to a certified copy of said Mortgage herewith filed marked Exhibit A which together with all other Exhibits filed or to be filed your Complainant prays may be taken as part of this his Bill of Complaint and your Complainant further shows that at the time of the execution of said deed of Mortgage both Abraham T. Stein and Martha J Stein his wife were residents of Frederick County Maryland but that since and prior to the filing of this bill and at present the said Abraham T. Stein is a resident of the State of Pennsylvania and does not reside in the State of Maryland, and he further charges that the personal property saving the fixtures to the Store room mentioned in said Mortgage has been disposed of by the said Abraham T. Stein and Martha J. Stein his wife and that it is utterly impossible to find or discover it and that the Real Estate mentioned above remains saving the store fixtures which are inconsiderable and of little value, and your Complainant further charges that no part of the aforesaid sum of money secured by said deed of Mortgage has been paid, that the time for the payment of said Mortgage debt has passed that the same is wholly due and unpaid as to principal and interest To the end therefore that the said Abraham T Stein and Martha J. Stein his wife may answer fully and particularly all and singular the matters and charges aforesaid and that the Real Estate described in Exhibit A, may be sold under a decree of your Honorable Court for the payment of your Complainants claim and that your Complainant may have such further relief as his case may require. May it please your Honor to grant to your Complainant an order of Publication giving notice to the said Abraham T. Stein a non-resident of the State of Maryland of the object and substance of this bill and warning him to be and appear in this Court either in person or by Solicitor on or before a certain day to answer the premises and show cause if any he has why a decree should not pass as prayed and to further grant the Writ of Subpoena against the said Martha J Stein of Frederick County commanding her to be and appear in this Court at some certain day to be therein named to answer the premises and show cause if any she has why a decree should not pass as prayed, and as in duty bound will ever pray &c

John C Motter
Solicitor for Complainant

Filed Aug 14. 1870.

Order of Publication

"Exhibit A"

U. S. P. Stamp $1.00

This Mortgage made this 3rd day of October in the year 1868 by us Abraham T. Stein and Martha J Stein his wife of the town of Emmitsburg, Frederick County and State of Maryland Witnesseth that in consideration of the sum of One thousand dollars now due from us the said Abraham T. Stein and Martha J Stein to Joseph Byers we the said Abraham T. Stein and Martha J Stein do grant unto the said Joseph Byers all that Lot of ground lying and being in "Shields Addition" to Emmitsburg in Frederick County Maryland and known on the plat of said town as Lot No. 1 in "Shields Addition" with the building and appurtenances thereunto belonging, as also our drugs groceries and merchandise of every description together with store fixtures, provided that if we the said Abraham T. Stein and Martha J Stein shall pay on or before the 1st day of October 1870 to the said Joseph Byers the sum of One thousand dollars with the interest thereon then this Mortgage shall be void