

Thousand dollars described in said Exhibit No. 3 upon all of which
 Note there is interest due to the holder the exact amount of which
 is not known to your Complainant that said Mackey have made
 default in the payment of said Notes interest and by the provision
 of said Mortgage the said D. J. Mackey is authorized to sell
 all of said Mortgage property but by reason of the continued ill
 health of the said David J. Mackey by which his mind is so
 impaired as to wholly incapacitate him from transacting business
 the said D. J. Mackey is unable to execute the trust reposed in
 him by said Mortgage and your Complainant who is
 the Son of said D. J. Mackey and has had the management and
 control of his private business since the said D. J. Mackey's unfortunate
 derangement is not able to execute said trust without the express au-
 thority of your Honorable Court, that said D. J. Mackey is still
 bound as security upon said Notes that are unpaid all of which are
 over due as stated and demand for payment has been made of said
 Jacob Walker by the holder of said Notes yet the said Mackey has not
 paid the same but continues in default and the holder of said Notes has
 threatened to institute legal proceedings against the said D. J. Mackey
 & said Mackey for the recovery of the money due upon such Notes &
 the proper protection of the property and estate of said D. J. Mackey
 requires that said Mortgage should be foreclosed & the Mortgaged
 property sold or so much thereof as may be necessary for the payment
 of said Notes. And your Complainant does further show that on
 the 1st day of March 1869 the said Jacob Walker and Mary Walker
 his wife and Lewis Bruner & Ann P. Bruner his wife by their
 deed of Mortgage of said date conveyed to Ann P. Marshall a
 portion of said Real Estate described in said Exhibit No. 1, 2 & 3
 for the purpose of securing to the said Ann P. Marshall the
 sum of Five Thousand dollars & interest owing by said Jacob
 Walker & Mary Walker his wife by their sealed Note dated March
 1st 1869 for said amount with interest as appears by a copy
 of said Mortgage filed herewith marked Exhibit No. 4. To the
 end therefore that the said Jacob Walker & Mary Walker his wife
 Lewis Bruner Ann P. Marshall. The Farmers & Mechanics National
 Bank of Frederick. Ezra Hunt, Ezra Hunt Jr and Margaret C.
 Hunt his wife and Augustus Bruner Trustees of Indell all of
 Frederick County may answer the matter and things here-
 inbefore stated fully and particularly that the Mortgaged
 Property or so much thereof as may be necessary may be sold
 for the payment of the said Notes with interest & that your
 Complainant and the said David J. Mackey in whose behalf
 and for whose protection this Bill is filed may have such other
 and further relief as the nature of the case may require &
 to your Honors shall seem right. May it please your Honors
 to grant unto your Complainant the State of Maryland writ
 of subpoena against the said Jacob Walker & Mary Walker his
 wife Lewis Bruner Ann P. Marshall the Farmers & Mechanics
 National Bank of Frederick Ezra Hunt Ezra Hunt Jr & Margaret

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