shillings and three pence Gold and Silver Current money, to the said Brice Thomas Beale Worthington on the said mortgage which last mentioned sum of Gold and silver current money with Interest the said Richard Robertson, did agree with the said Brice Thomas Beale Worthington should be placed, charged and secured in and upon the tracts or parcels of Land comprised in the said Indenture; and that the Lands and premises should not be redeemed, or redeemable untill the said sum of one hundred and forty five pounds three shillings and three pence gold and silver current money, with Legal Interest thereon should be first paid, as in and by the said Indorsement on the back of the said Indenture and to which your Orators and Oratrixes refer the same being herewith filed and marked as Exhibit A. may more fully and at large appear, and which Orators and Oratrixes pray may be taken as part of this, their Bill of Complaint.

Your Orators and oratrixes further show that shortly after the Indorsment made as aforesaid on the said Indenture, to wit, on or about the fifteenth day of October in the year of our Lord one thousand seven hundred and eighty two the said Richard Robertson assigned transferred and made over all his right title and Equity of Redemption of in and to the said mortgaged premises to a certain Minian Riggs one other of the defendants herein named which said Minian by Indenture bearing date, on or about the ninth day of June seventeen hundred and eighty seven, did assign transfer and make over all his right, title, Interest and Equity of redemption of in and to the said mortgaged premises, to the other defendant herein named, Thomas Bicknell, who hath ever since occupied and enjoyed the said Lands and premises and

converted the rents and profits thereof to his own use your orators and Oratrixes further show that the said sum of one hundred & forty five pounds three shillings and three pence Gold Current money with the accruing interest thereon is still due and unpaid that the said Brice Thomas Beale Worthington departed this life some time in month of August seventeen hundred and ninety three having first made his last will and testament in writing, whereof he appointed your Orator John Worthington and your Oratrix Henrietta Worthington Executors and who have since taken upon themselves the burthen and Execution of the trust in them reposed; That the said Mortgagee at the time of his death left seven children, to wit, your Orator John Worthington, Henry Worthington, and Brice Thomas Beale Worthington and your Oratrixes Elizabeth Worthington, Henrietta Worthington, Sarah Simpson (who hath intermarried with your Orator Basil Simpson) and Polly Worthington (who hath intermarried with your orator John Polly Worthington) his heirs at Law. And that (the said Brice Worthington the testator being dead) the estate and Interest in the said mortgaged premises is now become absolute in your Orators and Oratrixes; and they well hoped that the said Defendants or some of them would either have paid to the Executors of the deceased the mortgage money with Interest thereon due or would have suffered your orators and oratrixes to have peaceably and quietly held and enjoyed the said premises: and for that purpose the complainants have frequently applied to the said defendants and requested them and each of them to pay the principal and Interest due on the said mortgaged premises or else to deliver up possession of the same to the Complainants and to release all the right the right title and Equity of redemption of in and to the same premises to your orators and oratrixes in fee. The said Defendants well knowing the said premises are a slender and scanty security for the principal and Interest now due thereon; and your Orators and Oratrixes well hoped