

No. 3527 Equity.

To the Honorable the Judges of the Circuit Court for Frederick County, sitting as a Court of Equity.

The bill of Complaint of A. H. Hoffman, George R. Staley, William J. Armstrong and J. E. Hadwicz trading under the name, style and firm of Hoffman, Staley and Co and James Getty all residents of Baltimore City in the State of Maryland and the Chambersburg Woolen Manufacturing Company of the State of Pennsylvania, respectfully represent unto your Honors that a certain John B. Picking of Frederick County, State of Maryland in the year 1868 and prior thereto was largely indebted unto the said firm of Hoffman, Staley & Co one of your Complainants for goods, wares and merchandise sold and furnished the said John B. Picking and for diverse other good and valuable considerations upon which indebtedness the said firm of Hoffman, Staley and Co one of your Complainants as aforesaid brought suit in the Circuit Court for Frederick County and on the 21st day of September A. D. 1869 did obtain Judgment against the said John B. Picking for the sum of One hundred and sixty one dollars and forty five cents with interest from the date of said judgment until paid and costs of suit, that no part of said judgment debt has been paid or satisfied all of which will appear by a short copy of said Judgment under seal herewith filed marked Exhibit No 1 which with all other Exhibits herewith filed your Complainants pray may be taken as part of their bill of Complaint.

Your Complainants further state that the said John B. Picking in the year 1868 and prior thereto was largely indebted unto James Getty another of your Complainants for goods wares and merchandise sold and furnished said John B. Picking and for diverse other good and valuable consideration upon which said indebtedness the said James Getty brought suit in the Circuit Court for Frederick County and on the 21st day of September in the year 1869 obtained Judgment against the said John B. Picking for the sum of Nine hundred and ninety five dollars and ninety four cents with interest from the date of said judgment until paid and costs of suit, that no part of said judgment debt has ever been paid or in any manner satisfied all of which will appear by a short copy of said Judgment under seal herewith filed marked Exhibit No. 2.

And your Complainants further state that the said John B. Picking in the year 1868 and prior thereto was largely indebted unto the Chambersburg Woolen Manufacturing Company another of your Complainants for goods wares and merchandise sold and furnished the said John B. Picking and for diverse other good and valuable considerations upon which indebtedness the said Chambersburg Woolen Manufacturing Co brought suit in the Circuit Court for Frederick County and on the 10th day of May 1869 obtained judgment against the said John B. Picking for the sum of two hundred and sixty nine dollars and seventy seven cents with interest from the date of said judgment and costs of suit, that no part of said judgment debt has ever been paid or in any manner satisfied all of which will appear by a short copy of said judgment under seal herewith filed marked Exhibit No 3. Your Complainants further state further state that the said John B. Picking has never paid or discharged said judgment debts or either of them or any part thereof nor given any security or satisfaction for the same and that the said debts are wholly due owing and unpaid to your Complainants as aforesaid, And your Complainants further state that while the said John B. Picking was indebted unto your Complainants as aforesaid he and his wife Mary A. C. Picking did fraudulently and criminally combine and confederate with a certain Lydia Stauffer and John Stauffer her husband for the conveyance of a certain Lot of Land situate in Frederick County from said Lydia Stauffer & John