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after the death of said Winfield G. Horner on the 2d day of February 1889 as will appear from Exhibit No 5.

8th. And Plaintiffs further charge that the indebtedness of said Winfield G. Horner to them and to each of them accrued subsequently to the execution of Exhibit No 5. that they and each of them acted without any knowledge or notice of the execution of said Exhibit No 5. at the time of the contracting of the debts to them by said Horner and that their several debts accrued before said Exhibit No 5. was recorded.

9th. 9b. That the Citizens National Bank of Frederick, a body corporate hold a Judgment against the said Winfield G. Horner and Olivette J. Horner for a large sum of money viz between Five & Thousand dollars which is a lien upon the property herein mentioned, but which lien the said Bank is willing shall be paid out of the proceeds of sale of the land herein named, said lien to be paid in full out of said proceeds of sale before any other claims of other the creditors of the said Winfield G. Horner.

10th. That you the Plaintiffs are advised and so charge that the Deed from said Winfield G. Horner to the said Olivette J. Horner is invalid as against the said Plaintiffs and all other who were creditors of the said Winfield G. Horner under the same circumstances as the Plaintiffs: that the minor children of the said Winfield G. Horner have no interest in said property; that the Plaintiffs are entitled to have the real estate mentioned in Exhibit No 4. sold free and clear of all rights and claims on the part of said Olivette J. Horner and the proceeds of sale applied to the payment of the claims of Plaintiffs and of all others who may come in and are made parties to this suit and that after the payment of all liens upon said real property of all such creditors as shall show themselves entitled thereto that the surplus be paid over to the said Olivette J. Horner

11th And Plaintiffs further show that there is no other property in Maryland of the said Winfield G. Horner from which their claims can be made.

And Plaintiffs pray for the following relief:

1st. That the deed from Winfield G. Horner to Olivette G. Horner filed herewith as Exhibit No 5. may be decreed to be invalid as to the Plaintiffs and as to all the creditors of the said Winfield G. Horner who may come in to this case and show themselves to be creditors of the said Winfield G. Horner subsequent to the Execution of the Deed aforesaid and before the same was recorded and who had no notice of the Execution of Exhibit No. 5.

2nd. That the lands mentioned in Exhibits No. 4 and 5 may be sold free and clear of all right, title and claim of the said Olivette J. Horner and of the lien of the Citizens National Bank of Frederick reserving to said Bank against the proceeds of sale the lien of said Bank as fully as it exists against the land itself and that the proceeds of sale may be applied to the payment of the Plaintiffs and others the creditors of the said Winfield G. Horner who may show themselves entitled as herein mentioned.

3rd. That the Plaintiffs may have such further and other relief as their case may require.

And Plaintiffs pray for the following process: