

said Charles Botler's own hand might be lodged amongst the Records of the Provincial Court or otherwise preserved from Imbezelment for the better Illustration of the truth of your Orator's cause but So farr did the interest of the said Charles Carroll prevaile above that of your Orator that the s^d Roger Brooke or others that own'd the Said Platt were prevailed upon by the said Charles Carroll to conceal the Same So that your Orator cou'd not obtain the effect of his So reasonable request tho he offered to be at all charges that should arise thereon Wherefore for that the proceedings of the Said Charles are altogether unjust and the verdict of the said Jurors false and illegall but that your Orator is not otherwise relievable Save before your Excellency in this Hon^rble Court were [sic] the Verdict of the said Jury may be examined according to the rules of [345] Equity and good Conscience The practice of attainting Jurors not being at yet introduced here And to the end that the s^d Charles may answer all and Singular the premisses and also that the S^d Charles may bring into this Hon^rble Court the Originall Platt of the lands afd or otherwise Set forth what is become of the Same or what he knows of it and generally to answer all and Singular the premisses and particularly whether he do's believe that the Tree which your Orator alleged to have been bounded for the first tree of Amptill Grange where the Plumb tree now Stands was not actually bounded by the s^d Charles Boteler the Surveyour for the first bounded Tree of the said Land of Amptill Grange when he first Surveyed it Also what was the date of the Certificate of Enfield Chace who it was that put him upon molesting your Orator. or what were his motives So to do whether he does not believe your Orator's pretensions to be more agreeable to the certificates of Survey of all the contiguous lands than those of his own making and whether the Evidences examined at the Barr did not Satisfye him in point of conscience that he was mistaken in his pretensions and whether he does not really believe that the S^d Jurors were mistaken or mislead in their Verdict Your Orator humbly prays your Excellency to grant him his Lordships Writts of Injunction to be directed to the said Charles Carroll thereby Commanding him at a certain day personally to be and appear before your Excy in this Hon^rble Court then and there to answer all and Singular the premisses and further to Stand to and abide Such further order rule direction and Decree therein as to your Excy shall Seem meet. And your Orator as in duty bound Shall ever pray etc.

Th Bordley per Compl^t

The answer of Charles Carroll Defendant to the Bill of Compl^t of Tho^s Wells jun^r.

The Said Defend^t Saving to himself now and at all times hereafter the benefite and advantage of exception to the many Imperfections incertintyes and insufficiencies of the Complainers Said Bill of Compl^t for answer thereunto or unto So much thereof as this defendant is advised as any way materiall for him to make [346] answer unto He answereth and Sayeth That he