

To the Hon<sup>ble</sup> Thomas Norley Esq<sup>r</sup> Govern<sup>r</sup> of Maryland and Chief Justice  
of the Provinceall Court, & the rest of his Lordships Justices of the said  
Court The humble petition of Thomas Taylor Sheriff of Dorset County

Sheweth That yo<sup>r</sup> Petitioner by a writ out of the County Court of Dorset County  
aforesaid dated the first day of March One thousand six hundred seventy seven did arrest  
the body of one Anne Bryan at the suite of John Rawlings in an action of trespass upon the case  
upon which writ her returnes Lapi the County Court following holden the fourth of June One thousand  
six hundred seventy eight, and had there and there the body of the said Anne according to the  
bond of the said Writts. At which Court the said Anne appeared by John Haskewood her  
Attorney who desired imparlance and hee the Court, and it was granted by the Court & Records  
the next Court being the first of August One thousand six hundred seventy eight that  
pet declared against the debt for three hundred forty four pounds of Tobacco due by account and  
upon the motion of Thomas Pade for Attorney for the said Anne the Court ordered that yo<sup>r</sup> Petitioner being  
thereby as aforesaid should bring in the body of the said Anne, at the Court to be holden the third  
of September then next otherwise Judgment to be entered against the said Anne to pay  
the said Rawlings the said debt with costs of suite, and at the Court holden the said third day  
of September aforesaid the said Justices, did upon the motion of the said Pade for  
Counsel Judgement and cause the said to be Recorded against the said Thomas Taylor to pay  
the said John Rawlings three hundred forty four pounds of Tobacco forthwith with the same  
costs and the costs of suite  
Whereupon the said Thomas Taylor desired to appeal from the said Judgment to the Hon<sup>ble</sup> Court  
& putt in security according to the Stat in such cases, as by the Transcript of the Record of the said  
County Courts more fully appears

Now forasmuch as the aforesaid Proceedings and Judgment against yo<sup>r</sup> pet  
are altogether Arbitrary, Illegal and Erroneous  
First In that the said Commission executed upon yo<sup>r</sup> petition as sheweth to bring in the body of the said  
Anne the second Court after they had admitted of the appearance of her Attorney & granted him  
imparlance as aforesaid, When as yo<sup>r</sup> petitioner had not authority by the writ to detain  
her imprisonment longer then the first Court

Secondly - If your petitioner had failed to produce the body of the said Anne according to the returnes of  
the said Writts, the plaintiffe had his Remedy at Law against yo<sup>r</sup> petitioner, and the aforesaid  
Justices legally could but have amerced yo<sup>r</sup> petitioner unill hee had produced the said defend  
or had caused him to a signet Over the bailed bond to the Court

Thirdly - That there never was suite depending before the said Justices or any action conducted in the said  
Court by the said Rawlings or any person on his behalf against yo<sup>r</sup> petitioner for or concerning  
the matter for which the said Justices had given Judgment for your petitioner to pay the  
said Rawlings three hundred forty four pounds of Tobacco with the costs of suite of the said  
Rawlings of the said Anne Bryan

Therefore the aforesaid Judgment being Arbitrary, Illegal and  
Erroneous as aforesaid, yo<sup>r</sup> Petitioner humbly prays that the said  
Judgment may by your Hon<sup>ble</sup> Court be Reversed and Quashed, and that  
your petitioner may have his costs and charges in this behalf  
Unjustly sustained

And the said John Rawlings by Robert Ridgely his Attorney counsell and defendeth the force  
and injury which he and prayeth the Court to imparlance herunto unill next Provinceall Court  
and it is granted unto him the said day is given to the plaintiffe also

Now here at this day to wit the eleaventh day of October in the fourth  
year of yo<sup>r</sup> Dominion of Charles Lord Baltmore & Almon of Downy One thousand six hundred  
seventy nine came the said parties by their Attorneys aforesaid, and the said Thomas Taylor  
by his Attorney sayeth that in the Record and process aforesaid as also in the Rendering of  
Judgment aforesaid it is manifestly Erroneous in the Errors aforesaid by him in foreward  
aforesaid alladged and prayeth that the Judgment aforesaid be Reversed & annulled  
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