No. 5229 Equity

To the Honorable the Judges of said Court

Your orators Aubrey Pearce, James M. Fisher and Edward V. Short partners trading under the name firm and style of Pearce Brothers & Co. 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 against John Kunkel, Charles E. Kunkel and William P. Kunkel administrator 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 McCrory, William H. Ramsburg and Hamit P. Ramsburg his wife, Steuer Schley and Lillian F. Schley his wife, John K. Wilson and Mary B. Wilson his wife, The Catoctin Iron Company, Mary Catherine Kunkel, Amelia Frances Kunkel and Ann Claggett praying amongst other things for a sale of certain real estate therein mentioned as in said Bill is particularly set forth.

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 all of which will fully appear by reference to said 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 all of which will fully appear by reference to said Exhibit No. 2.

3. That the said Barbara Ann Hogg is still living and resides in Baltimore City, although your orators at the time of filing said bill were ignorant of said fact but were advised that she was dead.

4. That the said Barbara Ann Hogg is a necessary party to said cause and should be made defendant thereto as your orators are advised.

To the end therefore

1. That the said John Kunkel, Charles E. Kunkel and William P. Kunkel administrators of John B. Kunkel deceased, John Kunkel and Mary C. Kunkel his wife, Charles E. Kunkel and William P. Kunkel, Elizabeth McCrory, William H. Ramsburg and Hamit P. Ramsburg his wife, Steuer Schley and Lillian F. Schley his wife, John K. Wilson and Mary B. Wilson his wife, The Catoctin Iron Company, Mary Catherine Kunkel, Amelia Frances Kunkel and Ann Claggett may answer this amendment,

2. That the said Barbara Ann Hogg may answer as well the matters charged in the original bill of complaint as in this amended bill

3. That your orators may have such relief against the said Barbara Ann Hogg as is prayed by their original bill against the said John Kunkel, Charles E. Kunkel and William P. Kunkel, administrators of John B. Kunkel deceased John Kunkel and Mary C. Kunkel his wife, Charles E. Kunkel, William P. Kunkel, Elizabeth McCrory, William H. Ramsburg and Hamit P. Ramsburg his wife, Steuer Schley and Lillian F. Schley his wife. John K. Wilson and Mary B. Wilson his wife, The Catoctin Iron Company, Mary Catherine Kunkel, Amelia Frances Kunkel and Ann Claggett.

May it please your Honors to grant unto your Orators the Order of publication giving notice to the said John Kunkel administrator and in his own right and Mary C. Kunkel his wife, adults, and both residing in the City of Philadelphia in the