

Created by said will & that it will be necessary to appoint a new trustee in the place & stead of said Felix B. Loney to carry out said trust that said deed has just been found & is herewith filed as Exhibit No 7 & contains a description of said land but not having been recorded is insufficient to pass the title to said Real Estate. In underformed relation whereof & for that your orator is remedied in the premises by the strict rules of the Common Law and applicable only in a Court of Equity where matters of this nature are properly cognizable. Do they and therefore that the said Felix B. Loney, Harriet Loney widow of Joseph Loney, dec'd Thomas Doyle Mary Doyle his wife Harriet Loney, Dorothea Loney, Henrietta Loney, Joseph Loney & Helen Loney may answer the matter & things hereinbefore stated & charged as fully as if the same were here again repeated & thereunto particularly interrogated may it please your honor to order & decree that on payment by your orator to said Felix B. Loney or to a trustee to be appointed in his place of said sum of one thousand dollars the said Felix B. Loney as trustee executor aforesaid or a trustee to be by your Honor appointed in his stead shall by a good and valid deed of conveyance to be executed & acknowledged agreeably to law convey to your orator the said real estate to & aforesaid purchase by your orator and in the event of the refusal of said Felix B. Loney to execute said trust to and may it please your Honor to grant unto your orator all such other and further relief in the premises as the nature of the case may require & to your Honor shall seem meet and may it please your honor to grant unto your orator the state of Maryland writ of Subpoena to be directed to the said Felix B. Loney of Frederick County Harriet Loney widow of Joseph Loney Thomas Doyle & Mary Doyle his wife Harriet Loney Dorothea Loney Henrietta Loney & Joseph Loney of Baltimore City thereby commanding them and each of them to be and appear before your Honor in this Court on a day therein to be named to answer the premises & to stand to abide & perform such order & decree as may be passed therein and your orator will ever pray & and may it further please your honor to grant unto your orator for order of publication giving notice to the said Helen Loney who is a non resident as before stated of the substance & object of this bill and warning her to appear in this Court in person or by solicitor for or before a day therein to be named to answer the premises & show cause if any she have why a decree shall not pass as prayed and your orator will ever pray

L. Reichelberger Solicitor  
for Complainant

Maryland Sept  
Real The State of Maryland to Harriet Loney widow of Joseph