

Bill

Margaret Harry } No 2361 Equity in the Circuit Court for Fredk
 as } County as a Court of Equity filed 7th April 1857 in
 Simon Meredith & } the words and figures following to wit
 Mary Ann Meredith }

To the Honorable the Judges of Frederick County Court
 sitting as a Court of Equity

The Bill of Complaint of Margaret Harry of Frederick
 County, humbly shows that heretofore to wit on the 23rd day of January 1849 a
 certain Simon Meredith of said County, being indebted unto your oratrix for the
 sum of \$375 and intending to secure the payment thereof unto your oratrix did by
 his deed of that date convey unto your oratrix and her heirs certain real estate lying
 in said County and particularly described in said deed to which said deed there is
 a condition annexed that it be void in payment by the said Simon Meredith to
 your oratrix of the aforesaid sum of money as it became due with interest thereon
 according to the tenor and effect of the promissory notes evidencing said debt, as
 will appear by said deed filed herewith, which with all other exhibits your oratrix
 prays may be taken as part of this her bill of Complaint, which said exhibit is marked
 Exhibit No 1, and your oratrix files herewith the four promissory notes evidencing said
 debt, marked severally Exhibits No 2, No 3 & No 4

And your oratrix further shows, that Mary Ann Meredith wife of said
 Simon Meredith joined her husband for the execution of said deed

And your oratrix charges that no part of the aforesaid debt or the interest
 thereon has been paid to her although the time limited for the payment thereof
 by the condition aforesaid has passed and payment thereof has been duly demanded of
 the said Simon Meredith. But the whole of said debt and interest thereon remains
 due and owing to your oratrix as aforesaid. To the end therefore that the said
 Simon Meredith and Mary Ann Meredith may answer the several matters &
 things hereinbefore stated as fully as if they were specially interrogated thereto
 and that the premises aforesaid or so much thereof as may be necessary
 may be sold for payment of your oratrix' claim with interest as aforesaid, and
 that your oratrix may have such other or further relief as her case may require

May it please your Honors to grant to your oratrix the writ of subpoena against
 the said Simon Meredith & Mary Ann Meredith of Frederick County aforesaid,
 commanding them to appear in this Court at some certain day to be there named
 to answer the premises and abide by and perform such decree as may be passed
 therein and as in duty lie.

M B Lockett ploffs atty.

Ex No 1

Stamp duty paid 15¢ M B Tyler Clk

This indenture made this 23rd day of January in the year of our Lord
 1849 between Margaret Harry of Frederick County in the State of Maryland
 of the one part and Simon Meredith and Mary Ann Meredith his wife of
 the County and State aforesaid of the other part, witnesseth that the said Simon
 Meredith doth stand bound unto the said Margaret Harry in the following sums
 by his promissory notes duly executed, bearing date herewith one for the sum of
 95[¢] payable six months after date, one for the sum of 95[¢] payable nine
 months after date and the fourth note for 90[¢] payable 12 mos after date, all
 of said notes bearing interest from date. Now this indenture witnesseth that the
 said Simon Meredith and Mary Ann Meredith his wife as well for and in
 consideration of the aforesaid debt or sum of money therein received and for the