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No. 3106 Equity

To the Honorable ——— Nelson Judge of the Circuit Court for Frederick County Sitting as a Court of Equity —

The Bill of Complaint of John Gifford and Henry Lorentz Trading under the name and style of firm of Gifford and Lorentz of the State of Maryland and Frederick County, Humbly shewing unto your Honor; That a certain Stephen Joy in his time was indebted unto your Orators in two Judgments obtained against him for their use in the Circuit Court for Frederick County, to wit: One Judgment rendered on the 26th day of January Eighteen hundred and fifty, for eighty one dollars, with interest from its date, and Eighty three and a third cents. The other Judgment rendered on the 28th day of February Eighteen hundred and Fifty, for Eighty Nine dollars fifty six cents, with interest from its date, and Eighty three and one third cents. A certified Copy of which said Judgments is herewith Exhibited as a part of this their Bill of Complaint, Marked A No. 1 and which Your Orators pray may be taken and considered as a part of this their Bill of Complaint, and as though they were literally recited and incorporated therein. Yours — further charge that the said Stephen Joy, indebted as aforesaid to Your Orators, departed this life some two years past, intestate, and without any personal Estate upon which an Administration could be had, and that no Administration has been granted by the Orphan's Court upon his personal estate — There being none in fact upon which an administration could be granted.

Your Orators further Charge, that at the time of the death of the said Stephen Joy he was possessed of the following small amount of Real Estate situate lying and being in Frederick County aforesaid, to wit. A parcel of land of about ten acres of land & other premises which he the said Stephen Joy bought of a certain Thomas R. Johnson, by deed dated on the 13th day of April 1859 & Recorded in Liber A.S. No. 9 Folio 197 &c. one of the Land Records of Frederick County aforesaid, and also of a small lot of Ground purchased of Frederick Biser & Hepsey Biser his wife, by deed dated the 4th day of April 1842, and Recorded in Liber A.S. No. 16 Folio 612 &c one of the Land Records of Frederick County aforesaid, as will appear by the said deeds recorded as aforesaid, and which said deeds will be exhibited if necessary hereafter as a part of this your Orators Bill of Complaint. —

Your Orators further charge that the said Stephen Joy died without any personal Estate upon which an administration could be had, and that his real estate is properly chargeable with the payment of their claim against him, and the claims of all other Creditors who will come in and contribute to the expenses of this suit. — Your Orators further charge that said Stephen Joy at the time of his death, left the following heirs at Law to whom his real estate descended, chargeable with the payment of his debts, to wit: Elizabeth Joy residing in Frederick County, and the following Children of Sarah Joy who was twice married, and died in the lifetime of her father the said Stephen Joy. to wit: Mary Gover & Wilhemina Gover, the children of her first marriage, and Charles Johnson who resides in the City of Baltimore, Edward Johnson who also resides in the City of Baltimore, Robert Johnson residing in the City of Washington, and out of the State of Maryland. Baker Johnson residing at Ellicotts Mills in Baltimore County, John H. Johnson residing out of the State of Maryland, in the State of Ohio, and Catherine Johnson now intermarried with ~~with~~ John Kinney and both residing in Frederick County, All of whom were her children by her second marriage. — That Mary Gover one of the daughters by the first marriage, married a man by the name of John Harvey who has abandoned her and gone into some foreign parts out of the State of Maryland as known to Your Orators; and that Mary Harvey resides at Ellicotts Mills in Baltimore County That Wilhemina Gover the other daughter by her first marriage, married Robert Redman and they both reside at Ellicotts Mills