

doth admitt that the Complt may think himself Seated on the North west-  
ermost part of Amptill Grange and might consequently make some Improve-  
ments as Judging himself Intituled thereto but that the land in Dispute is  
any part of Amptill Grange this defendant doth deny, but is within the de-  
fendants land called Entfield Chace and when the Complainant could not by  
any means be prevailed on to do the defendant Justice in forbearing to tres-  
pass on, and wear out his land, cutt down his timber and do him Severall  
other damages The defendant was forced to bring an Ejectment against him  
in the Provincial Court, the Complainant there takeing defence upon him,  
that a resurvey was ordered as usuall in Such cases and that Benj<sup>a</sup> Berry the  
Survey<sup>r</sup> laid out the Pretentions of the Complt and this Defendant and ad-  
mitts that Ja<sup>s</sup> Carroll the defendants Nephew, might give Some assistance in  
the doing thereof which as this defendant believes noe way affected the Merit  
of the cause, that the Sole Scope of the Dispute was about the place where the  
first bounder of Amptill Grange Stood, which the record of the original Sur-  
vey as well as the Record of the Survey of a Tract of land called Essington to  
which it has reference mentions it to be by Patuxent River Side, and not at  
any distance from it, were a Plumb tree may now stand, but does not believe  
that ever Charles Buttler the Survey<sup>r</sup> bounded a White Oak there for the  
first bounder of Amptill Grange, being directly contrary to his own return  
recorded, and upon oath, nor does he admitt the truth of what is Suggested  
in the Bill to have been by s<sup>d</sup> Buttler, relating thereto, being inconsistant  
with his own return, what trees were Sliped or Notched, by any man that  
Marked to the River Side, or whether any Such be now standing the de-  
fendant knows not and does not admitt that the proof thereof (all circum-  
stances considered) was So farr as to Divest the deft of his Inheritance as he  
Questions not to make appear before your Ex<sup>cy</sup> as all that the other Sug-  
gestions of proof in the Comp<sup>ts</sup> bill do not amount to Such an Evidence, as  
law or Equity requires to Sett aside the defendants right, and Denys that the  
Suggestions made by his Council and himself at the barr, he believes were  
well grounded and Supported but what any of the Jurors might say in [347]  
their Chamber he knows not, altho' Some days after they gave their Verdict,  
for the Defendant he heard Some of them Say, that if Verdicts were given  
ag<sup>t</sup> Such proofs as were brought by this Defendant there would be little Se-  
curity, for any Maryland inheritance As to the Originall platt made and  
Delineated by Charles Botoler who surveyed the Tract of land called Amptill  
Grange, when the same was taken up the Defendant is So farr from con-  
cealling the Same, or being Careless thereof that he Shall be ready to pro-  
duce it at the Tryall, and thereby Questions not demonstratively to make  
appear that his pretentions most exactly agree to and Square with what was  
originally done by the Very Survey<sup>r</sup> himself at the laying out of the land,  
and as to his beliefe of the tree, where the plumb tree may Stand he Verily  
believes it never was bounded for Amptill Grange at the taking up thereof