No 4370 Equity

Daniel T. Lakin
vs
Adolphus Fearhake Jr
admr. &c of Jas Elliott
dec.d Adolphus Fearhake Jr &
Agnes Fearhake his wife
Chas. Houston Elliott & others

No 4370 Equity
In the Circuit Court for Frederick County. Sitting in Equity

Bill of Complaint

To the Honorable the Judges of the Circuit Court for Frederick County, Sitting as a Court of Equity. The Bill of Complaint of Daniel T. Lakin, of Frederick County, State of Maryland filed in behalf of himself and all other creditors of James Elliott, late of Frederick County, deceased who may come in and contribute to the Expenses of this Bill respectfully show to Your Honors that a certain James Elliott, of Frederick County, State of Maryland was in his lifetime seized and possessed of large and valuable real estate situate in Frederick City, Frederick County, State of Maryland as follows a House & Lot, Situate on East Church Street Frederick City Maryland and distinguished on the plat of said City as Lot, No 87, and is fully, described in a deed from Thos H. O. Neal & wife to said James Elliott, a copy, of which is herewith, filed as Exhibit No 1, which together with all other Exhibits hereinafter produced Your complainants prays may be taken and considered as part of this his bill of Complaint Also all that Lot, or parcel of ground Situate, on the East, side of North, Market, Street Frederick City Maryland conveyed to the said James Elliott, by, deed, by, John William Lambright & wife a certified Copy, of which is herewith Exhibited as Exhibit No 2. Also all that Lot, or parcel of ground Situate, on the East side of South Market Street Frederick City Maryland conveyed to the said James Elliott, by deed from John H Keller Trustee, a certified Copy, of which is herewith Exhibited as Exhibit No 3. and Your complainant, Charges that the said James Elliott, was indebted to Your complainant in the sum of, One hundred and forty, five Dollars by his promissory Note dated on the, eighth day, of, May, 1877, payable Six months after date with interest that the Same is Still due owing and unpaid as will appear by a copy, of said Note, herewith filed Marked Exhibit No 4. Your Complainant further States that, the said James Elliott, being indebted to the, Frederick Town, Savings Institution a body, Corporate, of the State of Maryland duly, incorporated by his promissory, note dated April 20th, 1876, in the Sum of, Five hundred Dollars and for the purpose of Saving the payment, thereof at Maturity, in conjection with, his wife Sarah, Executed their deed of, Mortgage conveying all that five or parcel of ground described in Exhibit No 2 herewith filed as will appear from a certified Copy, of said deed of, Mortgage herewith, filed Marked, Exhibit No 5, and said Complainant further Charges that the said James Elliott, being further indebted to the