

No 4607 Equity

John Rouzer
 vs
 Leonard Picking, Ephraim
 Carmack & others

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

Bill of
 Complaint

The Bill of Complaint of John Rouzer of Freder-
 icks County, State of Maryland, respectfully shew to your Honor, that a certain Cas-
 sandra Picking, wife of Leonard Picking being indebted to your Complainant in
 the sum of Thirteen hundred, and seventy seven Dollars, with interest from the 17th day
 of March, in the year Eighteen hundred, and seventy three, and intending to secure
 the payment thereof unto your Complainant, did in conjunction with her husband
 Leonard Picking by their deed of Mortgage dated on the seventh day of April
 in the year Eighteen hundred, and seventy three, convey unto your Complainant, the
 Home and Lot, conveyed by John Rouzer & Emma R. Rouzer his wife to the said Cas-
 sandra Picking, at being Lot No. 23 in the town of Poochamuckstown, in Frederick
 County, Maryland, and fully described in said deed to which said deed of Mortgage
 there was a condition annexed, that if the said Cassandra Picking shall pay on or
 before the first day of April Eighteen hundred, and seventy five the aforesaid principal
 sum of Thirteen hundred, and seventy seven dollars, and the interest thereon every year
 then said Mortgage shall be void, All of which will appear by a certified copy of
 the deed from John Rouzer & wife to Cassandra Picking, and of the Mortgage from
 Leonard Picking and Cassandra Picking his wife, to John Rouzer, herewith
 exhibited, and marked Exhibit A & B, which said Exhibits together with all other ex-
 hibits hereinafter produced, your Complainant prays may be taken, and consid-
 ered, as part of this his Bill of Complaint.

And said Complainant further states that no part of the aforesaid sum of thir-
 teen hundred and seventy seven dollars, or the interest accruing thereon has been paid
 him, although the time limited for the payment thereof by the condition aforesaid has pass-
 ed and payment thereof has been demanded. But the whole of said sum of money and
 interest as aforesaid remain due, owing and unpaid

And your Complainant further states that the said Cassandra Picking the Mortga-
 ge aforesaid - died, in the year 1879, intestate, leaving a husband Leonard Pick-
 ing her surviving, but no children, but brothers, and sisters, and descendants of
 brother and sister dec'd, to whom the interest of the said Cassandra Picking in the
 lands mentioned aforesaid, descended, subject to the mortgage aforesaid, as follows.

- 1st - To the heirs of Joseph Kuhn, dec'd, a brother of the intestate Cassandra &
 whose name, or names & residence if any is unknown to your Complainant.
- 2d
- 1 - Joseph Kuhn, now residing in the State of Indiana, now resident of the State of
 Maryland &
- 2 - Frank Kuhn, residence in the City of Balto.
- 3 - Eliza Kuhn, married to Herring, now resident of St. of Ind residence
 unknown.
- 4 - Louisa Kuhn, married to Herring, and resided when last heard from in
 Carroll County Maryland.
- 5 - Ellen Jane Kuhn, resided when last heard from in Carroll County Ind.
 Children of Gebulon Kuhn, a deceased brother of intestate
 Margaret Kuhn, who married Mr. Henry Staley and is now dead, a deceased sister
 of said intestate, but whether she left children living at her death, or their names & residence
 is unknown to your Complainant.