No. 5229 Equity

Petition to amend Bill.

Pearre Brothers & Co
Plaintiffs
against
John Kunkel et al
Defendants

No. 5229 Equity

In the Circuit Court for Frederick County sitting in Equity.

To the Honorable the Judges of said Court

Your petitioners the Plaintiffs in the above entitled cause complaining say

1. That heretofore to wit, on the twenty Eighth day of September in the year Eighteen hundred and Eighty Six, they filed their Bill of Complaint in your Honorable Court in this cause.

2. That under the provisions of the last will and testament of John Kunkel a copy of which is filed in said cause as Exhibit No. 2, a certain Barbara Ann Hogg is entitled to an annuity of three hundred dollars which said annuity is a lien or charge upon the lands devised by said last will and testament.

3. That the said Barbara Ann Hogg is still living although your petitioners at the time of filing their said Bill of Complaint believed she dead

4. That the said Barbara Ann Hogg is a necessary party to said cause and should be made a defendant thereto — And your petitioners would pray leave to amend their said bill of Complaint and to make said Barbara Ann Hogg a party defendant thereto, and that they may have such other and further relief as they may be entitled to.

And as in duty bound &c

William P. Manlsby Jr
Eugene L. Rowe
Solrs. for Plaintiffs

Ordered this 13th day of December A.D 1886 by the Circuit Court for Frederick County sitting in Equity, and by the authority thereof, that the Plaintiffs in this cause have leave to amend their bill of Complaint and to make Barbara Ann Hogg a party defendant thereto, and that process issue accordingly.

John A. Lynch
Judge of the Cir. Court.

Filed Dec. 13. 1886

Amended Bill

Aubrey Pearre, James M Fisher and Edward V. Shorb partners trading under the name firm and style of
Pearre Brothers & Co.
Plaintiffs
against
John Kunkel, Charles E Kunkel and William P. Kunkel Administrators &c of John B. Kunkel deceased et al

No. 5229 Equity

In the Circuit Court for Frederick County sitting in Equity.