

waved the Judgem^t of this Hono^{ble} Bench to whome itt solely and properly belonged to take Cognizance of what is lawe or Equity And Crave a Jury to whome by the lawes of England and Maryland itt belongs to take Cognizance only of matters of fact, And Consequently the Jndent^r being proved or Confest must haue found for the def^t for were the legallity or equity of Bonds or Covenants when proved or Confest to be decided by a weake and Jgnorant Jury, The Complt vnder a favorable Correccōn humbly offers itt to the judicious consideracōn of this Courte what need would there be of Lawyers to dispute doubtfull Cases nor of learned judges to determine them but only to sitt as Cyphers to confirme ignorant and illegall verdicts And whereas there is noe other Wittnes pduced by the s^d Nicholls to prove his false suggestions but the foresaid Edward West whose misdemeano^{rs} towards the Complt when he was last in this Province is soe notorious that itt neede not be repeated though vpon his humble submission It was forgiven him by the Complt whose Serv^t he had been that he also liues in the s^d Nicholls his howse. And as the Complt is informed had a designe to marry his s^d daughter, In Consideracōn of all which p^rmisses with the illegallity of the Verdict wherein the Complt without ever being heard or any Wittnes in his behalfe Examined is asperst vpon Record with fraud and deceit, which he abhorrs, And is in his Conscience altogether Inno^{cent} haueing att that tyme as is well knowne neere twenty Servants to mayntayne And had noe need of soe vseles a Servant to increase his charge but only in charity to the s^d Child & her father who in 3 yeares tyme never challenged any such promise as he now suggests of the Complt^s nor att his last being in Maryland ever complayned to him of her employm^t or keepeing which was yett noe other then as one of his Ordinary Mayd serv^{ts} as doubtles he would haue done had there been truth in the oathe or allegacōn made in his absence to this hono^{ble} Court. To whome in parliam^t or Chancery by the lawes Customes & usages of Engld and this Province itt belongs to relieve the jnured ag^t. Surreptitious judgm^{ts} nothing being more Comōn in this nacōn then reversing of Judgm^{ts} vpon writts of Error in the equity or legallity of the proceedings which being Evident in the fores^d verdict he humbly prayes itt may be vacanted & the ord^r thereupon Reversed, whereby yo^r pet^r may haue his Reputacōn vindicated, The Servant or satisfaccōn for her tyme restored to the R^t Owno^r. The abused serv^{ts} and Apprentices of this Province righted, by all which if the s^d Nicholls or any other pson finde themselves aggrieved the Complt is ready to answe^r any Bill that shall be Exhibited legally ag^t him, Provided he haue notice & sufficient tyme given him for itt. And will putt in sufficient security to stand to

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