

to the Honorable the Senate Court
of the United States for the District
of New York in the second circuit

Humbly complaining sheweth unto the Honorable
Court - Your Orators Robert R. Livingston of
the County of Columbia and State of New York
-quire and Robert Fulton of the City of New York
in the same State - Gentlemen. That for a
series of years your orators have turned their
attention to the improvements of the art of na-
-vigation by steam and expended considerable
sums of money in perfecting the same, the
art if it might in any way be said to
have existed, at that time being so far un-
-known as that no principles or rules had
been, or have yet been, as your orators believe
laid down for carrying the same into effect
(except by your orators) tho' some abortive
attempts have been made to effect the object
with so little success, for a want of knowledge
(as your orators believe) of the rules and prin-
-ciples of the art, that when your orators
commenced their first boats the scheme was
very generally looked upon as visionary even
by the most scientific men. That in the year
one thousand eight hundred and two your orators
accidentally met in Paris and having after some

conferences on the subject satisfied themselves of
the practicability of effecting the object if the
rules and proportions on which its success must
ultimately depend could be accurately defined
That in order to discover these, and ascertain
them by experiments your orator united in build-
-ing a boat upon the Seine at a very great
expense and with no other intention than
to discover the principles on which the suc-
-cess of the operation must ultimately depend
That your orator was convinced from this experiment
that the object was attainable and accordingly
entered into an agreement to prosecute the same
on soon as they should both return to the United
States. and in the mean time that your orator
Robert Fulton should procure a steam engine for
that purpose in England. That your orator Robert
Fulton having devoted much time and thought to
this subject and aided by the above confer-
-ences and experiments invented and laid down
certain rules for the form and proportions for
boats that should be navigated by steam,
for the mode of setting the engine in such
boats, the manner of steering the same,
the form of the rudders, of the boat, the mode of

2
making the purchase upon the water. For the proportions between the power and the boat to produce a given effect and for various other particulars, in which rules and principles, as your orator believes, the art of navigating by steam consists, the right to the use and application of which rules, principles, improvements and proportions were in and by a Patent granted on the eleventh day of February ^{in the year} one thousand eight hundred and nine under the seal of the United States pursuant to the Act of Congress of the United States in such cases made and provided, bearing date on the same day and year last aforesaid granted to and vested in the said Robert Fulton his Representatives and assigns. An exemplification of which Patent ^{with the specifications therein referred to} is annexed to this Bill which your orator pray may be considered as a part of the same without being more particularly herein inserted or set forth on account of the expense and trouble that would attend the copying of the drawings referred to in the said patent. And your orator further sheweth this Honorable Court that being apprehensive that a more minute specification of the several

parts of the boats and machinery, ^{the} said Patent con-
-tained might, more fully describe the subject,
and tend to remove any doubt or question
that might arise in respect to the said Patent
and make it more difficult to cross the line
or to deprive your orators, ^{of} the benefits to
which they would be entitled under the said Patent
and which were thereby intended to be secured
to your orators the said Robert Fulton about
the ninth day of February in the year of our
Said one thousand eight th hundred and eleven ap-
-plied for and obtained from the United States
a second patent bearing date the same day
and your orators desires a copy of which patent
and the specifications accompanying the same
is annexed to this bill to which your orators
may leave to refer and pray for the reasons
above assigned that the same may be taken
as a part of this bill.

Your Orators further shew, unto this
Honorable Court that previous to taking ^{out} the
said Patents your orators did at their joint
expence build a boat to be navigated by
steam in union with wind, which boat was put
in operation near four years ago upon Hudson
river in the State of New York and was made

conformably to the rules afterwards specified and laid down by your orator Robert Fulton as the same are expressed in his said patent, from which time to this (except in those months in which the navigation of the said River between the Cities of New York and Albany was impeded by ice and excepting also occasional stoppages caused by different accidents) your orator has constantly and without interruption solely exercised the right of navigating Hudson River by steam, with boats built on their principles and in the manner described in those several patents and specifications above mentioned. And your orator further shew unto this Honorable Court, that in conformity to the original agreement between your orator, your orator Robert Fulton conveyed and assigned in due form of law one equal half of his right or interest in or under the said Patents to your orator Robert R. Livingston whereby your orator as well as by their original agreement and joint expenditures became equally interested in the said Patents and in all the rights and privileges accruing under the same and in the boats built in conformity to the said Patents. And your

