

40. And for a second plea the defendant says (here state the second plea.)

Pleas in Actions on Simple Contract.

41. That he never was indebted as alleged, or that he never promised as alleged.

The following forms with the commencement aforesaid shall be sufficient in actions on deeds or other contracts:

42. That the alleged deed is not his deed.

43. That at the time of the making of the alleged deed, the defendant was and still is within twenty-one years of age.

44. That at the time of the making of the alleged deed the defendant was and still is the wife of one W. T.

45. That the defendant was unlawfully imprisoned by the plaintiff, and others in collusion with him, until by duress of imprisonment he made the alleged deed.

46. That the alleged deed was procured by the fraud of the plaintiff.

47. That the plaintiff threatened the life of the defendant unless he would make the alleged deed; and that from fear of the threats he made the same.

48. That after the sealing and delivery of the alleged deed, it was, without the consent of the defendant, altered, and the words (insert them,) were inserted and substituted therein for the words (insert them.)

49. That the defendant delivered the alleged deed to one A. F., as an escrow, on condition that (state the condition,) then the said A. F. should deliver the alleged deed to the plaintiff as the deed of the defendant. And the plaintiff has not performed the condition.

50. That the alleged cause of action did not accrue within _____ years, (state the period of limitation applicable to the case,) before this suit.

Perkins v. Perkins' Ex'rs, 1 H & McH. 400. Gough v. Ridgely's Ex'rs, 3 H. & McH. 99. Lamott v. McLaughlin, 3 H & McH. 324. Stewardson v. White, 3 H. & McH. 455. Wootton's Ex'r v. Sprigg's Ex'r, 4 H. & McH. 352. Bullen