Exhibits hereunto filed, your Complainants pray, may be taken and considered by your Honors, as a part of this their Bill of Complaint. ~

That the said Richard Thomas, after making the Contract and agreement aforesaid, and receiving the Cash advances and articles set forth in said Exhibit "A," departed this life, on or about the 12th day of September 1870, and before he had threshed and prepared for market his said Crop of wheat and delivered the same to your Complainants, according to his Contract and agreement aforesaid. ~

That said Richard Thomas, before his death as aforesaid, made and published his last Will and Testament, and thereby constituted and appointed Archibald T Snouffer his Executor — And that letters testamentary on the personal Estate of said deceased, were duly granted to the said Archibald T Snouffer by the Orphan's Court of Frederick County — a certified Copy of which said letters testamentary, is herewith filed as Exhibit B. ~

And that the said Crop of wheat or the proceeds thereof, are now in the hands of the said Archebald Snouffer, as Executor of said Richard Thomas deceased.

And your Complainants are advised and charge that, by the agreement, your Complainants have acquired a valid and binding lien upon said Crop of wheat now in the hands of said Executor as aforesaid — And that your Complainants are entitled to the specific performance, by said Executor of said Contract and agreement so made by Richard Thomas in his lifetime, with your Complainants by their said Agent, as hereinbefore set forth. ~

And your Complainants are confident that, had the said Richard Thomas lived until his Crop of wheat aforesaid had been prepared and put in condition for market, he would have performed, in good faith, his Contract and agreement aforesaid, and would have delivered to your Complainants his said Crop, in payment and discharge of the said advances and charges set forth in said account. ~

But now so it is, that the said Archibald Snouffer Executor as aforesaid, although requested so to do, since the granting to him of letters testamentary aforesaid — has wholly refused to carry out and perform the said agreement and undertakings of said deceased, and to pay and discharge the aforesaid lien of your Complainants upon said Crop of wheat, and that your Complainants are remideless without the aid of this Honorable Court. ~

To the end therefore, that the said Archibald T. Snouffer Executor as aforesaid, may answer the premises, and that, by this Honorable Court it may be adjudged, ordered, and decreed, that the said Executor as aforesaid do specifically execute the said agreement of said deceased with your Complainants — And that the said Cash advances and charges may be, by your Honorable Court, decreed to be a lien upon said Crop of wheat in the hands of said Executor, and that said Executor may be, by your Honors, decreed to pay and discharge the aforesaid account out of the proceeds of said Crop of wheat — And that your Complainants may have such other and further relief as their Case demands. ~

May it please your Honors to grant unto your Complainants the writ of Subpoena, of the State of Maryland, to the said Archibald T Snouffer Executor of said Richard Thomas deceased, to be directed — Commanding him to be and appear before this Honorable Court, on a certain day to be therein specified, to answer the premises, and stand to abide by and perform such order directions and decree therein, as to your Honors may seem meet. ~

Geo R. Shellman
Complainants Solicitor

Filed Nov. 2nd 1870 ~