orator further shew unto this Honorable Court
that John Stevens Esquire of Hoboken of the County
of Bergen in the State of New Jersey also
obtained a Patent from the United States for
certain improvements (as he alleges) in wrapping
the Machinery connected with the steam en-
gines for propelling of a boat and in the
formation of a boiler in manner as the same
is set forth in the exemplification of his said
patent and specification therein referred to
herewith annexed and which your orator
may may be taken as parts of this their
bill of complaint. And your orator further
shew that for avoiding all disputes and differ-
ences between the said John Stevens and your
orator they having long been in the habits
of friendship it was mutually agreed between
the said John Stevens and your orator that
they should reciprocally and exclusively make
use of each others improvements in certain
places mentioned in such a agreement which was
made and executed in writing on the first
day of December in the year of our Lord
one thousand eight hundred and nine and bears
date on the same day and year last afore-
said as by one part of the said agreement,

in the possession of your orators and ready to be produced as this Honorable Court shall direct, and to which your orators refer themselves may appear. And your orators do further shew, that one of the places in which by virtue of the said agreement with the said John Stevens your orators were exclusively entitled to avail themselves of the improvements of the said John Stevens was in the navigation of Hudsons River between New York and Albany. That in virtue of the said Patent of the said John Stevens and the said agreement of your orators with him the said John Stevens has built a boat, which now navigates the River Delaware and which is built on the model of your orators boat, with such alterations in particular parts in the machinery and boilers as conforms to the Patent of the said John Stevens, and of which boat and improvements or alterations the said John Stevens has been in the quiet and undisturbed possession and use of for about two years last past and is yet in the use and possession thereof.

And your orators further shew, unto

This Honorable Court. That thro' in virtue of the
said agreements your Orators are entitled to
the exclusive benefits of the patent of the said
John Stevens in the waters of the Hudson River
(with the exception of ferry boats) yet not prof-
-fessing the whole Patent rights your Orators
are advised that they cannot bring suit at Com-
-mon Law, in their own names for any intrusion
upon such rights and that they are compelled
to resort to a Court of Equity in order to
have the benefits of such agreement and to
enforce the same against any person or
persons that may make use in the waters
of the Hudson River, of the invention described
and referred to in the said Patent of the said
John Stevens. And in so much as your Orators
would otherwise be remediless in the Premises
they pray the aid of this Honorable Court to
maintain and establish their rights under the
said Patent of the said John Stevens and your Orators
said agreement with him against the De-
-fendants herein after named, who, or some
of them have intruded on the said rights as
herein after is mentioned.

And your Orators further shew unto
this Honorable Court that among a variety of others

improvements in the art of navigating by steam to the exclusive rights of which your orators are entitled by and under the above in part recited Patents to Robert Fulton the following may be particularly enumerated and specified that is to say.

First. The proportions of a boat designed to be moved by steam, that she may be so constructed as to meet with the least resistance in passing thro^o the water. She be sufficiently strong to bear the machinery, be fit for sailing and accommodated to the convenience of passengers. For the designations of which proportions your orators may leave to refer to the said Patents and specifications annexed to this their bill and to the drawings accompanying the same.

Secondly: the mode of operating in the water by wheels placed over the sides of the boat, and the proportions which such wheels their arms and buckets should bear to the boat and the power of the engine so as to obtain the utmost benefit of the power and the greatest velocity; for designations of these proportions and the manner of taking a passage on the waters by means of wheels con-

-formably to the Patent rights of your orators
granted to the said Robert Fulton your orators
may leave to refer to the said annexed Patents
and specifications and drawings. ↪

Thirdly. The manner of sitting the machinery
in a wood frame and placing the same on
keelsons that run a considerable way thro' the
boat, without which the boat would either leak
or bend ^{and} be greatly wrecked by the workings
and great force of the Engines. ↪

Fourthly. The manner of throwing the wheels
out of gear, so that one wheel may be stopped
while the other is in motion, in order to apply
the force of the engine all to one side of
the boat, and by that means to bring her
about, and to expedite and facilitate her move-
-ments from a direct course, and by means
of which both wheels may be suddenly stop-
-ped when it is required to arrest the pro-
-gress of the boat or to try the Engines
without a load. —

Fifthly in the invention of a guard
to each water wheel which is so constructed
as that while it protects the wheels from injury
serves as a support to the outer end of the axis

and affords room for fuel, wells for fish, steps and other conveniences for passengers and also in covering the wheels so as to prevent the ropes from being entangled, and the Deck from being kept wet by the spray from the wheels.

