

for Frederick County sitting as a County of Equity.

The body of Complaint of the Reformed Circuit Benevolent Society of the Methodist Protestant Church respectfully shows that a certain Peter Boyer in his lifetime to wit on the third day of April in the year 1860 was by his single bill bearing date the day & year aforesaid & payable twelve months after date with interest from date indebted to John W. Charlton & P. Light Wilson trustees in No 2799 Equity in the sum of Seventy five hundred dollars and to secure the payment thereof the said Peter Boyer and Mary Boyer his wife on the day & year aforesaid by their deed duly executed acknowledged and recorded conveyed to said John W. Charlton & P. Light Wilson part of a tract of land called "Quaker's Folly" part of a tract called "Struggle" part of a tract called "Anchor & Hope" & part of "The Rising" or "Anchor & Hope" containing in the aggregate two hundred and twenty acres and twenty two fitches of land to which deed there was annexed a proviso that if the said Peter Boyer should pay to said John W. Charlton & P. Light Wilson said sum of Seventy five hundred dollars & the interest thereon or or before the third day of April 1861 according to the terms of said single bill, then the said deed of Mortgage should be void, all of which with a description of the land thereby conveyed well fully and at large appear by said single bill herewith filed as exhibit No 1 and by said deed of Mortgage herewith filed as exhibit No 2. Which with all the exhibits your orator prays may be taken and considered as a part of this bill of Complaint as if they inserted in words and figures your orator further states that said Peter Boyer in his lifetime paid by monthly interest on said single bill up to the 3^d day of October in the year 1860 & some time in the month of January in the year 1861 departed this life leaving the whole of the principal sum of Seventy five hundred dollars in said single bill specified with the interest thereon from said 3^d day of October unpaid, that the said Peter Boyer departed this life leaving the said Mary Boyer his widow and the following children namely Children as his only heirs as Lavinia G. Boyer John G. Boyer Mary Boyer Henry Boyer Mary G. Boyer who has intermarried with a certain Daniel Gould and Cordelia A. Thomas that the said John W. Charlton & P. Light Wilson on the 29th day of April in the year 1861 assigned said single bill & Mortgage to your orator for a full and valuable consideration as well fully appear by said single bill & Mortgage deed with said assignments thereon indorsed. Your orator further states that no part or portion of said sum of Seventy five hundred dollars or of the interest thereon from the third day of April 1860 has been paid but that