

Among others were the following proceedings to wit  
 Michael P Gallagher of the City of Boston that heretofore to wit  
 On the 2<sup>nd</sup> day of February 1857 Case  
 James A Gallagher & others vs the said Michael P Gallagher in Court  
 here sitting by Jos M Palmer Solicitor & filed in Court here the  
 following Bill & Exhibits

Bill

To the Honorable Madam Nelson Judge of the Circuit Court  
 for Frederick County sitting as a Court of Equity  
 Humbly Complaining sheweth unto your Honor your Orator  
 Michael P Gallagher of the City of Boston in the State of  
 Massachusetts that on the first day of October 1855 James A  
 Gallagher of Frederick County and State of Maryland was  
 justly and bona fide indebted to him in the full and  
 just sum of three thousand and eighty dollars current money  
 your orator further sheweth unto your Honor that the said  
 James A Gallagher in order to secure the payment of the  
 said sum of money so due and owing to your Orator with  
 the interest thereon in and by a deed of Mortgage bearing  
 date the day and year aforesaid and also in consideration  
 of the sum of five dollars to him in hand paid by your  
 Orator & ad currency unto your Orator certain real estate  
 situate in Frederick Town in said Mortgage Deed particularly  
 specified and described a true and Certified Copy of said  
 Mortgage Deed is here exhibited as a part of this Bill marked  
 A which together with all other Exhibits your Orator prays  
 may be considered as a part of this Bill as if inserted but  
 length your Orator further sheweth unto your Honor that  
 the said James A Gallagher has not paid said sum of  
 money and the interest thereon to your Orator as agreed  
 and stipulated to do on his part notwithstanding your  
 Orator has heretofore frequently demanded and requested  
 him to pay said sum of money and interest thereon that  
 said sum of three thousand and eighty dollars and interest  
 thereon and every part thereof is now justly and bona fide  
 due and owing to your Orator no part thereof having been  
 paid your Orator further sheweth unto your Honor that on  
 the 7<sup>th</sup> day of March 1852 Richard J Harbottle use of the  
 Frederick Town Savings Institution obtained a Judgment  
 against the said James A Gallagher before the Circuit Court  
 for Frederick County a true and Certified Copy of said  
 Judgment is herewith exhibited as a part of this  
 Bill which shows the true amount due on said Judg-  
 ment marked B that on the 20<sup>th</sup> day of Nov 1852 Thomas  
 Meredith and Joseph H Spencer before the said  
 Circuit Court obtained a Judgment against the said  
 James A Gallagher a true and Certified Copy of said  
 Judgment which shows the true amount due thereon