

fixtures thereunto belonging ought to be sold to the end that your Orator &
 Creatrix may be paid the same so as aforesaid due and owing them
 all which acting doing and refusals are contrary to Equity and good
 conscience and tend to the manifest wrong and injury of your said Or-
 ator and Creatrix in the premises. In consideration whereof and in as much
 as your Orator and Creatrix can only have adequate relief in the premises
 in a Court of Equity where matters of this nature are properly cognizable
 and redressable To the end therefore that the said Joseph Culbertson and
 Sarah his wife and the said Edward S. Taney may severally answer
 the several matters and things herebefore stated as fully and particular-
 ly as if they were themselves specially interrogated and that an account
 may be taken by and under the direction of the Honorable Court of
 what is due and owing to your Orator and Creatrix for principal and
 interest on the security of the said Mortgaged premises and that the
 Mortgaged premises aforesaid and the said appurtenances, machi-
 nery and fixtures thereunto belonging may be sold for payment
 of your Orator and Creatrix's claim with interest thereon to be stated
 and ascertained as aforesaid and that your Orator and Creatrix
 may have such other and further relief as their case may require
 May it please your Honors to grant unto your Orator and Creatrix
 the writ of Subpoena against the said Joseph Culbertson and Sarah
 Culbertson his wife and the said Edward S. Taney of Frederick County
 in the State of Maryland commanding them to appear in this Hon-
 orable Court at some certain day to be therein named to answer the
 premises and abide by and perform such decree as may be passed there-
 in and as in duty &c.

W. J. Ross
 Jos. M. Shuff
 Solicitors for Complainants.

Filed Oct. 16. 1868.

Exhibit No 1

This Mortgage made this 30th day of January in the year of our
 Lord 1858 by Joseph Culbertson and Sarah his wife of Frederick County
 and State of Maryland Witnesseth that in consideration of the sum
 of Five Thousand dollars (\$5000) dollars with interest thereon from
 the 1st day of April next now due from Joseph Culbertson and Sarah
 his wife to the said Edward S. Taney the said Joseph Culbertson and
 Sarah his wife do grant unto the said Edward S. Taney his heirs
 and assigns all that tract of Land lying and being in Frederick
 County and on the waters of Middle Creek and known as "Rockdale Fac-
 tory" and more fully described in a deed of conveyance from William
 Hunter to William Greason dated April 19th 1855 recorded in deed
 Book W. R. A. 26 fol. 602 &c one of the Land Records of Frederick County
 as reference being had thereto will more fully show. Provided that
 if the said Joseph Culbertson and Sarah his Wife shall pay on or before
 the 1st day of April 1859 to the said Edward S. Taney his heirs and
 assigns the sum of Five Thousand \$5000. dollars with interest thereon
 from the 1st day of April next (1858) then this Mortgage shall be void

Witness our hands and seals

Test;
David Agnew.

J. Culbertson
 Sarah Culbertson