

F. Kramer, now married to Elizabeth B. Kramer, Philip B. Kramer, James L. Kramer, Franklin B. Kramer, Mary C. Kramer, all of full age, and Lewis M. Kramer, Alice C. Kramer and Virginia Kramer infants under the age of twenty one years. ~

The Bill further states, that Frederick W. Kramer being indebted to John C. Motter on five notes of Five hundred each, and one note of three hundred dollars executed in conjunction with his wife Margaret Kramer - a Mortgage of the Lands therefor conveyed him by John C. Motter to said John C. Motter who by Equitable assignment in writing not under seal, assigned two thousand dollars of said Mortgage to Jacob Fox, and three hundred dollars thereof to Bradley J. Johnson. That said Jacob Fox Equitably assigned his interest in said Mortgage to Simon C. Simmons, and that the Frederick County Bank assignee of Bradley J. Johnson by Wm. Ross assigned the said claim of three hundred dollars to Simon C. Simmons - And that all of the debt intended to be secured by said Mortgage has been satisfied, except the claim of three hundred dollars with such interest as may be due thereon, which is now owned by said Simon C. Simmons, as Equitably Assigned - That the said Mortgage still remains unsatisfied on the records of the Court. ~

The Bill further states that the whole of the purchase money due on the purchase from Catharine Davis has been paid, either to her in her life time, or since her death to James L. Davis her Executor - And that there is no balance on record, of the loan reserved by the deed. ~

The Bill further states that Frederick W. Kramer being indebted to the Franklin Savings Bank on the sum of Forty five hundred dollars, to secure the same, in conjunction with his wife Margaret Kramer, Mortgage, his estate therein described, as also the land conveyed by said Catharine Davis to said Frederick W. Kramer, to said Franklin Savings Bank, which debt is still due and unpaid.

The Bill further states that the personal Estate of said Frederick W. Kramer, is wholly insufficient for the payment of his debts, and that a sale of the greater part, if not the whole of his real estate is necessary for the payment of his debts.

The Bill further states, that John C. Motter, and Bradley J. Johnson are now residents of the State of Maryland. ~

It is thereupon this 13th day of February in the year Eighteen hundred and sixty seven, Ordered that the Complainant by causing a Copy of this Order to be inserted in some newspaper published in Frederick once in each of four successive weeks before the twenty third day of March 1867. give notice to the said absent defendants of the object and substance of this bill; and warn them to appear in this Court in person or by solicitor, on or before the Twenty fourth day of June next to answer the premises and show cause if any they have why a decree ought not to pass as prayed. ~

Filed February 13th 1867. ~

Jos. W. Hart, Clerk of the Circuit Court for Frederick County

Answer of Franklin Savings Bank

The answer of the Franklin Savings Bank to the Bill of Complaint of the Frederick Iron Savings Institution filed against it and others in the Circuit Court for Frederick County as a Court of Equity. ~

These defendants for answer to said Bill of Complaint, answers and say that they admit to be true as charged in the said Bill of Complaint. ~ That Frederick W. Kramer in his life time, by his promissory note dated January

Answer of Jacob Fox

Answer of S. C. Simmons

Answer of Margaret Kramer