

Bill of Complaint.

No. 6832 Equity

Nachel J. Brown, Joseph M. Brown and  
William P. Brown, partners trading  
under the name, firm and style  
of V. J. Brown & Sons.  
Plaintiffs.

William W. Wimbrenner and Emma  
R. Wimbrenner, his wife, Defendants.

No. 6832 Equity

In the Circuit Court for Frederick  
County, sitting as a Court of  
Equity.

To the Honorable the Judges of said Court:-

Your orators, complaining say:-

1. That they are Co-partners as wholesale grocers in the City of Baltimore trading under the name, firm and style of V. J. Brown & Sons and that the defendant William W. Wimbrenner till some time in the month of August in the year Eighteen hundred and Ninety seven and prior to said year was a retail merchant doing business in the village of Graceham in Frederick County, in the State of Maryland.
2. That on the fourteenth day of April in said year and subsequent up to August 17th 1897. the said William W. Wimbrenner became indebted unto your orators in the sum of one hundred and thirty four dollars and sixty five cents for goods sold by your orators to him, on which he paid the sum of thirty dollars on July 24th 1897 and also a like sum of thirty dollars on August 18th 1897. leaving a balance of indebtedness to your orators of seventy four dollars and sixty five cents as will appear from a copy of the invoice therefor filed herewith as part hereof marked "Exhibit A."
3. That on the eleventh day of October in the year Eighteen hundred and Ninety seven your orators recovered before one Henry Stokes a Justice of the Peace of the State of Maryland in and for Frederick County, a judgment against the said William W. Wimbrenner for said balance of indebtedness and also for one dollar and fifty cents, a copy of which judgment under the hand and seal of the said Justice was on the following day recorded in the office of the Clerk of the Circuit Court for Frederick County, as will appear from a duly certified copy of said recorded copy herewith filed as part hereof marked "Exhibit B."
4. That since the rendition of said judgment to wit on the fourteenth day of December 1897 your orators received on said judgment the sum of Twenty Dollars and ninety four cents by attachment of certain money in the hands of a certain Birch & Osler as will appear from said Exhibit B.
5. That on the 14th day of April 1897. prior thereto and up to August 10th 1897. the said William W. Wimbrenner was the owner of certain real estate situated in said Village of Graceham.
6. That on or about August 10th 1897. the said William W. Wimbrenner sold out his entire stock in trade for cash without paying off the debt due to your orators and on said date together with his wife the defendant Emma R. Wimbrenner conveyed the aforesaid real estate to one Maggie A. S. Routzahn in consideration of Four Hundred and Fifty Dollars and of certain real estate of the said Maggie A. S. Routzahn conveyed at the time by her and her husband to the said William W. Wimbrenner which said last mentioned deed has never been recorded and your orators file herewith as part hereof a duly certified copy of said deed to

Bill of Complaint

Exhibit

Exhibit