Sixthly; the manner of placing a steering wheel in the fore part of the boat in front of the chimney and near the works by which the helmsman can have a view ahead of the boat which he could not do if he was stationed in the after part of a vessel of such length and when the view from the after part is obstructed by sails rigging passengers chimney and works. And by being placed in this situation near the engine the helmsman is also enabled to communicate easily and speedily with the Engineer, or person who manages the engine and by this means to direct and govern with greater ease and certainly the movements of the boat.

Seventhly; adapting the rudder to this object by affixing thereto an iron standard from which ropes extend to the steering wheel.

Eighthly; assisting the operation of the wheels propelled by steam by the addition of sails of the boat and to adapt:

ing the masts and sails to a boat constructed as steam boats must necessarily be as to prevent their interference with the works and the danger of fire.

Kindly: The use of a shackle bar which descends from each end of the beam on the top of the Piston rod down each side of the Cylinder to a ^{hank} ~~channel~~ and tooth wheel in which the shackle bar is connected by a shackle pin. Your Orators state that this combination having been invented by your orator Robert Fulton in the year one thousand eight hundred and three is exhibited by a drawing thereof included in the said annexed specifications. As this invention is also claimed by the said John Stevens and the right to the same is granted to him by his said Patent. Your orators are only entitled to the exclusive use thereof on the waters of the Hudson River aforesaid either under the said assignment to your orators from the said John Stevens or under the said Patent to your orator the said Robert Fulton.

And your Orators further shew unto this Honorable Court that the said Patent to the said John Stevens Esquire issues to ^{him} the ex-

7

clusive right to use a boiler which consists of two distinct Cylinders with flues returned thro' them, and which according to his said Patent are to be suspended or hung by the ends so that their sides may be in contact having cast iron heads with a rim turning toward the inside of the boilers which skim fitting exactly with the sheet iron of the Cylinders with screws or rivets and the joints are made tight by a cement composed of with iron, which mode of making and suspending the boilers your orators believe to be a new and original invention of the said John Stevens and the same is now and has been for a long time in his use in his said steam boat, which navigates the Delaware River, and your orators well hopes that as the Public had received and continued to receive the highest benefits from the Inventions and improvements mentioned and specified in the said several Patents, and your orators and the said John Stevens had incurred very many and enormous expenses in making the same and in constructing steam boats upon the principles and with the improvements in the said Patents set forth and in a course of ex-

experiments which lasted many years to ascertain the true principles upon which boats to be propelled by steam should be constructed and in devising and carrying into effect the several improvements and inventions in the said Patents mentioned without which steam boats could not be used to any advantage and all of which conduce to their safety convenience and utility they, your orators would have remained in the full entire and unmolested possession of all the benefits to be derived from the said Inventions and improvements as secured or intended to be secured by the said Patents and agreements and the rather because the sole right of navigating by steam upon the waters of the State of New York for a number of years yet to come was vested in your orators the said Robert B. Livingston and Robert Fulton by the laws of the said State But now ^{it} is may it please this Honorable Court that James Van Dusen, Hugh Boyd, Sarah Townsends, John Townsends, Hamilton Boyd, Robert B. Henry, Robert Dunbar, Sumner, George Webster, Charles B. Webster, Jacob Ten Eyck, Tunis van Beekhem, Sells wine Junior, Horace Lockwood, Joseph Alexander, James Warren, Allen Brown, Abraham &

8
Lansing, Garrett J Lansing, Robert Gilchrist and
William, Anarvio all of the City of Albany

combining and confederating with divers per-
-sons to your orators unknown whose names
when discovered your orators pray may be hearing
inserted with apt words to charge them as
parties, how to injure and aggrieve your
orators in the premises and deprive them of
the benefits intended to be given or secured
to them by the said Patents and agreements pretend
and give out in speeches that your Orators
have no right to the benefits of the said
patents because as they sometimes pretend
and say that steam engines and the applica-
-tion of steam to the propelling or moving of boats
are not the inventions of your Orators or afi-
-liates of them but that the said Engines have
long been in use and were invented by other persons
and that the mode of applying the power of
steam to the moving of vessels was long since
discovered by other persons and not by your Orators
or either of them. and at other times they pre-
-tend and give out that the several matters
and things specified as inventions and improve-
-ments in the said several Patents, to your

