

No. 4411 Equity

Eliza Crouse, James S. Crouse and
Joseph A. Germand, Exors & Adors
of Michael Crouse, George W. Rowe
and Eugene L. Rowe, Partners, tra-
ding as, George W. Rowe & Son, James
T. Hays and James A. Elder

James A. Cudorff & Mary E. Cudorff

Proceedings recorded Oct. 19, 1883
Test

Adolphus Fearhake, Jr
Clerk

To the Honorable the Judges of the Circuit Court for Frederick County
As a Court of Equity.

Bill of Complaint

The Bill of Complaint of Eliza Crouse, James S. Crouse and Joseph M. Germand, Executors and executrix of the last will of Michael Crouse late of Frederick County, deceased, of George W. Rowe and Eugene L. Rowe partners, trading under the name, firm and style of George W. Rowe & Son, of James T. Hays and of James A. Elder, all of Frederick County, respectfully states, that a certain James A. Cudorff, of Frederick County, on the Twenty-seventh day of March, in the year Eighteen hundred and seventy-seven, executed and delivered to a certain John R. Storer, his single Bill, for the sum of fourteen hundred and forty-one dollars, with interest from date, payable twelve months after date to said John R. Storer or order, the consideration of said single bill being mostly, if not exclusively, time sold and used for fertilizing the real estate hereinafter described, and said John R. Storer endorsed and delivered said single Bill for a valuable and bona fide consideration, to a certain Michael Crouse, during the life time of said Michael Crouse, that said Michael has, since receiving said single bill, died, leaving his last will and testament, which has been duly admitted to probate, by the Orphan's Court for Frederick County, whereby he constituted and appointed your Complainants, Eliza Crouse, James S. Crouse and Joseph A. Germand, executor and executrix of his said will, to whom letters testamentary have been granted by said Orphan's Court, and your Complainants file herewith as part of this bill, an exemplification of said Letters Testamentary, marked Exhibit No. 1.

Your Complainants further state, that said single bill is wholly due and unpaid, both as to principal and interest, a copy whereof is herewith filed as part hereof, marked Exhibit No. 2.

Your Complainants further state, that said James A. Cudorff is also indebted to your complainants, George W. Rowe and Eugene L. Rowe, who are partners, trading under the name, firm and style of George W. Rowe & Son, upon a single bill, signed by said James A. Cudorff, dated on the eighteenth day of November, in the year eighteen hundred and seventy-two, for the sum of Three hundred and seventy-nine dollars, and eighty-nine cents, with interest from date, all of which is wholly due and unpaid and a copy whereof is herewith filed as part hereof, marked "Exhibit No. 3".

Your Complainants further state, that said James A. Cudorff, is further indebted unto your Complainants George W. Rowe and Eugene L. Rowe, trading as aforesaid, as George W. Rowe & Son, upon a certain promissory note or obligation in writing, dated on the Twenty-first day of July