

W 8845, Equity.

4th. That the said Daniel B. Crouse, and Elizabeth B. Crouse, his wife, being indebted unto a Certain Michael Kline in the sum of one Hundred and Fifty Dollars, in order to secure the same of one Hundred and Fifty Dollars, in order to secure the same executed a mortgage conveying the property described in Exhibit A to the said Michael Kline, for the purpose of securing the payment of the said mortgage indebtedness, as will appear by a Certified Copy of said mortgage filed herewith as a part hereof marked "Exhibit C"; and that so far as your Complainant is advised, there is still due and owing on account of said mortgage indebtedness the sum of One Hundred and Fifty Dollars with interest.

5th. That prior to the death of the said Daniel B. Crouse the said Daniel B. Crouse, together with his wife, Elizabeth Crouse, executed a deed bearing date the 18th day of January, in the year 1912, to a Certain Cyrus F. Flood, conveying unto him the land mentioned in Exhibit A, as will appear by said original deed filed herewith marked "Exhibit D" and your Complainant alleges and so charges that said conveyance to the said Cyrus F. Flood, was without consideration and is a fraud upon the rights of your Complainant as well as the other creditors of the said Daniel B. Crouse, and so far as it affects said creditors is null and void and should be so declared by your Honorable Court.

6th. That the personal estate of the said Daniel B. Crouse was entirely insufficient to pay the funeral expenses and Physicians bill incident to the last sickness and death of the said Daniel B. Crouse, and is entirely insufficient to pay the debt of your Complainant; and that the real estate mentioned in Exhibit A should be sold under a decree of your Honorable Court, and the proceeds therefrom, after the payment of the mortgage indebtedness thereon as represented by Exhibit C, should be applied to the payment of the claims of your Complainant and such other of the creditors of the said Daniel B. Crouse who may come in and contribute to the costs and expenses of the suit.

In the End therefore,

(A) That the deed given by the said Daniel B. Crouse and Elizabeth Crouse, his wife, to Cyrus F. Flood, filed as Exhibit D, may be declared null and void so far as it affects the rights of the creditors of the said Daniel B. Crouse.

(B) That the real estate mentioned in exhibit A, may be