April Term 1868.

Josephine Chatterton
vs
John Chatterton

Be it remembered that heretofore to wit, on the thirteenth day of April in the year Eighteen hundred and sixty one come into the Circuit Court for Baltimore County here, sitting in Equity, Josephine Chatterton by R. J. Gettings and A. W. Machen Esqrs her Solicitors and files in Court here the following Bill of Complaint, to wit,

To the Honorable John H. Price, Judge of the Circuit Court for Baltimore County

Sitting in Equity

Humbly complaining sheweth unto your Honor your oratrix Josephine Chatterton of Baltimore County. That she is a married woman & the wife of Robert M. Chatterton that in the year 1854 she resided (with her husband) in the City of Philadelphia and on or about the third day of March in that year a certain Daniel P. Chatterton, brother to her said husband exhibited to her a deed whereby in consideration of personal services rendered by your oratrix to him & of other causes him thereto moving and in anticipation of his own decease, which occurred shortly afterwards he conveyed to her certain valuable cabinet furniture, stock, fixtures and the lease of a certain store No. 211 in second street in the County of Philadelphia to be held enjoyed by her to her sole and separate use & free from any liability for the debts of her said husband and afterwards your Oratrix who went into possession of the property so conveyed to her out of the proceeds thereof loaned, considerable sums to a certain John Milliken and subsequently that is to say on or

April Term 1868

about the 25th of July 1856 being desirous of investing the same in a more permanent form purchased from one John A. Brown the leasehold of a certain house and lot in Eleventh Street in the City of Philadelphia at the price of $4.000, less $1,060 the value of a rent charge it was subject to, and paid for the same out of her said seperate property. Your Oratrix being at the time of the said purchase a married woman as aforesaid & without a formally constituted trustee, it was deemed convenient that the legal title of the said house and lot should be vested in a certain John Chatterton, a brother of her said husband and at that time a citizen and resident of the City of New York, and accordingly a deed was executed by the said Brown to the said John Chatterton though the purchase money therefore was entirely paid by her out of her separate estate as aforesaid. For the said Eleventh Store house & lot your Oratrix paid six hundred dollars in cash part of the proceeds of the said gift or grant of Daniel P. Chatterton and at the same time delivered to the said John A. Brown the negotiable note of the said John Chatterton bearing date July 25. 1856 & payable six months thereafter, for the sum of One thousand dollars, which note was afterwards paid out of monies of your Oratrix in the hands of the said John Milliken of her seperate estate as aforesaid, six hundred dollars being paid thereon at the instance of your oratrix on the 22nd December 1856 by the said Milliken to certain Williams & Ellis a Mercantile firm in the City of Philadelphia, to whom the said Brown had endorsed it and the residue being afterwards in like manner paid by said —