County and partly in Anne Arundel County
called "Turners" and containing one hundred
& thirty four and a half acres, which
Mortgage, dated the first day of June Eighteen
hundred & forty seven & duly recorded in
Anne Arundel Calvert Counties, was intended
& conditioned to secure to them, your Orators,
the prompt payment of the debt aforesaid
& interest in four equal annual instal=
ments, viz, of four hundred & forty three
dollars and twenty one cents each, on the
first days of June in the years 1848,
1849, 1850, 1851 and 1852, as appears
by said Mortgage, a copy of which
will be exhibited as a part hereof when
in the progress of this suit it may become
necessary. They show that the first
instalment of four hundred & forty three
dollars & twenty one cents, fell due on the
first day of June Eighteen hundred and
forty eight and that a large portion
of the same, and the interest thereon due,
remain totally unpaid, the said Robert
B. Chew neglecting & omitting to pay the
same to your Orators: Wherefore they charge
that the said Mortgage is forfeited, and that they
are wrongfully & against Conscience & Equity
kept out of their money aforesaid: but
under consideration whereof they pray
that a decree may be passed for the
payment of their whole debt aforesaid
& interest and for a sale of said
Mortgaged property & premises for the
payment of the same, and to this end they
pray that the said Robert B. Chew may
be compelled to answer all & singular
the premises and charges of this Bill and
that subpoena may be issued directed to him
commanding him to be & appear here, & they pray
which being granted the writ prayed S. S. Lund for Complt