orator the said Robert Fulton and the said
John Stevens respectively are no inventions
or improvements made or found out or first
used by them or either of them or by your
orator the said Robert B. Livingston but are
such as have been long known and in common
use and made and invented by others where
-as they the said Defendants and their
confederates well know and your orator ex-
-pressly charges the contrary to be true
and that the several matters and things
aforesaid and herein particularly stated are
as they are set forth and contained in the
said Patents real and useful inventions
and improvements to the exclusive benefits
whereof your orator are well entitled under
the constitution of the United States and the laws
thereof and the said several patents and agree-
-ments as well as the particular laws of the
State of New York which vest in your orator
the sole and only right to navigate by steam
or fire on the waters of ^{the State of} New York or within
its jurisdiction without regard to what form
of boats they may use the same being grant-
-ed or given to your orator for and in con-

consideration of ^{services} ~~amounts~~ to be ^{considered} ~~considered~~ ^{thereby}
^{by your orator} to the State) for a considerable time yet to come
 and at other times they the said Defendants and
 their confederates pretend and give out in speech
 - as that steam boats have been and may
 be brought to perfection and adapted to
 the Public and General use upon other prin-
 -ciples than those for the discovery and applica-
 -tion of which, your orator the said Robert Fulton
 obtained the said two first mentioned Patents,
 and that they the said Defendants and their
 confederates have constructed and are about to
 establish Steam boats to ply as passenger boats
 upon Hudson's River between the Cities of New
 -York and Albany, upon other principles than
 those discovered by your orator and without
 making use of any of the discoveries or improve-
 -ments contained or specified in the said
 Patents granted to your orator the said Robert
 Fulton or the said Patent granted as afore-
 -said to the said John Stevens; whereas the
 truth is and your orator do expressly charge
 that altho' the power of steam hath been long
 known and Steam Engines been applied to fire-
 Boats, yet that no boats moved by steam had
 been ever constructed, or made and brought into

generals use as your orator believe in such a manner, as to render such boats of public utility and fitted for the safe easy and expeditious transportation of goods and passengers with certainty and celerity until such time as your orator the said Robert Fulton had discovered and investigated and established the principles by which the application of steam to the propelling of Boats was to be governed and had ascertained the relative dimensions and construction of boats wheels and machinery necessary for that purpose as well as the method of uniting steam and wind, as moving powers in such a manner as that the one should not destroy or materially diminish the use of the other, and had invented and discovered and caused to be made and constructed such several improvements and inventions for adapting steam Engines to the purposes of navigation, for properly fixing such Engines in boats for conveniently steering and working such boats and for the fixing and covering the wheels and other machinery operated upon by the same steam Engines as are mentioned in the said several Patents to your said orator and herein ~~before~~ before enumerated and the truth also is that the

several matters and things for which the said several Parents have been granted to your said orator ^{Robert Fulton} and the said John Stevens are real and useful Inventions and Improvements for which the said several Parents were rightfully injured and to the benefit of which your orators are entitled as herein before is set forth. And your orators do further expressly charge that they have been in the actual exclusive and undisturbed use and enjoyments ^{upon the Hudson River as usual} of the said several Inventions and Improvements and the emoluments and profits there arising and to be made for near four years last past.

And your orators do further expressly charge that the said Defendants and their confederates have constructed boats to be navigated by steam upon Hudsons River, in imitation of and copying those which had been invented used and employed by your orators ~~and~~ John Stevens for that purpose according to the principles that had been discovered and laid down as aforesaid by your orator the said Robert Fulton and totally different in model and proportions from any that had been used upon the said River or elsewhere before your orators constructed and established their first Steam boat

upon the said rivers. And the said Defendants
and their confederates in further violations of
the said Patents have
applied or constructed for the purpose
of propelling the said boats built by them thro'
the waters the same form of boat as has
been invented used and first applied to that
purpose by your orators and the same kind
of water wheels and propelling boards and covers
for those wheels and the same kind and des-
-cription of sails and machinery as were used
by your orators and adapted for uniting the
powers of steam and wind and the same means
and manners of fixing the steam engine to the
boat, so as that the working of the said engine
may not injure or destroy the said boat and
also the same mode of steering the said
steam boats that had been invented as afore-
-said and specified in the said Patents gran-
-ted to your orators the said Robert Fulton
And also have constructed and made
and applied to the steam engine or en-
-gine which they have erected and set
up in the boat or boats or as aforesaid
built by them or some of them in order
to communicate to the power of such engine

