 Petitioner further represents unto your Honors that on the 13th day, of June
 1874 the said Thomas Hammond conveyed to a certain Dawson V. Hammond
 the said Real Estate, which he had previously, give to your Petitioner as
 aforesaid, and that, the legal title, to said Real Estate, still remained
 in said Dawson V. Hammond by virtue of said deed of conveyance a
 copy, of which said deed is filed in this cause & marked Exhibit No 5,
 & which is prayed to be taken be part of this Petition your Petitioner further
 represents unto your Honors that on the 1st day, of Sept, 1876, a bill was
 filed in your Honorable Court, being No. 4483, Equity the same in which
 this Petition is filed to which cause your Petitioner the said Dawson V.
 Hammond were parties and in which the title to said Real Estate
 was brought, into dispute, that subsequently, on the 24th, day, of, June 1878
 a decree was passed by, your Honors, in said cause whereby it was
 decreed that, the title, to said Real Estate, was in your Petitioner by,
 virtue of the said gift, by the said Thomas Hammond, to, her as aforesaid as
 will appear reference being had to said decree filed amongst, the proceedings
 in this cause which decree is now in full force & unrevoked not having been
 appealed from & the time for such appeal having expired, to the end therefore
 that, your Petitioner may, have a decree of your Hon. Court, Ordering & directing
 & directing the said Dawson V. Hammond to convey to your Petitioner by a
 good & sufficient deed said Real Estate, so as aforesaid conveyed by, said
 Thomas Hammond to her, or that, your Petitioner may, have such further
 & other relief to which she may, be entitled, may it please your Honors to
 grant, unto your Petitioner the writ of, Subpoena directed to said Dawson

Answer of
 Dawson V.
 Hammond

Decree