

No. 6131. Equity.

William H. Wagner

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Horatio Ciler and Susan
M. Ciler, his wife and
George P. Buckley

No. 6131 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 Bill of Complaint of William H. Wagner of Frederick County,
Maryland, who files this bill in his own behalf, as well as in
behalf of all the other Creditors of Horatio Ciler, who may come
in and contribute toward the expenses of this suit respectfully
represents unto your Honors,

1st That the said Horatio Ciler on the 30th day of November
in the year 1872 by his promissory note payable in four months
from date, with interest from date, became indebted unto the
plaintiff in the full and just sum of Eighty one dollar and
seventy five Cents; that on the 30th day of November in the year
1872 by his other promissory note payable in three months from
date with interest from date became indebted unto the plaintiff
in the full and just sum of twenty eight dollars; that the said
Horatio Ciler also in the year 1872 became indebted unto the
plaintiff in an open account for the sum of forty dollars and
twenty five Cents, all of which debts are due and unpaid, and
which promissory notes and accounts are filed herewith marked
respectively Exhibits Nos 1, 2 & 3 and which Exhibits with such
other Exhibits as the plaintiff may file herewith, it is prayed
may be considered as part of this Bill.

2nd That for many years the said Horatio Ciler owned and
stood seized and possessed of a certain tract of land situated
in Frederick County, Maryland, which on the 15th day of May
in the year 1873, he conveyed to his wife Susan M. Ciler
for and in consideration of the love and affection he
bore her and the nominal sum of five dollars, which
sum of money was never paid by her or intended to
be paid by her, a certified copy of which deed as recorded
among the Land Records of Frederick County is filed herewith
marked Exhibit No. 4. to this Bill.

3rd That the deed to his said wife was made for the
purpose of hindering, delaying and defrauding the Creditors
of the said Horatio Ciler out of their just claims and
especially the plaintiff and was without any valid consideration.

4th That on said 15th day of May in the year 1873 the
said Horatio Ciler also for the pretended consideration of
four hundred dollars by bill of sale assigned to his said
wife Susan M. Ciler all of his personal property, and thus
by said deed and bill of sale stripped himself of all his
property for the purpose of defrauding his creditors out of