

WILLIAM S. STONER AND WIFE

VS.

JOHN C. STONER ET AL.

NO. 8433 EQUITY.
 # IN THE CIRCUIT COURT
 # FOR FREDERICK COUNTY,
 # AS A COURT OF EQUITY.

To the Honorable the Judges of the Circuit Court for Frederick County, as a Court of Equity:-

The Petition of William S. Stoner and Martha A. Stoner, his wife, the Plaintiffs in the above entitled cause, respectfully shows unto your Honors:-

That after the filing of their Bill of Complaint but prior to the issuing of the process prayed for therein, your petitioners discovered that John C. Stoner, one of the Defendants, had on the second day of July A.D. 1888 executed a mortgage to his wife, Susie E. Stoner, on his undivided interest in the real estate mentioned in the Bill of Complaint.

Your petitioners therefore pray that they may be permitted to amend their original Bill of Complaint by inserting therein the following paragraph, to-wit:

2 1/2.

That on the second day of July A.D. 1888 the above mentioned John C. Stoner executed a mortgage to his wife, Susie E. Stoner, on his interest in the above described real estate to secure an indebtedness of five hundred dollars, therein mentioned, which mortgage is recorded in Liber W.I.P. No. 7 folio 349 etc. one of the Land Records of Frederick County, a certified copy whereof is filed herewith as part hereof, marked Exhibit No. 2.

And as in duty etc.

Charles P. Lenz
 Sol. for Plffs.