

and the ap^d Deft comes and defends the force and injury when he sh^d and
prays leave to impart hereunto until next Court and he hath it then the
same day is given the p^{ts} also

March 1799
Dⁿ Samuel Peale } Do^r David Seabell and B^d James Shuttleworth
Joseph Garnett } and returned copy
Agreed by M^{rs} Miller
Sally in said for p^{ts} } Nathl Dunningham

Dⁿ William Elmes } This being an action of Debt for the sum of one
Thousand two hundred thirty and eight pounds of
John Beech } Tobacco Comenced by the p^{ts} ag^t the Deft and

wherein there issued a copy of the Deed with the
writ in said action and wherein the Sheriff of Kent County to whom the
writ in the same action was directed makes return thereof to the Court
here on the Third Tuesday in March to wit the 15th day of the same
month Anno Domⁱ 1799 being the day of return Under sh^d copy
of the Deed served in time of me Simon Wilmer Sher^{ff}

Kent County } John Beech of Kent County Saylor otherwise called John
Boech was summoned to answer unto William Elmes
Maryland } of plea that he render him the full and just sum of

one thousand two hundred thirty and eight pounds of Tobacco of the value
of twelve pounds seven Shillings Sterling money which from him he
unjustly detains &c. And thereupon the ap^d p^{ts} by David Macbride

his atty saith that whereas the ap^d Deft the fifteenth day of May in
the year of our Lord Christ one thousand seven hundred & Nineteen at
St Pauls Parish in Kent County within the Jurisdiction of this Court by his
Certain Bill obligatory which he the said Deft sealed with his Seal

and as his deed delivered hereinto Court brought the date whereof
is the same day & year ap^d bound himself to pay or Cause to be paid
unto the ap^d p^{ts} the ap^d full and just sum of one Thousand two hundred

thirty and eight pounds of Tobacco of the ap^d value of twelve pounds seven
Shillings Sterling money on or before the tenth day of November next
ensuing the date of the said Bill Obligatory Nevertheless the ap^d Deft altho

often required by the Seventeenth day of November in the year ap^d at
the said County and Jurisdiction ap^d the ap^d full and just sum of one
Thousand two hundred thirty and eight pounds of Tobacco to the ap^d p^{ts}

he hath not rendered nor paid but that to him to render or pay without
hath refused still both refuse & unjustly detains to the Damage of the said
p^{ts} twenty four pounds fourteen Shillings Sterling money and thereupon he
brings Suit &c.

Macbride p^r Luce p^r Jos^{ph} Doe & Rindge
and now at this Court to wit the 15th day of March Anno Domⁱ 1799 comes