

All orders and decrees in Chancery may be altered, revised, or revoked during the term at which they have been passed, on motion or petition; but after the term, the party can only obtain relief by original bill or bill of review. (b)

Relief against a decree obtained by fraud can only be obtained by original bill, not by a mere bill of review.

A decretal order, in England, is most commonly that which is drawn up as the substance of, and as preparatory to a final decree; and it may in some respects be enforced as a final decree. Here no such decretal order is ever made.

A bill of review lies after the decree is signed and enrolled, and it is considered as enrolled after it is signed by the Chancellor and filed by the Register. (c)

Restrictive orders staying the Court's own decrees treated as injunctions.

A bill of review, or the like, does not of itself operate as a suspension of the execution of the decree complained of.

When a bill may be taken *pro confesso*. (d)

It is stated in the bill, which was filed on the 14th of July, 1823, that in the year 1803 Jesse Burch died intestate, and that administration on his personal estate was granted by the Orphans' Court of Washington County, in the District of Columbia, to his widow, Jane Burch, who took possession of his personal estate accordingly: among which personalty were three negro slaves, as mentioned in the inventory returned by her; that since the death of the intestate, Jesse, those negroes had several children; that

113 * the administratrix, Jane Burch, having died intestate, letters of administration on her personal estate were granted by the Orphans' Court of Washington County, in the District of Columbia, to Thomas Burch; and on the same day, and by the same Court, administration *de bonis non* of the effects of the late Jesse Burch, was granted to the same Thomas Burch; (e) that it had not been found necessary to make sale of those negroes to pay the debts of the late Jesse Burch; but, owing to the conduct of one of the sureties in the administration bond, Kinsey Gittings,

(b) See *Hollingsworth v. McDonald*, 2 H. & J. 230, note.

(c) Equity Rule, 50, provides that all final decrees, and orders in the nature of final decrees, shall be considered as enrolled from and after the expiration of thirty days from the date of the same, the day of the date inclusive.

(d) Cited in *Wampler v. Wolfinger*, 13 Md. 346. See Equity Rule, 12.

(e) Upon letters granted in the District of Columbia, the executor or administrator is, by the Act of 1813, ch. 165, authorized to sue here; although upon such letters granted here, he cannot sue there, 1 *Cran.* 259. But no suit can be sustained here by any one, on letters of administration granted in a foreign country; 1 *Hayw.* 355; 3 *Bac. Abr.* 36; *Mitf. Pl.* 155; *Mollinson v. Bowley*, MS. 1806; or in any one of the States in this Union, 3 *Cran.* 319; 9 *Cran.* 151; *Kirk v. Brown*, MS. 1818. But the Act of 1815, ch. 149, s. 4, authorizes the revival of an action at common law against an executor or administrator, to whom letters have not been granted here, and who "resides out of this State."