No. 6511 Equity.

Bill of Complaint.

Mortgagee aforesaid and that on the 15th day of September in the year 1894, the children of the said Harriet Louisa McAleer, to wit: the said Hugh McAleer Jr. and others, as heirs at law aforesaid, conveyed their interests in the real estate mentioned and described in these proceedings to Michael Frank McAleer, the owner of the Equity of redemption in said property as appears by Exhibit No. 9. – as will appear by a certified copy of the deed conveying the same herewith filed marked Exhibit No. 10.

And the plaintiff prays for the following relief:-

That the said defendant Michael Frank McAleer, may answer the several matters and things hereinbefore stated and charged and that the mortgaged premises aforesaid, or so much thereof as may be necessary, may be sold for the payment of your Oratrix respective mortgage debts, with interest thereon as aforesaid. And, secondly:- For such other and further relief as the Nature and Equity of the case of your Oratrix may require.

May it please your Honors to grant unto your complainant the writ of Subpoena, against the said Michael Frank McAleer, of Frederick County, State of Maryland, commanding him to appear in this Court on some certain day to be named therein, to answer the premises and abide by and perform such decree as may be passed therein.

And as in duty &c.

Ross, Reich & Newman,
Solrs for Complainant.

Exhibit No. 1.

At the Request of Hugh McAleer the following Deed was recorded February 16th 1863.
Stamped & Cancelled.

This Deed made this Sixteenth day of February in the year Eighteen Hundred and Sixty three by me William J. Ross, Trustee, Witnesseth:

Whereas by a decree of the Circuit Court for Frederick County as a Court of Equity passed on the 16th day of September in the year Eighteen Hundred and Sixty one, in the case of William R. Sanderson Executor of the last Will and testament of William R. Sanderson deceased Complainant and Josiah Jones and Mary E. Jones his wife, and others defendants, I, William J. Ross was appointed trustee to sell the land decreed to be sold, and have sold the same to Hugh McAleer for the sum of fourteen thousand two hundred and eighty one dollars, who has fully paid the purchase money therefor

Now therefore I William J. Ross the trustee as aforesaid in consideration of the premises do grant unto the said Hugh McAleer all the right and title of all the parties to the aforesaid cause in and to all those pieces or parcels of land situate, lying and being in Frederick County and State of Maryland, as follows:

All that part of "Monocacy Manor." Beginning at a stone where formerly stood a Black Oak tree, the beginning of lots No. 42 & 44 and running thence North thirty four and a half degrees