

No. 6743. Equity.

reconveyance was accordingly executed, and subsequently recorded on the 18<sup>th</sup> day of January 1879, which said deeds so executed and recorded your Complainant asserts and charges were covinous, fraudulent and void, were voluntary, and without consideration and executed to hinder delay and defraud the Creditors of the said Edward P. Hoontz and therefore null and void, Copies of which said deeds are herewith filed and marked respectively Exhibits 37-41

(4) That the said Charles E. Hoontz is a minor under the age of 21 years.  
(5) That all the parties are residents of Frederick County, State of Maryland. To the end therefore that the deeds from Edward P. Hoontz to Eddie C. Hoorn and the deed from Eddie C. Hoorn to Alice V. Hoontz and her minor son Charles E. Hoontz may be declared null and void and set aside -- May it please your Honors to grant the following relief:

(1) That the deed from Edward P. Hoontz to Eddie C. Hoorn be declared null and void.

(2) That the deed from Eddie C. Hoorn to Alice V. Hoontz and Charles E. Hoontz, her minor son, be declared null and void.

(3) That your Honors order the real estate described in Exhibit No 2 to be sold by a trustee, appointed by your Honorable Court for that purpose, and out of the proceeds thereof direct the said trustee, after the payment of costs and expenses, and Commissions to apply the necessary amount to the payment of the debt of your Complainant, provided the said Defendant does not pay the aforesaid indebtedness of the plaintiff within one week after the said deeds are declared null and void.

(4) And for general relief.

And your Complainant prays for the following orders:

That a writ of subpoena may issue out of your Honorable Court directed to the said Edward P. Hoontz, Eddie C. Hoorn, Alice V. Hoontz and Charles E. Hoontz, her minor son, all residents of Frederick County, State of Maryland, commanding them and each of them in person by attorney, and the said minor, Charles E. Hoontz, to be and appear by guardian, to be and appear in your Honorable Court on some day certain certain to be named therein, and show cause if any they may have why a decree should not be passed as prayed, and to stand to abide by, and perform such order and decree as the Court may pass in the premises.

will pray &c.

John C. Moller  
P. Frank Pempel  
Rel. for Compl.

Felic May 6. 1877

Exhibit No 1.

Mary C. Hoontz

Edward P. Hoontz

No 4452 Equity  
In the Circuit Court for  
Frederick County

This is a proceeding by the Plaintiff to Collect from her late husband, the Defendant, alimony long over due. On the 29<sup>th</sup> day of March A. D. 1879. this Court passed a Decree

Exhibit No 1.