would suffer irreparable loss ~ And your Complainant Complainant charges that the said Isaac P. Sumaw, is and has been diligently engaged himself, and by others with his authority and sanction, in cutting down the timber trees growing on said land.

To the end therefore that said Isaac P. Sumaw and his agents may be restrained from cutting destroying or removing any of the timber from said land, Your Complainant prays that an Injunction may be issued, restraining and prohibiting said Defendant or his agents from cutting down, removing or destroying the timber on said land, and that a sale of said Mortgaged premises may be had by a decree of this Court for the payment of the said debt due to your Complainant, and that your Complainant may have such further or other relief as his case may require. ~

May it please your Honors to grant the writ of subpoena, directed to said Isaac P. Sumaw and Mary E. Sumaw of Frederick County commanding them to be and appear in this Court on some certain day, to be therein named, to answer this Bill and to show cause, if any they have, why a decree should not pass as prayed — And as in duty bound &c ~

John Ritchie
Solicitor for Complainant

State of Maryland, Frederick County to wit:

I hereby certify that on this 12th day of November in the year 1869 before the Subscriber a Justice of the Peace of the said State, in and for said County, personally appeared John Leppo and made Oath in due form law, that the matters and things stated in the foregoing Bill of Complaint are true to the best of his knowledge and belief. ~

Filed Nov. 12th 1869 ~ James J. English J.P.

Endorsed

November 27th 1869, Let the injunction issue as prayed, on the Complainants first filing a bond, to be approved by the Court or the Clerk thereof, in the penalty of One thousand dollars. ~

John A. Lynch

Exhibit A. ~~$400.00~~ One year after date I promise to pay to Anthony Bear or order Four hundred dollars, for value received, with interest from date, payable annually, secured by Mortgage duly executed and stamped according to law. ~ Witness my hand and seal this 1st day of April Eighteen hundred and Sixty six. ~

Isaac P. Sumaw (Seal)

~~$400.00~~ Two years after date I promise to pay to Anthony Bear or order Four hundred dollars, for value received, with interest from date payable annually, secured by Mortgage duly executed and stamped according to law. Witness my hand and seal this first day of April Eighteen hundred & Sixty six.

Isaac P. Sumaw (Seal)

~~$400.00~~ Three years after date I promise to pay to Anthony Bear or order Four hundred dollars for value received with interest from date payable annually, secured by Mortgage duly executed and stamped according to law Witness my hand and seal this first day of April Eighteen hundred and Sixty six.

Filed Nov. 12th 1869 ~ Isaac P. Sumaw (Seal)

Exhibit B.

Exhibit C.