from the Piston rod to the water wheels and
 check bar, so made fixed and connected
 as is described and specified in the said patent
 or as aforesaid granted to the said John Stevens
 and also to the said Robert Fulton. and in
 further violation of the said Patent to John
 Stevens have also constructed and fixed up
 such round sheet iron boilers so formed and
 suspended and with such iron heads cast with
 such rim and with such flanges turning in-
 ward and with such steam pipes as are also
 mentioned and specified in the said Patent.
 And your orator do further charge that the
 said Defendants and their confederates have
 in violation of the rights of your orator
 under the Patents above ^{mentioned} ~~related~~ granted as
 aforesaid, to your orator Robert Fulton and
 of the rights that your orator holds under John
 Stevens as aforesaid and notwithstanding the long
 and quiet possession of your orator and
 the said John Stevens, the said Defendants or some
 of them have made and devised or caused
 to be made and devised two steam boats
 in which they have copied and adopted the

several inventions and improvements herein
before enumerated and described, to which
your orators and the said John Stevens or
the legal assignees of your orators and the said
John Stevens have the Patent rights aforesaid
and the exclusive privilege of making and using
the same ^{inventions & improvements} and also others of your orators and
the said John Stevens the exclusive right to
the making and using of which are secured
to and vested in your orators by the Patents
above mentioned and the grant and assignments
aforesaid from the said John Stevens with only
slight and considerable alterations which are made
as your orators believe only, with a view to
elude the rights of your orators, and which al-
terations amount to no more as your orators

than to alter
believe merely the forms and proportions of the
said inventions of your orators ~~and your orators~~
and the said John Stevens if there be any alter-
ation and difference between the machinery
invented as aforesaid by your orators and the
said John Stevens and that made and adapted
as aforesaid by the said Defendants.

And your orators further shew unto
this Honorable Court that the said steam boats

so built by the Defendants as aforesaid are built as your Orator believes and as the Defendants publicly avow for the purpose of navigating and carrying passengers on the Hudson River between the Cities of New York and Albany and that ^{one} of the said steam boats of the Defendants has actually departed from the City of New York and proceeded as your Orator is informed ^{having twenty or more passengers on board as your Orator believes} and believes to the said City of Albany and the others of the said steam boats of the Defendants is nearly prepared and completed and is about also to ~~be~~ proceed from the City of New York to the said City of Albany.

And your Orator further shews unto the Honorable Court that your Orator the said Robert Fulton having as herein before is stated greatly improved the art of navigating by steam by laying down rules and principles which your Orator believes to have been unknown before and having reduced the same to practice and taken Patents therefor, your Orator humbly insists, that no person can legally practice on those rules and principles, whatever may be the form of their machinery without the consent of your Orator, in whom these improvements of the art of navigating by steam

is stated
And your orators expressly charge that the said
Defendants have conformed as nearly as possible
in the said steam boats, which they have built
and one whereof they are using as aforesaid
to the rules, principles, and proportions, descri-
bed in the said Patents, and the specifications,
drawings, and demonstrations therein annexed
And your orators have been informed and
well believe and hope to prove that the Defen-
dants or some or all of them or the workmen
under their direction have copies of the above
recited patents and specifications drawings and
demonstrations or some of them, and have used
the same in the building of the boats built
as aforesaid by the said Defendants and that
the said Defendants or their agents, engineers,
artificers, and workmen, ^{in some of them} have at different times
examined and measured the boats built by your
orators and the said John Stevens and the differ-
ent parts of the machinery therein for the
purpose of copying the same as they have done
in manner aforesaid and have in all the par-
ticulars aforesaid either exactly copied the steam
boats, engines, machines, inventions and improve-
ments of your orators and the said John Stevens

