Wm. H. Koontz, Virginia once deceased and who was married to Emanuel Hoffman still living, and said Martha Koontz is still living, that said Martha Koontz Edward Koontz and Catharine his wife and Emma S Koontz live in Frederick County, and Hillary Hann and Laura Hann his wife James A. Koontz and Wm. H Koontz live in the State of Missouri, and said Emanuel Hoffman lives in the State of Pennsylvania that they are all Adults with the exception of said Wm H Koontz who is under the age of twenty one years, and your Oratrix charge that said first mentioned promissory note has not been paid although sundry payments of interest has been made thereon to said Grayson Eichelberger in his life time and there is still a balance due on said note of twenty one dollars and Fifty eight cents with interest from the 17th day of January 1863, that said third mentioned promissory note has not been paid but the whole of the principal of the same is still due and unpaid with interest from the 1st day of April 1863 as will appear by said notes filed herewith as Exhibits Nos 4 & 5, that your Oratrix has been unable to find the other two promissory notes and premises that they were paid in the life time of your Oratrix' testator and your Oratrix is advised said Real Estate remains charged with the balance of said notes still unpaid with the interest thereon and as the time limited by said Mortgage for the payment thereof has elapsed Your Oratrix is entitled to have said Mortgaged premises sold for the payment of the balance still due, In tender consideration whereof and to the end that the said defendants hereinafter named may answer the several matters and things herein before stated as fully and particularly as if they were herein again repeated and the said Defendants were thereto specially interrogated and that the said Mortgaged premises or so much thereof as may be necessary for the purpose may be sold for payment to your Oratrix as Executrix aforesaid of her aforesaid claim with interest as aforesaid and that your Oratrix may have such other and further relief in the premises as the nature of the case may require and to your Honor shall seem just, May it please your Honors to grant unto your Oratrix the State of Maryland Writ of Subpoena against the said Martha Koontz, Edwd. Koontz and Catharine Koontz his wife and Emma S Koontz directing them and each of them to be and appear in your Honorable on some certain day to be named either in person or by Solicitor to answer the premises and show cause if any they have why a decree should not pass as prayed and may it further please your Honor to grant unto your Oratrix an order of publication giving notice to the said Hillary Hann and Laura Hann his wife, Jas. A. Koontz, Wm H Koontz and Emanuel Hoffman who are non-residents as before stated of the substance and object of this Bill & warning 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 they have why a decree ought not to pass as prayed, And your Oratrix will ever humbly pray &c.

Milton G Urner
Solr. for Complt.

Filed Jan. 7 1871

"Exhibit 1" This Mortgage made this 30th day of April in the year 1857 by Upton Koons and Martha his wife Witnesseth in consideration of four several notes or obligations duly executed by the said Upton Koons to the said Grayson Eichelberger (that is to say) one for two hundred and twenty seven dollars payable