

Company' to the end that a good deed and title in fee simple, without any incumbrance could be executed to the purchaser or purchasers thereof, and that they do not believe that it will be possible to make any advantageous sale or disposition of said property, unless it can be so sold. ~

To the end therefore that the said Thomas H. Crompton of Frederick County "The Heaverton Manufacturing Company", Adam Weaver, Catharine W. Collins, and William O. Collins her husband, Charlotte Saw, Patrick H. Weaver and Benjamin Weaver, may answer the several matters and things in this Petition heretofore mentioned and set forth, as if the same were herein again specially repeated. ~ And that the said property and premises mentioned in the said deed of Trust from the "Heaverton Manufacturing Company" to the said John G. Chapman, a copy of which deed is exhibited with the papers exhibited in this cause, being all the property, rights, ways &c of the said Company in Frederick and Washington Counties of the State of Maryland, may be sold, and the proceeds of sale applied to the payment of the liens and incumbrances upon said property, according to their respective priorities, to wit. 1st to the payment of the bonds of the said Company principal and interest, according to the purport of the said deed of Trust mentioned, 2^d to the payment of the Mortgage to Caspar W. Weaver, and thirdly to distribute the balance of said purchase money among the Original Stock-holders of said Manufacturing Company, and further, that your Orators may have such other and further relief as the nature and justice of their cause may seem to admit of, require and demand; may it please your Honors to grant unto your Orators, the State of Maryland's Writ of Subpoena to be directed to the said Thomas H. Crompton, Administrator of the said Caspar W. Weaver, and to "The Heaverton Manufacturing Co Commanding them to be and appear in this Court at some certain day to be therein named to answer the premises, and abide by and perform such decree as may be passed thereon. And as in duty &c.

And may it please your Honors, to grant unto your Orators, an order of Publication against the said non residents of the State of Maryland giving notice to the said Catharine W. Collins and William O. Collins her husband, Charlotte Saw, Patrick H. Weaver and Benjamin H. Weaver of the State of Ohio, as before stated, of the substance and object of this Bill, and warning them and each of them to appear in this Court in person, or by solicitor, on or before a certain day, to answer the premises, and show cause if any - either of them have, why a decree ought not to pass as prayed ~ And as in duty your Orators will ever pray &c. -

James H. Pearce
Solicitor for Complainants

Filed Aug 2nd 1870 ~

{ Exhibit No 12
3574
Petition }

Caspar W. Weaver } No 3574 (of 2,874) Equity ~
vs } In the Circuit Court for Frederick County
John G. Chapman } sitting as a Court of Equity. ~

To the Honorable Madison Nelson Judge of the Circuit Court for Frederick County sitting as a Court of Equity. ~

The Petition of John G. Chapman and Marshall Chapman Administrators of the late Gen John G. Chapman deceased who file this Petition as well for themselves as all other creditors of the Heaverton Manufacturing Company who are interested in the execution of the trust created by a deed of Trust executed by the said "Heaverton Manufacturing Company" dated on the 26th day of