

Joseph Beakey

N<sup>o</sup>. 2231 Equity

In the Circuit Court  
For Frederick County

vs.

Wm. J. McQuinn  
and Others

Filed on the 11<sup>th</sup> January 1849.

To the Honorable, the Judges of Frederick County Court, sitting as a Court of Equity: Humbly-Complaining your Orator Joseph Beakey of Frederick County & State of Maryland a Citizen respectfully sheweth unto your Honors, that heretofore one Edward M. Quinn was seized & possessed in fee simple of a lot, and part of a lot of land lying and being in Frederick County, and State aforesaid the said lot being situated on the south side of the Main-Street, leading through the Town of Emmitsburg in said County, and known on the plat of said Town, as Lot n<sup>o</sup> 34 and said part of a lot, being situated on the south side of said Street, in said Town, and distinguished on the plat thereof, as Lot n<sup>o</sup> 36 That said Edward M. Quinn, being seized of said parcels of Land, did afterwards, on the fourteenth day of April eighteen hundred & thirty five, mortgage the same to one Cornelius McQuinn as will more fully appear by reference to said Deed of Mortgage herewith filed & marked N<sup>o</sup> 1 to which your Honors are respectfully referred, and which your Honors will please consider together with all other exhibits herewith filed as a part of this bill of Complaint - Your Orator further respectfully represents to your Honors - That subsequently to the execution of said Mortgage said lots & parcels of Land were sold at public sale by Henry Stoner then Sheriff of Frederick County aforesaid - and that one John Quinn became the purchaser of all the right Title, and Interest therein of said Edward M. Quinn as will more fully appear by reference to the deed of said Sheriff to said John Quinn, herewith filed & marked N<sup>o</sup> 2 your Orator further respectfully represents, That afterwards, that is to say, on the second-day of May eighteen hundred & forty two the said John Quinn, by an agreement in writing executed according to law, sold to William J. McQuinn, all the right title and Interest of the said John Quinn, of, in and to the said parcels of Land in said Deed from Henry Stoner to said John Quinn mentioned as will appear by reference to said agreement herewith filed, marked N<sup>o</sup> 3, and that the purchase money due by the said William J. McQuinn to said John Quinn for said lot of Land, in said agreement mentioned, has been fully paid to one Louis Lowe, who was duly appointed, administrator Debono non, with the will annexed of said John Quinn and being so was authorized in law to receive & receipt, for said purchase money, as will more fully appear by reference to exhibits N<sup>o</sup> 4 & 5. Your Orator further respectfully represents to your Honors That the said one Louis Lowe Adm<sup>r</sup> Debono non as aforesaid of said John Quinn, has fully contented, and paid to James