the fraudulent grantor, a true and certified Copy of said fraudulent deed of Conveyance is here Exhibited marked Exhibit A No 4.

Your Orator further charges that the said R. J. Jamison at the time he made and Executed said Deed of Conveyance to his mother was not indebted to her, neither did she pay him any Consideration for said property, but that said deed of Conveyance was made with the express intent to cheat hinder delay and defraud Your Orators and other creditors out of their just debts claims suits judgments actions & demands and form other intent or purpose whatsoever. Your Orators further shew unto Your Orator that they are advised that the said R. J. Jamison pretends that at the time he made said deed of Conveyance to his mother he was indebted to her and that said absolute deed of Conveyance was made to his mother to secure her the money which he pretends he owed to her; but Your Orators charge that he did not owe his mother anything or any sum of money, but if in truth he did owe her any money at the time the said deed of Conveyance was made and executed said deed is utterly null and void under and by virtue of the provisions of the Insolvent Act of 1805 chapter 110 and the Supplements thereto. which Deed of Conveyance was given to the said R. Jamison the mother of said Insolvent debtor with intent thereby of the said R. J. Jamison to give an undue and improper preference to the said R. Jamison his mother if she in truth was a creditor which is utterly denied by Your Orators.

Your Orators charge and give Your Honor to understand that the said Robert J. Jamison for the purpose of Consummating his intended fraud upon Your Orators, and other his creditors did on the 23d day of June eighteen hundred and forty six while the suits of Your Orators aforesaid were pending in said County Court and but a short time before the rendition of said Judgment make application for the benefit of the Insolvent laws of 1805 and the several supplements thereto. and obtained a personal release from the Honorable Jacob Mathias one of the Judges of the Orphans Court of Carroll County which application was returned to the Carroll County Court and on the 23d day of June 1846 the said R. J. Jamison obtained a final discharge a true and certified Copy of said application and all the proceedings therein are here exhibited as a part of this Bill of Complaint & marked Exhibit No 5. Your Orators further shew unto Your Honor that the said R. J. Jamison at the time of his application for the benefit of the said Insolvent laws constituted and appointed one Thomas Barthalow his Trustee and by said Deed of Conveyance acknowledged before the said Jacob Mathias one of the Judges of the Orphans Court of Carroll County he conveyed all his property real personal and mixed of every nature and quality to wit which Deed of Trust is to be found in the record of the Insolvent proceedings Exhibited in this case and marked Exhibit A No 5.

Your Orators charge that the said Thomas Barthalow since his said appointment has died, who died without ever having discharged any of his duties as trustee and without ever taking charge of any of the property of said R. J. Jamison and selling and disposing of the same as directed and required by law. Your Honor is further informed that that the said R. J. Jamison at the time of the instituting the said suit by Your Orators in said Carroll County Court against the said R. J. Jamison was the owner and possessor of a valuable real and

and personal Estate and at the time he made application for the benefit of the Insolvent laws aforesaid he the said applicant returned upon his solemn Oath that he had no property; that he had before he made said application and after the institution of said actions by Your Orators disposed of or secreted and concealed all his personal property, thereby to cheat and defraud Your Orators and other of his creditors out of their just dues and claims. Your Orators further charge that the said Robert J. Jamison after he made the said fraudulent deed of Conveyance to his mother continued to use and occupy the said land and premises and all other his property in the same manner that he did before the said fraudulent Conveyance and transfer of said property and he is now in the possession use and occupation of said property. Your Orators further shew unto Your Honor that the said Rebecca Jamison the mother of the said Insolvent petitioner on the seventh day of May 1851 made and Executed a deed of Conveyance of the land and premises contained in the Deed of Conveyance of R. J. Jamison to his said mother Exhibited in this case marked Exhibit A No 4. back to the said R. J. Jamison for the pretended Consideration of One thousand five hundred dollars a true and certified Copy of said Deed of Conveyance from the said Rebecca Jamison to her said son is here exhibited marked Exhibit A No 6. that said last pretended Conveyance to Robert J. Jamison by his mother was a mere sham business and a continuation of the original fraud and deception. Your Orators further charge that the said Rebecca Jamison sometime in the last part of the year eighteen hundred and fifty six departed this life intestate leaving no property as it is believed and as Your Orators are informed and that no letters of administration have been taken out on her personal Estate; and if she had any property at the time of her death the said Robert J. Jamison being her principal distributee and heir at law and being in the possession of all she had has prevented it from being presented to the jurisdiction of the Orphans Court of said County all of which transactions of the said R. J. Jamison since the death of his mother in not accounting in any way for the fifteen hundred dollars the pretended sham consideration for said land is a continuation and an attempted final Consummation of the original fraud of the said R. J. Jamison to cheat and defraud Your Orators and other creditors. Your Orators further charge that they are advised that the deed of Conveyance of the said R. J. Jamison dated the ninth day of December 1845 conveying his property to his mother Rebecca Jamison is utterly null and void and that said property vested in the said Trustee Thomas Barthalow under and by virtue of the Insolvent laws of the said and as the said Thomas Barthalow the Trustee departed this life without having executed the trust reposed in him by virtue of said Deed of Trust it will be necessary to appoint a Trustee in his place and stead to execute said trust. Your Orators further shew unto Your Honor that the suits were instituted on the days charged and set forth in this Bill and that the Writs issued on said days and as evidence of that fact certified Copies of said Writs are here exhibited marked Exhibit A No 7, A No 8, A No 9. To the end therefore that the said Robert J. Jamison