

Attorney aforesaid and according to the act of Assembly in that Case made and Provided Intituled an act for appeales and Regulat-
ing writts of Error. Offereth to the Court here for Cause and reason of her the said Susanna's appealing from the Judgment of the said Court of Baltemore County aforesaid ffor that y^e Record & Proceedings before Recited are manifestly Erroneous and Coran Non Iudice: Liber W. C.

(1st)—ffor that the p^{ts} by their Declareing that the said Mary haveing Served the sd susanna the full time of foure yeares as by Indenture may more at Large appeare, the w^{ch} time being Compleated and Ended the Eight and Twentyeth day of september then last past & haveing then at that time Demanded her freedome she the said Susanna unjustly denyed the same & Wittingly forced the said Mary without her free will or Consent to Continue in the said susanna's Service from the Date aforesaid untill the 29th of December w^{ch} was three compleate Moneths. ffor for wch service she hath Demanded of the said Susanna the sume of ffoure hundred pounds of tobacco w^{ch} she unjustly refused to pay The said Susanna Sayth that the matter in Question arriseing upon the said action is whether she did unjustly Detaine or not, or whether she was free or not free or whether there was an Indenture or noe Indenture, & also touching the said Indenture of Servitude whether the same were a good Indenture & valid in Lawe or not All w^{ch} was not within the Jurisdiction of the s^d County Court of Baltemore nor could they hold plea thereof, and Soe the same matters in the Record aforesaid was Coram Non Iudice

(2^{dly}) She saith that the said P^{ts} have not alleadged that they bring into Court here the said Indenture w^{ch} they Ought to have done that the same might there remaine and the Deft had Oyer thereof w^{ch} is Error

(3^{dly}) Itt doth not appeare that there was any proof made of ye said Indenture to warrant the Verdict afores^d soe that the Jury have Judged her free w^{thout} Sufficient Prooffe w^{ch} is Error

And thereupon the said Susanna for the Causes and reasons aforesaid prayeth y^e Proceedings aforesaid & Judg^t thereupon may be Quashed adnulled and made Voyd & that she unto all w^{ch} by Occasion thereof hath Sustained may be restored

And the said John Nicholls by Robert Ridgely his Attorney p. 509
cometh and Defendeth the force and Injury when &c and prayeth Liberty to imparle hereunto untill next Provinciaall Court and it is granted unto him the same day is Given to ye p^t also:

Now here att this day (to wit) the seaventh day of March in the seaventh yeare of the Dominion of the Right hono^{ble} Charles Lord Baltemore &c^a Annoq Dni. 168i Came the said partyes by their Attorneys aforesaid And the said John Nicholls by his Said Attorney Sayth: That the appeale of the said Susanna from the Judgm^t of ye County Court of Baltemore County Given on the