

No. 4269 Equity

Bill  
of  
Complaint

Nancy Barrick  
vs  
Dorothy A Danner  
John Danner & others

No. 4269 Equity  
In the Circuit Court for  
Frederick County, sitting  
as a Court of Equity  
May Term, 1877

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

The Bill of Complaint of Nancy Barrick of Frederick County, respectfully shews unto your Honors that heretofore, to wit: on the second day of April, in the year Eighteen hundred and sixty six, a certain Abraham Danner of said County, being indebted to your Oratrix in the sum of Fifteen Hundred Dollars by his sealed note of said date, for said amount payable to your Oratrix two years after date, with interest from date, payable annually, and intending to secure the payment of said amount with interest unto your Oratrix, did, by the deed of Mortgage of said Abraham Danner and Dorothy Danner, his wife, convey unto your Oratrix certain real estate lying in said County and particularly described in said deed of Mortgage, a certified copy of which, and of said note are filed herewith marked Exhibits Nos 1 & 2 respectively, and which, with all other Exhibits herewith filed are prayed to be taken as part of this Bill of Complaint as fully as if here inserted in words and figures; that to the said deed of Mortgage there is a condition annexed, that if the said Abraham Danner should pay on or before the 2<sup>d</sup> day of April A. D. 1868, to your Oratrix the sum of Fifteen Hundred Dollars, and the interest thereon annually according to said note then the said Mortgage should be void - And your Oratrix charges that no part of the said sum of Fifteen Hundred Dollars has been paid to her but she admits that the interest thereon was duly paid to the 2<sup>d</sup> day of April A. D. 1876, and that the whole of said debt of Fifteen Hundred Dollars with the interest thereon from the 2<sup>d</sup> day of April A. D. 1876, is still due and owing to your Oratrix although the time limited for the payment of the same by said Mortgage has long since passed. Your Oratrix would further shew that the said Abraham Danner died intestate sometime in the latter part of the year Eighteen hundred and seventy five, leaving the said Dorothy A. Danner, his widow, surviving him, now residing in the state of Pennsylvania, and leaving the following children heirs at law, viz

1 John Danner a son who is intermarried with Rachel Danner, his wife, who is an adult, and resides in the State of Iowa