

Liber of land the said Gerrard thereupon proffered to sell vnto yo^r pet^r
P. C. R. the rights of five thousand acres of land which as he alleadged unto
yo^r pet^r was due unto him whereupon yo^r pet^r bargained
with him some- in the yeare of our lord 1659 for some-
p. 1040 tymes in Aug. . . . be betweene two or three thousand acres of good
land of itt, for which very tract yo^r pet^r bought the Residue of the
afores^d rights of five thousand acres of land & the rights for 350
acres of land which Rights the said Gerrard had for 7 of his Serv^{ts}
transportacōn into this Province, and the tyme Lymited yo^r pet^r for
satisfaccōn for the fore mencōned rights more att large will appeare
by yo^r pet^{rs} severall bills deliuered into the Clarks office att the
Penultima Pro^{all} Co^{rt} Att which Co^{rt} the said Gerrard sued yo^r pet^r
& obteyned an order of Co^{rt} for the said tobacco, where yo^r pet^r sued
alsoe the said Gerrard in an accōn of the Case for the performance
of his Condiçōn contracted with yo^r pet^r where itt was alsoe ordered
that the s^d Gerrard should make good vnto yo^r pet^r the said Rights
of five thousand acres of land the performance whereof yo^r pet^r
afterwards demanded of the said Gerrard, and as yett remayneth
vnperformed whereupon yo^r pet^r not haueing his damages adjudged
and ordered by yo^u (most renowned fathers of this Province) could
not demand an Execucōn upon the said order of Co^{rt} but to yo^r pet^{rs}
greate losse and damage; as more att large will appeare by the
Subsequent lines for after yo^r pet^r had an Assignm^t for the fore-
menconed rights of three thousand three hundred & fifty acres of
land yo^r pet^r came downe unto the then Secretarys office for a
warr^t for the said rights, but the then Secretary now Chancellor of
this Province would not grant unto yo^r pet^r a warr^t for the s^d rights
of three thousand acres of land the remaynder of the before men-
coned five thousand, but shewed yo^r pet^r a paper from M^r Marmaduke
Snowe to clayme the rights of land granted unto his brother
M^r Abell Snowe by speciall warr^t from the Right hono^{ble} the Lord
Prop^{ry} of this Province of Maryland which were the rights before
mencōned of five thousand acres of land sould by the said Gerrard
unto yo^r pet^r and for the defaulte of the s^d warr^t by reason of the
said Gerrards un- to the said rights of yo^r pet^r formerly
p. 1041 tooke up and the water side besides the damage yo^r pet^r hath sus-
teyned by the depriuacōn of takeing up of the residue of the fore
mencōned rights w^{ch} might haue redowned much to yo^r pet^{rs} proffitt
all which yo^r pet^r humbly craues to haue bin his apparant yett
recouerable damage.

The p^rmisses therefore being taken into yo^r hon^{oble} serious con-
sideracōns yo^r pet^r most humbly craueth an order of Co^{rt} whereby the
said Gerrard may be enforced to purchase the aboue mencōned Seates
of land & possess yo^r pet^r his heires & Assigns for ever therewth and
that the said Gerrard by vertue of the s^d order of Co^{rt} may be bound
his heires Ex^{rs} Adm^{rs} & assigns vnto yo^r pet^r his heires Ex^{rs} Ad^{rs}
and Assigns in a bond of three hund^d pounds sterl. money to warrant