

large appear, reference being made to the said notes herewith exhibited marked Exhibit No. 1, Exhibit No. 2, Exhibit No. 3, Exhibit No. 4, Also to a Copy of said deed herewith exhibited marked Exhibit No. 5, which with all other Exhibits hereinafter produced, your Complainant prays may be taken and considered as part of this his Bill of Complaint. —

Your Complainant further states that the said Isaac Wright and Mary Wright his wife, by deed dated on the seventh day of December Eighteen hundred and forty eight conveyed the said lands above described to Abraham Wolfe, as will appear by a Copy of the said deed herewith exhibited marked Exhibit No. 6 —

Your Complainant further states that the said Abraham Wolfe and Sarah Wolfe his wife on the eleventh day of February in the year Eighteen hundred and fifty four — conveyed a portion of said lands above described to John Agnew and Raphael Barbo as will appear by a Copy of said deed herewith exhibited, marked Exhibit No. 7

Your Complainant further states that Noah Phillips — by his deed of release dated on the 25<sup>th</sup> day of February Eighteen hundred and fifty four released to said Agnew and Raphael Barbo, that portion of said Mortgaged premises — conveyed to them as above stated by the said Abraham Wolfe and Sarah Wolfe his wife — as will appear by a copy of said release herewith exhibited marked Exhibit No. 8 —

Your Complainant further charges that he has been informed and so believes that Isaac C. Pearson Esq. claims title to the said Mortgaged Premises, either as purchaser from said Isaac Wright or Abraham Wolfe and is now in possession thereof, but has received no deed for the same —

Your Complainant further charges that sundry payments on said Mortgage debt have been made from time to time, and that the debt due and owing is seven hundred and one dollars and seventeen Cents as will appear by the statement herewith exhibited marked Exhibit No. 9 — which said seven hundred and one dollars and seventeen cents, with interest the fourth day of July Eighteen hundred and fifty four is still due, owing and unpaid — Not having been paid to the said Noah Phillips — his lifetime, or to your Complainant as his Executor since his death — Your Complainant states that the said Noah Phillips is dead — having first made his will, and appointed your Complainant Executor thereof — who has entered upon the duties of his office, having filed his duly approved bond as will appear by a Copy of letters of Exemplification herewith exhibited marked Exhibit No. 10 —

Your Complainant further states that the said Abraham Wolfe died in the month of October in the year Eighteen hundred and sixty three, leaving the following children his heirs at law, to whom the fee of the Equity of redemption descended — All of whom are adults to wit Charles Wolfe who lives in the State of Ohio — Rebecca — married to John Shrank, and who lives in the State of Ohio, Elizabeth, who married John Switzer — and who survived her husband, and now lives in Carroll County Maryland; Mary — who married Isaac Wright, and who now resides in Carroll County Maryland — Susan — who married Ephraim Repp, Joseph Wolfe, Daniel Wolfe, John M Wolfe and Margaret Wolfe, all of whom reside in Carroll County, State of Maryland and Samuel Wolfe who resides in Frederick County, State of Maryland. —

To the end therefore that the defendants hereafter named may answer the several matters and things hereinbefore stated, and that the said Mortgage premises or so much thereof as may be necessary, may be sold to pay your Complainant's aforesaid Claim with interest. That a Trustee may be appointed to make such sale — And that your Complainant may have all such other and further relief in the premises as the nature and Equity of his case

Exhibit A

Exhibit B

Exhibit C

Exhibit D