

certain real property in Allegany County to Dawson V. Hammond as Executor. That at the time of the execution of said will Thomas Hammond to Dawson V. Hammond said Thomas was largely indebted to amount largely in excess of his whole personal estate, and largely in excess of the value of the real property in Allegany County devised to his Executor to be sold for the payment of his debts and that all the property of said Thomas Hammond outside of that conveyed by said will to Dawson V. Hammond is utterly insufficient to pay said indebtedness and that to pay said indebtedness it will be necessary to sell the real property of said Thomas Hammond lying in Frederick Carroll and Howard Counties and conveyed by said will to Dawson V. Hammond. That the consideration of the deed to Dawson V. Hammond is Love and affection and the sum of Five dollars which was never paid and if paid inadequate to the value of the property conveyed that said deed was fraudulent and void as to creditors of Thomas Hammond who were such at its date, and then said creditors have no means of obtaining payment of debts except out of said property, that said Dawson V. Hammond and wife conveyed part of said lands so conveyed to Dawson V. Hammond by said deed to Burgess Hammond for the nominal consideration of Five which said land is described in Bill of Complaint that the devise in said will named are most of them in possession of the lands devised to them, under said will claiming that said devise was not revoked by said deed to Dawson V. Hammond of June 14th 1874 and that said testator gave trusts under said devise in trust to Dawson V. Hammond in said Will, Viz: Lyde Griffith Louisa Griffith and the infant children of said Louisa are in possession of the said land named in said devise claiming an interest in and to said land under said last will, that if said will is not revoked as to the lands named in said deed to Dawson V. Hammond of June 13th 1874, by said deed and if said deed shall be declared fraudulent and void not only as to creditors of Thomas Hammond but absolutely and utterly, that then said Thomas Hammond died intestate as to said lands in Frederick Carroll and Howard Counties leaving a sister Julia Angel then surviving Louisa Griffith and Lyde Griffith her husband Upton Hammond Burgess Hammond William Hammond Charlotte Wood who intermarried with a certain Basil V. Wood and Richard Hammond children of a deceased brother of said Tho^s Hammond and the children of Regie Hammond who reside out of Maryland and whose names are unknown to complainant, and that said Regie died before the death of said Thomas Hammond The Complainants aforesaid bill filed in this Cause states that in addition to the parties named in the Original bill of Complaint as the heirs at law of said Thomas Hammond dec^d that the said Thomas Hammond also left as heirs at law Nathan Hammond and Carroll Hammond children of a deceased brother whose residences are unknown to said complainants and the children of John Hammond now deceased a brother of said Thomas Hammond whose names and residences are unknown to said complainants that said defendants do not reside in the State of Maryland; - That the

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