

The Bill of Complaint of Emily Johnson of Frederick County State of Maryland Sheweth - That a certain John H. Nelson late of Frederick County deceased on the thirty third of October in the year Eighteen hundred and sixty seven in his life time being indebted unto your complainant in the sum of Four thousand dollars, with interest from the date thereof, the interest payable semi Annually in each and every year to secure the payment of the same with the interest thereon according to the tenor and effect thereof, did in conjunction with his wife Jannette M. Nelson by deed convey all those parts of tracts of Land situate in Frederick County State of Maryland called and known as part of "The Resurvey on Leeches Level" and part of Keefe's Prospect, containing one hundred and thirteen Acres two roods and seven perches of Land except such parts thereof as were theretofore sold and conveyed by said John H. Nelson, also all that part of a tract of Land situate in said County and State being part of a tract of Land called the "Resurvey on Leeches Level" containing one hundred and forty acres two roods and thirty perches of Land particularly described therein therein - Which Mortgage was subject to a condition to be void provided that said John H. Nelson shall pay to the said Emily Johnson the sum of four thousand dollars two years from the date of said Mortgage, with interest from the date, the interest to be paid semi-annually, all of which matters will more fully appear by reference to a Copy of said Mortgage duly certified herewith exhibited, Marked Exhibit No 1, and to a copy of the deed from W. H. Adams Esq. to John H. Nelson herewith exhibited Marked Exhibit No 2 to a copy of the deed from John H. Nelson and Jannette M. Nelson his wife to Michael H. Haller herewith Exhibited Marked Exhibit No 3 and a Copy of the Deed from Fannie E. Adams to said John H. Nelson herewith Exhibited Marked Exhibit No 4, which said Exhibits with all other Exhibits herein after produced, your complainant prays may be taken as part of this her Bill of Complaint.

Your complainant further states that by a decree passed in No 3126 Equity Circuit Court for Frederick County on the 30<sup>th</sup> day of October in the year 1863, the said John H. Nelson was duly appointed Trustee for Jannette M. Nelson, Fannie E. Adams and Eleanor M. Cooper, and was decreed to give bond in the penalty of Eighteen thousand dollars with two or more securities to be approved by the Court of the Clerk thereof, conditioned for the faithful discharge of his trust, and that said John H. Nelson, did on the thirty first day of October in the year Eighteen hundred and sixty three, execute his bond as Trustee in the penalty of Eighteen thousand dollars, in which bond Thomas R. Garboe and Michael H. Fout were his Securities and which bond was duly approved, all of which matters will more fully and at large appear by a Copy of said decree, and a Copy of said bond herewith exhibited Marked Exhibit No. 5 and Exhibits No 6.

Your complainant further states that the said John H. Nelson to indemnify and save harmless the said Thomas R. Garboe and Michael H. Fout from all loss cost charges