consideration whereof and for that your Orator is remediless in the premises by the strict rules of the common law & relievable only in a Court of Equity where matters of this nature are properly cognizable, & the end therefore that the said John W. Jackson & Amanda E. his wife, Joel T Jackson & Emily his wife, Michael Roberts & Mary Catharine his wife, Frederick Wiles & Sarah A. his wife, Enos A. Jackson & Rebecca his wife, Warren T. Jackson & Josephine his wife, Martha E. Jackson, Franklin Stottlemire & Maria Jane his wife & George W Pole may answer all & singular the charges aforesaid & that said real estate may be decreed to be sold by a trustee to be appointed by your Honor for the purpose, unless said defendants shall on or before a short day to be named pay said mortgage debts with the interest due thereon and that your Orator may have all such other & further relief in the premises that the nature of the case may require & to your Honor shall seem meet. May it please your Honor to grant unto your Orator an order of publication giving to Joel T Jackson & Emily Jackson his wife, Enos A. Jackson & Rebecca Jackson his wife, who are non residents as before stated, notice of the substance & object of this bill & warning them to appear in this Court in person or by solicitor on or before a certain day to answer the premises & show cause, if any they have, why a decree ought not to pass as prayed & may it please your Honor to grant a writ of Subpoena to be directed to the said John W. Jackson & Amanda E Jackson his wife, Michael Roberts & Mary A. Roberts his wife, Frederick Wiles and Sarah A. Wiles his wife Warren T. Jackson & Josephine Jackson his wife, Martha E. Jackson, Franklin Stottlemire and Maria Jane Stottlemire his wife of Frederick County, and to George W Pole of Washington County, thereby commanding them & each of them to be & appear before your Honor on a certain day thereon to be named to answer all & singular the premises and to stand to, abide and perform such order and decree therein as to your Honor shall seem meet and your Orator will ever pray &c.

Grayson Eichelberger
Sol^r for Complainant.

Exhibit No 1

164 f 67. One day after date I promise to pay Joel T. Jackson and Christian H. Jackson or order the just and full sum of one hundred and sixty four dollars and Eighty seven and a half Cents for value received with interest from date for value received. As Witness my hand and seal this 13th day of August 1849.

William Jackson (Seal)

Endorsed. Aug 10th 1857 Rec^d my part of the within note in full,
Joel T Jackson

John W. Jackson.

Exhibit No 2

At the request of Joel T. Jackson the following mortgage was recorded Aug 29th 1849. Rec^d ten cents for Stamp duty.
Wm T. Tyler Clerk.

Exhibit No 3

This Indenture made this 13th day of August in the year of our Lord 1849 between William Jackson of Frederick County & State of Maryland of the one part & Joel T Jackson & Christian H. Jackson of Frederick County & State aforesaid of the other part. Whereas the said William Jackson by his bond or obligation duly executed bearing date on the 13th day of August 1849 stands bound unto the said Joel T. Jackson & Christian H. Jackson their Executors, administrators and assigns in the sum of one hundred and sixty four dollars and 87½ Cents Current money as by the said bond & conditions may more fully appear. Now this indenture witnesseth that the said William Jackson in consideration of the said debt or sum of one hundred & sixty four dollars and 87½ Cents owing to the said Joel T. Jackson & Christian H Jackson as aforesaid and for the better securing the payment thereof with interest to the said Joel T Jackson and Christian H Jackson their Executors, administrators or assigns according to the condition of the said bond and also in consideration of the further sum of five dollars Current money to him the said William Jackson by the said Joel T. Jackson & Christian H. Jackson in hand paid at and before the sealing & delivery of these presents the receipt whereof is hereby acknowledged