contained, specified and described in the said several
 Patents or if they have in any respects deviated
 or departed from the same, it has been only ~~coloured~~
 colourably as aforesaid and in some immaterial
 particulars and with a view to evade the
 said Patents and defraud your orators of the
 benefits and emoluments to which they were justly
 entitled by and under the Patents aforesaid,
 or some or one of them and the said Defen-
 -dants and their confederates or some of them
 threaten and either have established and used,
 or are about, by themselves their servants
 or agents unless prevented by the Honorable Court
 to establish and use the said Steam boats
 so constructed as aforesaid, upon the principles
 discovered as above mentioned with the said
 several improvements and inventions before
 enumerated and granted as aforesaid upon the
 waters of Hudson's River without any right, grant,
 license or authority from or under your orators
 to use the same and in direct violation of the
 said several patents as well ^{as} of the rights devised
 to your orators from and under the laws of the
 State of New York. All which aforesaid things done
 and breaches of the said several Patents and
 their confederates are contrary to Equity and good

conscience and tend to the grievous injury and dis-
-reputation of your Orators. In tender consideration
whereof and for as much as your Orators are
remedied ^{in the premises} by the strict rules of the Common Law
and can only be adequately ^{relieved} by the aid of a
Court of Equity, to the end therefore that the
said Defendants and their confederates when dis-
-covered, may answer fully and particularly
all the matters aforesaid & particularly
upon oath, whether your Orator the said Robert
Fulton and the said John Stevens did not obtain
such letters Patent under the Seal of the United
States as herein before ^{are} set forth and mentioned
or some other and what Patents for some and
what matters and things stated therein as inven-
-tions or improvements in steam boats or in
relations to the construction, proportions and modes
of steering and navigating the same and the
machinery and engines to be employed in propelling
and navigating the same and the manner of con-
-structing and fixing such machinery and engines or
some and what parts thereof and whether your
Orators have not constructed and used for some
and how long a time, steam boats upon
Hudsons River with such Engines and machinery
inventions and improvements or the said John
Stevens upon the Delaware River. And whether

124

the said Defendants or some of them have not constructed and used or threatened to construct and establish a steam boat or boats upon the principles in the said Patents some or one of them specified and with such machinery engines inventions and improvements as are specified in the said Patents some or one of them to be used upon Hudsons River or elsewhere in the State of New York and if they shall not admit that they have done so; then that they may particularly state whether they have not constructed or designed to use a boat or boats upon the principles laid down in the said Patents or what other principles; whether they have not constructed and used ~~used~~ in such boat or boats any and what machinery and engines generally similar to but in some respects varying from those for which the said Patents have been obtained and in what such variations consist, so that this Court may Judge whether such variations are not merely colorable and intended as evasions of the said Patents some or one of them. And that your Orators may by the aid and authority of this Honorable Court be quieted in the possession and enjoyment of the rights which they have

been in the exclusive use of under the said patent
for upwards of four years. And that the said Defendants
and every of them, their confederates agents and ser-
vants may be restrained from making constructing
or using any of the said improvements mentioned
in the said Patents within the State of New York
during the respective Terms for which the said Pa-
tents have been granted and from using or em-
ploying the steam boats by them so built as aforesaid
within the State of New York without suffi-
cient authority from your Orators and that the right
of your Orators to the said several Inventions
and improvements under the said Letters Patent
and the Laws of the State of New York may be
established and declared and your Orators further
and otherwise relieved according to Equity and
good conscience. May it please this Honorable
Court to grant to your Orators as writ or writs of
injunction under the seal of the said Court to the
said Defendants and every of them their confederates
agents Captains engineers Mariners and servants
to be directed commanding them and every of
them ~~from~~ absolutely to desist from using
within the said State of New York the said Steam
boats so by them built as aforesaid upon the
principles aforesaid and also from using all or any

of the inventions and improvements mentioned and
specified in and granted by the said Patents, and
any of them and which the said Defendants and
^{some} ~~their~~ confederates or some of them have copied
and imitated and used, or threatened to use
and are about using as aforesaid until such
time as the said Defendants have fully answer-
ed and this Honorable Court shall have
made other orders in the premises. And
may it also please this Honorable Court to
grant unto your Orator writs of Subpoena di-
rected to the said Defendants and their confe-
derates commanding them and every of them
by a certain day and under a certain pain
to be and appear in this Honorable Court
there, and there to answer the premises and
to abide such order and decree therein as
to your Honor shall seem meet, and agree-
able to Equity and good conscience

And your Orator shall ever pray etc.

Robert Fulton Golden & Graham

Sworn by Robt. Fulton
before me the 24th

Solr for Compl^{ts}
Rich. Harrison
of Counsel for
Compl^{ts}

1811-
B. Livingston