

To The Honorable the Judges of Baltimore  
County Court sitting in Equity. =

The Bill of Complaint of John T. Gb.  
Worthington of Baltimore County, humbly  
shows that heretofore, to wit: on the Twenty  
first day of October in the year Eighteen  
Hundred and Forty Two, a certain Peter B.  
Hoffman of said County, being indebted unto  
your orator in the sum of Four Hundred and  
Fifty Three dollars, current money, and in-  
tending to secure the payment thereof unto  
your orator, did by his deed of that date,  
convey unto your orator, and his Executors,  
Administrators and assigns certain goods  
and chattels in said County, and particularly  
described in said deed; to which said deed  
there is a condition annexed, that it be  
void on payment by the said Peter B. Hoffman  
to your orator, of the aforesaid sum of  
money with interest thereon from the 21<sup>st</sup>  
of October 1842, or or before the 21<sup>st</sup> day of Oc-  
=tober in the year 1843 as by said mortgage  
deed herewith filed, <sup>marked Exhibit A which he says may be taken</sup> as part of this Bill,  
will more fully and at large appear:

And your orator charges that no part  
of the aforesaid sum of money, or the interest  
accruing

accessing thereon has been paid to him, al-  
-though the time limited for payment thereof,  
by the condition aforesaid, has passed and  
payment thereof has been duly demanded  
of the said Peter B. Hoffman. But the whole  
of said sum of money and interest as afo-  
-said remains due and owing to your ora-  
-tor.

To the End therefore that the said Peter  
B. Hoffman may answer the several matters  
and things herein before stated, as fully and  
particularly as if they were herein again re-  
peated and he was thereunto specially inter-  
rogated; and that the goods and chattels or  
so much thereof as may be necessary, may be  
sold for payment of your orator's claim with  
interest as aforesaid; and that your orator  
may have such further or other relief as  
his case may require.

May it please your Honorable Court  
to grant unto your orator the writ of Sub-  
poena against the said Peter B. Hoffman of  
Baltimore County, commanding him to  
appear in this Court, at some certain day to  
be therein named, to answer the premises,  
and abide by and perform such decree as may  
be passed therein and as in duty &

Edward Worthington  
Solicitor to Compliment

1845  
103

Bill 103

John D. H. Worthington

vs.

Peter B. Hoffman

"Boy 'C' - 246"

Mr. Bradford

File this bill and  
Exhibit A in your re-

cord Worthington  
solicitor for Complaint

of 24<sup>th</sup> May 1845.

Copied for Dept

The State of Maryland,

To

Peter D. Hoffman

Of Baltimore County, Greeting :

WE COMMAND AND ENJOIN YOU, that all excuses set aside, you be in your person before the Judges of Baltimore County Court, at the Court house in said County, on the first day of June next, to answer the complaint of

John J. Worthington

against you in the said court exhibited.

HEREOF fail not, as you will answer the contrary at your peril.

Witness, the Honorable STEVENSON ARCHER, Chief Judge of our said Court, the first day of May in the year of our Lord one thousand eight hundred and forty five

ISSUED the

16  
11

day of

May

184

five  
A. W. Bradford

✓

Equity

John J. Worthington

vs  
Peter B. Hoffman

Supra

Summons

M. Tracy,



Worthington

Co. 4 June 1845.

This Indenture, made this twenty first day of October in the year of our Lord one thousand eight hundred and forty two. Between Peter B. Hoffman of Baltimore County and State of Maryland of the one part and John T. H. Worthington of the same County and State aforesaid of the other part.

(Whereas the said Peter B. Hoffman owes and stands justly indebted to the said John T. H. Worthington, in the sum of four hundred and fifty three dollars Current Money and to secure the payment thereof, is willing to execute these presents. Now this Indenture witnesseth, that the said Peter B. Hoffman, for and in consideration of the promises and of the sum of five dollars, Current Money, to him in hand paid by the said John T. H. Worthington, at and before the sealing and delivery of these presents, the receipt whereof is hereby acknowledged, hath granted, bargained and sold, and by these presents doth Grant, bargain and sell unto the said John T. H. Worthington his Executors, administrators and assigns, all and singular, the goods, Chattels and Machinery for the manufacture of paper, hereinafter particularly described, mentioned and expressed; that is to say one large Copper dryer and framing with Cutters reels and setting to the same one large standing Iron Boiler and pipes and force pumps and the gears attached to the same. To have and to hold, all and singular the goods, Chattels, and Machinery above described, unto the said John T. H. Worthington his Executors administrators and assigns to his and their own use and behoof. Proved always and it is declared to be the true intent and meaning of these presents, that if the said Peter B. Hoffman do, and shall well and truly pay or cause to be paid, unto the said John T. H. Worthington, his Executors, administrators or assigns the full sum of four hundred and fifty three dollars Current Money with legal interest for the same, on or before the twenty first day of October — in the year eighteen hundred and forty

three, then and in such case these presents and every  
matter and thing herein contained, shall cease, determine,  
and be utterly <sup>null and void</sup> to all intents and purposes, any thing herein  
contained to the contrary notwithstanding; and the said  
Peter B Hoffman for himself his executors administrators  
shall and will well and truly, pay or cause to be paid  
unto the said John T H Worthington his executors adminis-  
trators or assigns, the said sum of four thousand and fifty three dollars  
current money, together with interest for the same, after  
the rate aforesaid, at such times and after such manner  
as herein before set forth and agreed for the payment there-  
of. And the said Peter B Hoffman his executors and  
administrators, all and singular the said good and chattels  
and machinery by these presents granted bargained and  
sold, and every part thereof, unto the said John T H  
Worthington his executors administrators and assigns, against  
him the said Peter B Hoffman his executors and adminis-  
trators, and against all and every other person and persons  
whatsoever, shall and will warrant and defend by these  
presents. In witness whereof, the said Peter B Hoffman  
hath hereunto set his hand and affixed his seal the  
day and year first above written

