

Peregrine Gorsuch dated on the fourth day of April eighteen hundred and seventy six and recorded among the Land Records of Harford County in Liber \_\_\_\_ No. \_\_\_\_ folio \_\_\_\_ &c.

Another tract of land situated partly in Carroll county and partly in Frederick county containing about one hundred and twenty acres and is particularly described in a deed from Charles T. Reifsnider, trustee to the said Peregrine Gorsuch dated April the ninth eighteen hundred and seventy four and recorded among the Land Records of Carroll County in Liber J.B.B. No. 43 folio 492 &c and among the Land Records of Frederick county in Liber T. G. No. 1, folio 741 &c.

Eighth That on the second day of August eighteen hundred and eighty the said Ann M. Gorsuch executed a deed to the said Elizabeth A. Gorsuch for the said lot of ground on the north west corner of Lombard and Penn streets for the alleged consideration of Five thousand dollars as will appear by a deed of that date recorded among the Land Records of Baltimore City in Liber F. A. P. No. 876 folio 203 &c.

Ninth That on the fourth day of November eighteen hundred and eighty one by deed of that date duly recorded among the Land Records of Baltimore City in Liber F.A.P. No. 913 folio 68 &c the said Ann M. Gorsuch assigned to the said Elizabeth A. Gorsuch the said lot of ground on the north side of Monument street and the said lot of ground on the east side of Aisquith street sixty five feet north from Chew street for the alleged consideration of Five thousand dollars.

Tenth That on the twenty first day of February eighteen hundred and eighty three by deed of that date recorded among the Land Records aforesaid in Liber R.T.A. No. 957 folio 461 &c the said Ann M. Gorsuch for the alleged consideration of Two thousand dollars conveyed to Elizabeth A. Gorsuch the other lot of ground on the east side of Aisquith street beginning eighty feet north from Chew street.

Eleventh That the said Ann M. Gorsuch on the twenty first day of February eighteen hundred and eighty three by deed of that date recorded among the Land Records of Baltimore County in Liber W. M. I. No. 133 folio 188 &c for the alleged consideration of One thousand dollars assigned to the said Elizabeth A. Gorsuch the said lot of ground on the north side of Oxford street in Baltimore County.

Twelfth That the said Elizabeth A. Gorsuch hath executed a mortgage upon the said lot of ground on the north west corner of Lombard and Penn streets to the Eleventh German American Building Association of Baltimore City (a body corporate duly incorporated) as will appear by reference to said mortgage recorded among the Land Records of Baltimore City in Liber R. T. A. No. 964 folio 327 &c.

Thirteenth And your complainants further state that the mortgage held by the said Body Corporate is valid and bona fide and that under the charter of said Body Corporate the mortgager is entitled to have said mortgage released upon the payment of the balance of the money due thereunder.

Fourteenth Your orator and oratrix further complaining aver and charge that the said deeds from the said Ann M. Gorsuch to the said Elizabeth A. Gorsuch and the considerations set forth therein were not actual bona fide and in good faith but were false and pretended and have no real existence and a fraud upon your orator and oratrix as well as upon all other persons claiming under said deed from Peregrine Gorsuch to the said Ann M. except the said Elizabeth A.

Fifteenth Your complainants further show that the said Ann M. Gorsuch hath from the estate of the said Peregrine under said deed from him to her purchased of Edward Higgins trustee by deed dated July the fourteenth eighteen hundred and seventy seven and recorded among the Land Records of said City in Liber F.A.P. No. 811 folio 173 &c. a lot of ground on the east side of Biddle street four hundred and thirty four feet and eight inches, easterly from