

Forms.

XLIX. 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.

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

LI. 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.

LII. 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.)

LIII. 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.

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

LV. That before this action be satisfied and discharged the plaintiff's claim by payment.

LVI. That the plaintiff at the commencement of this suit was, and still is indebted to the defendant in an amount equal to the plaintiff's claim, for (insert the cause of set-off as in a declaration; see form, ante,) which amount the defendant is willing to set-off against the plaintiff's claim.

LVII. That after the alleged claims accrued, and before suit, the plaintiff, by deed, released the defendant therefrom.

LVIII. That at the circuit for ——— county ——— term 1854, the plaintiff recovered judgment against the defendant for the sum of ——— dollars and ——— cents, and ——— dollars for costs; and that said judgment was rendered on the same cause of action mentioned in the plaintiff's declaration, and is still a subsisting judgment.

LIX. That he was discharged as an insolvent debtor by the circuit court for ——— county, (or court of Common Pleas for the city of Baltimore,) on the ——— day of ——— 1854, and that the alleged claim accrued before the filing of his petition.

LX. That he applied by petition as an insolvent debtor to the circuit court for ——— county (or