Signed Sealed and delivered  
in presence of  
the words "null and void" being  
first interlined -

J Hanson  
P Laurson

Peter B Hoffman

State of Maryland City of Baltimore

Be it remembered and it is hereby certified  
that on this twenty first - day of October one thousand  
eight hundred and forty two, before the subscribers  
two justices of the peace of the State of Maryland in  
also for the City of Baltimore aforesaid, personally  
appears Peter B. Hoffman, "he being satisfactorily proven  
by oral testimony, under oath, received by us"  
to be the person who is named and described as, and  
professing to be, a party to the foregoing deed or under-  
-ture, and doth acknowledge the said indentures or  
instrument of writing to be his act and deed.

In testimony whereof, we hereunto sub-  
-scribe our names on the day and year aforesaid.

J. Hanson Bell

P. Laurence



(Exhibit A)

Deed of Mortgage

John P. Hoffman  
To

John H. Worthington

Received to be recorded  
the 21<sup>st</sup> day of October  
1842 at 20 minutes  
past 4 o'clock P.M.

Same day recorded in Liber  
J. H. Noble folio 305 & one  
of the Records of Baltimore  
County & Examined

John H. Keck

21<sup>st</sup> May 1845

paid \$1,00

The answer of Peter B. Hoffman  
defendant to the Bill of  
Complaint of John T. B.  
Wilmington Complainant  
Exhibited & filed in "Bae."  
-twice Court & Court in Equity

The defendant answering says  
that he admits the facts stated  
in the Bill to be true and consents  
to a decree as agreed upon &  
and prays the same be decreed &  
dismissed.

Peter B. Hoffman  
Defendant

The answer to  
Peter B. Hoffman  
degr  
to the office of Compt  
of J. H. Williams, the  
Compt

Mrs. Hoffman  
Wm. H.

June 12<sup>th</sup> 1865

accepted without  
cost  
End W. H. Williams  
Solicitor for Compt

In the name of

(Final Decree in Chancery.)

John W. Washington } In Bactinnae County  
vs } Court in Equity  
Peter B. Hoffman }

June Term 1845

This cause being ready for hearing, and having been submitted without argument, and the Bill Exhibit answer

and all other proceedings therein having been read and considered—It is thereupon, this day of June in the year eighteen hundred and

12<sup>th</sup>

by authority of this Court,

ADJUDGED, ORDERED, and **DECREED**, That

Unless the defendant or some person for him shall make for the first day of October next pay unto the Complainant or bring into this Court to be paid him the money debt in the Bill Exhibit mentioned with the interest thereon and costs of suit, then the property in the said proceedings mentioned be sold; that

Edward Washington be and he is hereby appointed Trustee to make said sale, and that the course and manner of his proceedings shall be as follows: he shall first file with the Clerk of this Court, a Bond to the State of Maryland, executed by himself and a surety or sureties, to be approved by the Court in the penalty of One thousand Dollars, conditioned for the faithful performance of the trust reposed in him by this Decree, or to be reposed in him by any future Decree or Order in the premises; he shall then proceed to make said sale, having given at least three weeks notice by advertisement, inserted in such newspaper or newspapers as he shall think proper, of the time, place, manner, and terms of sale, which shall be

for Cash on the day of sale;

and as soon as convenient after such sale, the said Trustee shall return to this Court a full and particular account of his proceedings relative thereto; with an affidavit annexed of the truth thereof, and of the fairness of said sale; and on obtaining the Court's ratification of the sale, and on the payment of the whole purchase money, (and not before,) the said Trustee shall, by a good and sufficient deed, to be executed, acknowledged, and recorded according to law, convey to the purchaser, or purchasers, his, her or their the property and estate to him, her or them sold, free, clear and discharged from all claim of the parties hereto, Complainant and Defendant and those claiming by, from, or under them, or either of them: And the said Trustee shall bring into Court the money arising from said sale, to be distributed under the direction of this Court, after deducting the costs of this suit, and such commission to the said Trustee as this Court shall think proper to allow, in consideration of the skill, attention, and fidelity wherewith he shall appear to have discharged his trust.

J. B. DeGrand

Washington  
to  
Roffman  
Drece

12<sup>th</sup> June 1845

Copied for insertion

12<sup>th</sup> June 1845

Submitted by

W. H. G. G. G.

John J. H. Worthington

vs.

Peter B. Hoffman

In Baltimore County Court,  
sitting as a Court of Chancery.

June Term, 1845

**Whereas,** subpoena issued on a bill filed in  
this suit against the defendant *Peter B. Hoffman*

which has been duly returned served, and the said defendant having failed to  
*appear*

It is on the application of Complainants Solicitor, **ADJUDGED, ORDERED  
AND DECREED,** according to the act of Assembly in such case made and pro-  
vided, that the Complainant ought to be relieved in the premises, but because it is  
not known what relief *he is* entitled to, it is further ordered that a Commission  
issue to *William H. G. Dorsey Esq*  
for the taking of Testimony to support the allegations of said bill

*Jno. C. Deland*

103  
1845

Mr Worthington  
vs.  
Hoffman —

Interlocutory Decree

do. 5<sup>th</sup> June 1845.