

thus life some time in the month of January or February in the year 1852 Interstate  
 indebted unto your Orator Samuel Clegg on his promissory Note or single bill dated the  
 22<sup>d</sup> day of April in the year 1848 for payment to your Orator or order of the sum of Thirty  
 seven Dollars & eighteen Cents, for value received, with Interest from date, and that the said  
 John D. Roney was also indebted in his life time to a certain Emory Edwards on a promissory  
 note dated the 6<sup>th</sup> day of July in the year 1850 for payment to said Emory Edwards or order -  
 the sum of Forty four Dollars, and fifteen Cents two days after date for value received and  
 the said Emory Edwards being indebted unto your Orator in the sum of Forty dollars  
 and Ninety Cents, afterwards to wit: On the thirteenth day of July in the year 1850  
 ordered and directed the said John D. Roney to pay to your Orator the said sum of Forty  
 dollars, and Ninety Cents which said Order the said John D. Roney on the same day accepted  
 by means of which said acceptance, the said John D. Roney became liable to pay to your  
 Orator the said sum of Forty dollars & Ninety Cents, according to the tenor and effect  
 of the said Order and of his acceptance thereof but to pay the said sum of money mentioned  
 in the said Order the said John D. Roney, in his life time hath hitherto altogether neg-  
 lected and refused, although often requested to pay the same by your Orator And your  
 Orator further shows That said John D. Roney was indebted also to your Orator in his life  
 time in the further sum of Eighteen Dollars, and Fifty Cents for sundry matters, and  
 things properly chargeable in account - That is to say for rent & hauling &c which  
 said Open account and promissory Note herein before first mentioned, and the said  
 Note of the said John D. Roney to said Emory Edwards together with the said Order of said  
 Emory Edwards upon said John D. Roney for the sum of Forty dollars, and Ninety Cents &  
 his said acceptance thereof, are herewith exhibited, marked respectively "Exhibit A,  
 Exhibit B Exhibit C & Exhibit D" and which your Orator prays may be taken & referred  
 to as part of this bill of Complaint And your Orator further shows That said  
 John D. Roney being so thereof indebted as aforesaid, unto your Orator and being so-  
 seized, and possessed of a certain lot or parcel of Land, with the appurtenances situated  
 in the Village of Snagsville in Frederick County, did on or about the 6<sup>th</sup> day of December  
 in the year 1851 make and execute a certain pretended deed of Conveyance to his wife  
 Margaret Roney, who is now the widow of the said John D. Roney, the said deed purpor-  
 ting to convey to the said Margaret Roney the said lot or parcel of Land with its appurten-  
 ances situated as aforesaid for the alleged or pretended consideration of One hundred  
 Dollars as recited in the said deed, and that said deed of Conveyance has been com-  
 mitted to records among the said Records of Frederick County, a certified Copy whereof  
 is herewith exhibited and marked Exhibit E and prayed to be taken and considered  
 as part of this bill of Complaint, your Orator charges that said deed of Conveyance  
 is utterly null and void, and that the same is connivance & fraudulent as against  
 your Orator and other creditors, and was made by the said John D. Roney to his said  
 wife, with the intent to hinder delay & defraud your Orator and other creditors  
 of their lawful debts and demands and that said deed is void as against your  
 Orator, and other creditors, and that the consideration in said deed is fictitious &  
 feigned, and if really paid is wholly inadequate to the actual value of said  
 property, And your Orator further states - That shortly after the said John D. Roney  
 executed the aforesaid Conveyance to said Margaret Roney his wife, he departed this  
 life, leaving the said Margaret Roney his widow and John Roney Joseph Roney  
 Alice Roney and Catharine Roney his only children and heirs at law all of said  
 Children being now infants under the age of Twenty One years & reside in Frederick  
 County Maryland That the said John D. Roney at the time of his death  
 owned but a very small personal Estate the same being of very little value