No. 5229 Equity

Original Bill

Aubrey Pearce, James M Fisher and Edward V. Shark partners trading under the name, firm and style of Pearce Brothers & Co. Plaintiffs

against

John Kunkel, Charles E Kunkel and William P. Kunkel Administrators of the goods, chattels &c of John B Kunkel deceased John Kunkel and Mary C Kunkel his wife Charles E Kunkel William P. Kunkel, Elizabeth McCrery, William H. Ramsburg and Harriet P. Ramsburg his wife, Steuber Schley and Lillian J Schley his wife, John H. Wilson and Mary B. Wilson his wife, The Catoctin Iron Company, Mary Catherine Kunkel, Amelia Frances Kunkel and Ann Claggett Defendants

In the Circuit Court for Frederick County sitting in Equity.

To the Honorable the Judges of said Court.

Your orators of Baltimore City, who sue as well for themselves as for all other Creditors of John B. Kunkel late of Frederick County deceased, who will come in and contribute to the Expenses of this suit, Complaining, say—

1. That the said John B. Kunkel was, in his lifetime, indebted unto your orators Aubrey Pearce, James M Fisher and Edward V. Shark partners trading under the name, firm and style of Pearce Brothers & Co, in the full and just sum of ten hundred and thirty Eight dollars and and forty two cents on a certain promissory note to the said Pearce Brothers & Co, in his lifetime, dated the fifteenth day of January in the year Eighteen hundred and Eighty five and payable four months after the date thereof, as will fully appear by reference to said promissory note herewith filed as part hereof marked Exhibit No. 1.

2. That the said John B Kunkel being so indebted as aforesaid unto your orators and also unto divers other persons and having real and personal estate of great value, departed this life intestate on or about the fifth day of April in the year Eighteen hundred and Eighty five and leaving the following children surviving him as his heirs at law, viz—

(a) John Kunkel a son, who has intermarried with Mary C Kunkel, both of whom are of full age and reside in the State of Pennsylvania.

(b) Charles E. Kunkel a son, who is unmarried, of full age, and resides in Frederick County.

(c) William P. Kunkel, a son, who is unmarried of full age and resides in Frederick County.

(d) Elizabeth McCrery, a daughter whose husband is dead, and who resides in Frederick County.

(e) Harriet P. Ramsburg, a daughter, who is married to William H. Ramsburg both of whom are of full age and reside in Frederick County.

(f) Lillian J. Schley, a daughter, who is married to Steuber Schley,