is still pending and in the course of which your Orator hath been appointed by the Commissioners of Insolvent debtors for the City and County of Baltimore the Permanent Trustee of said Insolvent and hath given bond as such with security which was approved by said Commissioners before the institution of this suit.

And further Complaining sheweth unto your Honors your Orator that he hath been appointed by the Orphans Court of Baltimore County administrator de bonis non of Eaton R. Partridge deceased and that on the 22nd day of February 1839 the said Charles Grover was indebted to the Estate of the said Eaton in a large sum of money to wit the sum of five thousand dollars theretofore advanced by the said Eaton to the said Grover to be by him employed in the lumber business on their joint account and that of one Daniel Brook and to be returned to him on the 21st day of February 1839 and that the said monies remained due by the said Charles Grover on the day of his application for the benefit of the Insolvent laws hereinbefore mentioned and are yet unpaid.

Further complaining sheweth to your Honors your Orator that it is his duty for the benefit of the creditors of said Insolvent to make sale of all his property as speedily as may be to the end that the same may be distributed but that he cannot execute his trust in this behalf because of the embarrassments to the title of the property aforesaid caused by the Covinous and fraudulent dealings therewith of the said Insolvent hereinbefore mentioned.

In Tender consideration whereof and for as much as your Orator is remediless at the common law

To the end therefore that the said Charles Grover and Matthew Mc Colm may full true and perfect answers make upon their several corporal oaths to all and singular the premises and that as particularly as if thereto specially interrogated and that they may set forth the amount of money which had been paid by the said Charles on account of his purchase of the farm hereinbefore mentioned at the time of the conveyance thereof to the said Matthew and what was the arrangement then or there to fore or since made between them in respect to said farm and whether it was written or verbal and whether the consideration mentioned in the conveyance of his stock and utensils by the said Charles the said Matthew passed at the time of executing the same and that the said Charles may set forth the amount of his indebtedness and the amount of his property on the said 21st of April and 19th of July 1839 specifying the items under each head and that by this Honorable Court it may be adjudged ordered and decreed that the conveyances aforementioned of the 21st of April and 19th of July 1839 be annulled and avoided as fraudulent and the property therein mentioned sold for the benefit of the creditors of the said Charles Grover in the order in which they may prove to be entitled and that your Orator may have all such other and further relief in

the premises as his case demands.

May it please your Honors to grant to your Orator the writ of the State of Maryland of subpoena to the said Charles Grover and Matthew Mc Colm to be directed commanding them at a certain day and under a certain pain therein specified personally to be and appear before your Honors in this Honorable Court then and there to answer the premises and to stand to perform and abide by such order direction and decree therein as to your Honors shall seem meet &c.

Wm H. Tatchell Complts
T. Mason Campbell Solr

The State of Maryland To Charles Grover and Matthew Mc Colm (Seal) of Baltimore County Greeting We command and enjoin you that all excuses set aside you be in your person before the Judges of Baltimore County Court at the Court House in said County on the first day of June next to answer the Complaint of John Glenn against you in the said Court exhibited. Herein fail not as you will answer the contrary at your peril

Witness the Honorable Stevenson Archer Chief Judge of our said Court the first day of March in the year of our Lord one thousand Eight hundred and forty and Issued the 15th day of May 1841.

Jno. Hoff Clerk
Wm D. Ball Shff

Sum. & costs

The seperate Answer of Matthew Mc Colm to the bill of John Glenn against him and Charles Grover in Baltimore County Court as a Court of Equity exhibited

This respondent now and at all times hereafter saving and reserving to himself all and every manner of advantage and benefit of exception to the manifold errors imperfections and uncertainties in such bill of complaint contained for answer thereunto nevertheless or to such parts thereof as he is advised it is material and proper that he should answer unto says. That it is true as is set out in said bill of Complaint that on the Twentieth day of April Eighteen hundred and thirty nine this respondent received from John Scott Robert Purviance Junior Rebecca B. Carter and Charles Grover of the City of Baltimore a deed of conveyance comprising parts of various tracts of land in Baltimore County and containing together Three hundred and six Acres and quarter and thirty square perches of land more or less which deed was duly executed acknowledged and recorded and which he is prepared to produce to the Court here whenever the same may be required and that on the eighteenth day of July Eighteen hundred and thirty nine he received from Charles Grover a bill of sale or Conveyance for various articles of Stock farming utensils and implements used upon the land above mentioned which Bill of sale was likewise duly executed acknowledged and recorded and which also this respondent is ready to produce