Petition of Lucy R. Smith & Husband

No. 5733. Equity.

Petition of Lucy R. Smith and Husband.

Charles H. Worthington
vs
Albert P. Worthington
Nicholas J. Worthington
and others

No 5733 Equity

In the Circuit Court for Frederick County in Equity.

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

The petition of Lucy R. Smith of Frederick County, State of Maryland, and H. Yates Smith, her husband, respectfully shows to your Honors,

That Charles H. Worthington the plaintiff in this cause being indebted unto your petitioner Lucy R. Smith by his promissory note dated February 13th 1891, and payable six months after date to the said Lucy R. Smith or order for the sum of Sixteen hundred dollars, for the purpose of securing the payment of the said promissory note at the maturity thereof, did on the said 13th day of February A.D. 1891, Execute a Mortgage to the said Lucy R. Smith, covering his interest in the real Estate mentioned in this Cause a for the sale of which a decree is prayed herein, a certified copy of which Mortgage is herewith filed marked L.R.S. and which your Petitioners pray may be taken and considered as part of this their petition.

And your petitioners further pray your Honors to pass an order admitting your petitioners as parties defendant to this Cause.

Lucy R. Smith
H. Yates Smith

The aforegoing petition having been read and considered, it is thereupon this 12th day of March A.D. 1891, by the Circuit Court for Frederick County, sitting as a Court of Equity, ordered and decreed that the said Lucy R. Smith and H. Yates Smith her husband be and they are hereby admitted as parties defendant to the above Cause.

John A. Lynch
Judge of the Cir. Court

Filed March 12th 1891.

Exhibit L.R.S.

Exhibit (L.R.S.)

At the request of Lucy R. Smith the following Mortgage is received for Record and recorded February 13th 1891, at 3 O'clock 45 Minutes P.M.

Test. W. Irving Simons, Clerk

This Mortgage, made this thirteenth day of February in the year Eighteen hundred and ninety one, by me, Charles H. Worthington of Frederick County State of Virginia, but now temporarily in Frederick County, State of Maryland, Witnesseth, that whereas I the said Charles H. Worthington by my promissory note of even date herewith, payable to Lucy R. Smith or order, six months after date, for the sum of Sixteen hundred dollars, stand indebted unto the said Lucy R. Smith in the sum of money in said promissory note recited, and for the purpose of securing the payment of the said promissory