

George W. Poole
or
John H. Albaugh
and Susanna Albaugh
his wife and others

No 3468 Equity ~

In the Circuit Court for Frederick County, sitting as a Court of Equity ~

Be it remembered that heretofore, to wit. On the 5th day of April, in the year of our Lord One thousand Eight Hundred and sixty nine, came, into Court here sitting as a Court of Equity, the said George W. Poole, by his solicitors W. & C. W. How Craft, and filed here the following Bill, and Exhibits therein mentioned. ~

Bill

To the Honorable the Judges of the Sixth Judicial Circuit of the State of Maryland sitting in the Circuit Court for Frederick County as a Court of Equity. ~

The Bill of Complaint of George W. Poole of Washington County State of Maryland, shows that John H. Albaugh and Susanna Albaugh, by their single Bill, dated on the fifth day of November in the year Eighteen Hundred and fifty three, promised on demand, to pay to your Complainant seven hundred and sixty one dollars and thirty cents, as will be seen by said single Bill herewith Exhibited Marked Exhibit No 1 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 John H. Albaugh and Susanna Albaugh being so indebted, and intending to secure the payment thereof, did by deed dated on the third day of November Eighteen hundred and fifty three, convey unto your Complainant his heirs and assigns, certain real estate, situate in Frederick County, State of Maryland and particularly described in said deed, and certain personal chattels therein mentioned, to which said deed there is a condition annexed, that it be void on payment by the said John H. Albaugh and Susanna Albaugh his wife to your Complainant, of the afore said sum of money in said single Bill specified, with interest thereon from the date thereof, on or before the first day of October in the year Eighteen hundred and fifty five, as will be more fully seen by a Copy of said Mortgage herewith Exhibited Marked Exhibit No 2. ~

Your Complainant further states that the said defendants, being indebted to Abraham Stoner of Frederick County State of Maryland, in the sum of twelve hundred and seventy three dollars and Eighty cents, to secure the same, conveyed the real estate, described and conveyed by said defendants to your Complainant as above mentioned, to said Abraham Stoner by deed dated on the Fifth day of May, in the year Eighteen hundred and sixty six, to which deed there is a condition annexed, that it be void on payment by said defendants to said Abraham Stoner, of the said sum of twelve hundred and seventy three dollars and Eighty cents, with interest from the twentieth day of April in the year Eighteen hundred and sixty six, on or before the first day of April in the year Eighteen hundred and sixty seven, as will appear by a certified Copy of said Mortgage Marked Exhibit No 3. ~

Your Complainant further states that the said John H. Albaugh and Susanna Albaugh his wife by Bill of Sale, dated on the fourteenth day of August in the year Eighteen hundred and fifty eight, and herewith Exhibited marked Exhibit No 4, conveyed to your Complainant the personal goods and chattels therein mentioned in consideration of the sum of Eight hundred and eighty five dollars and forty three cents, which bill of Sale though absolute on its face, was intended and designed as a further security, to secure the sum of money and interest due and owing to your Complainant, and intended