

The Lord Proprietary Comp^{lt} } Day being given to both parties untill
 ag^t } this day to witt the twelfth day of
 Thomas Gerard def^t } May in the yeare aforesaid Att
 which said 12th day of May came the said Thomas Gerard by Robert
 Carville his Attorney and Saith that neither the Said Letters pattents
 of his said Lop^{pp} the Lord proprietary of the said foure hundred
 Acres of land called the Meadows in forme aforesaid made to the
 said Thomas Gerard Esq^o ought not to be revoked and adnulled
 nor the same into the hands of his said Lop^{pp} ought to be seized
 because he saith that at the time of the takeing Up of the said Land
 by the said Thomas Gerard Esq^o according to his Lop^{pps} Conditions
 of plantation nor at the time of the certificate of Survey nor granting
 of the said letters pattent nor a long time after there was not any
 record of any reserve made by his Lop^{pp} of any land whatsoever
 to be Surveyed and laid Out for his Lop^{pps} Use and to be called
 Chaptico Mannour of which the said foure hundred acres of land in
 the scire facias is alleadged to be part nor was there at the time
 aforesaid any legall Survey for the takeing Upp and laying Out
 for the said Lop^{pps} Use any such land as Chaptico Mannour in which
 it included the said four hundred Acres as by the said Scire facias
 as pretended nor was the said four hundred acres of land called the
 meadowes any part or parcell of the said Mannour of Chaptico
 according as the said Mannour at the time of the said Thomas
 Gerards Survey and pattent granted was laid Out and reserved But
 the said four hundred Acres of land was duly and according to his
 Lop^{pps} Conditions of Plantation taken up and pattented by the
 said Thomas Gerard Esq^o and by him by Indenture duly executed
 beareing date the ninth day of January 1671 for a good and valuable
 Consideration paid and secured to be paid unto him the said Thomas
 Gerard legally conveyed to and settled upon the def^t Thomas Gerard
 and he by Virtue thereof is become seized in ffee of the premises
 and Ought to hold and enjoy the same according to the said In-
 denture and Pattent which pattent Ought not in Law or equity
 by any private Act or instructions but what shall be Sufficient
 matter of record and ariseing before the said Certificate of survey
 made for Thomas Gerard Esq^o and Pattent thereupon duly Obtained
 be any wais avoided or sett aside And he is ready to averr and de-
 mands the judgment of this Court whether the said Letters Pattents
 & for the said four hundred acres of land called the Meadows so
 as aforesaid made ought to be revoaked or adnulled or the said
 Lands seized into the hands of the said Lord Proprietary &^e

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And the said Lord Proprietary by Vincent Lowe Esq^o his Lop^{pps}
 Attorney Gen^{ll} saith that the said Letters pattent of him the said
 Lord Proprietary to him the said Thomas Gerard Esq^o in forme
 aforesaid granted for the said foure hundred acres of land called