

Subpoena

Maryland Jct:



The State of Maryland to John B Picking and Mary A. E. Picking his wife of Frederick County, Greeting. You are hereby commanded that all excuses set apart you personally appear before the Judge of the Circuit Court for Frederick County sitting as a Court of Equity to be held at the Court House in Fredericktown in and for said County on the third Monday of February next to answer the bill and complaint of Hoffman Staley & Co and others against you in our said Court exhibited, and so forth.

Henceof fail you not as you will answer the contrary at your peril. Witness the Honorable Madison Nelson Chief Judge of our said Court the 12th day of December 1869. Sealed the 21st day of January 1870.

To the Sheriff of Frederick County.

Endorsed Summons.

H. Bartgin Clerk.

Charles Mantz Clerk.

Filed Decy. 4. 1870.

Order of Publication

Hoffman Staley & Co & others

No. 352, Equity.

vs
John B Picking, Mary A. E. Picking his wife and others

In the Circuit Court for Frederick County, as a Court of Equity, December Term 1869.

The object of the bill in this cause is to obtain a decree to vacate and annul a deed of certain Real Estate conveyed to Mary A. E. Picking wife of John B Picking by Lydia Stoffer and John Stoffer her husband by deed dated on the 10th day of May A. D. 1869 and recorded in Liber C. M. No. 3 folio 4612 One of the Land Records of Frederick County, and to sell said Real Estate for the payment of the indebtedness of said John B Picking unto the Complainants. The bill states in substance that John B Picking is indebted to the firm of Hoffman Staley & Co one of the Complainants, in the sum of \$1061 45, James Cady another of the Complainants in the sum of \$995 94, to the Chamberling Iron Manufacturing Company another of the Complainants in the sum of \$269 97, upon all which indebtedness judgments have been obtained in the Circuit Court for Frederick County, that no part of said judgment debts or of either of them has been paid or any satisfaction or security given for the same, that while said John B Picking was so indebted he and his wife Mary A. E. Picking fraudulently combined and confederated with a certain Lydia Stoffer and John Stoffer her husband both of whom are non-residents of the State of Maryland for the conveyance of the Real Estate herebefore mentioned to the said Mary A. E. Picking that said John B Picking having property in his own name out of which said judgment debts could be made except that now sought to be made liable for their payment, that the consideration in said deed to wit One thousand was supplied by said John B Picking and that said deed was made by a fraudulent contrivance and arrangement among the Defendants and is therefore void. The bill then prays for a complete discovery of all transactions and conversations among the Defendants in reference to the making of said deed for all the knowledge they have as to how the One thousand dollars mentioned therein was obtained and accumulated, whether it was not the proceeds of sale of a stock of goods and merchandise belonging to the said John B Picking and from the collection of debts due the said John B Picking, the bill then prays that said deed may be vacated and annulled, that said Real Estate may be sold for the payment of said indebtedness and for general relief, and asks for an order of publication against the non-resident Defendants, calling for an answer to said Bill or in default thereof a decree pro confesso. It is thereupon adjudged and ordered this 27th day of January.