may true direct and perfect answer make to all and singular the charges and matters stated and set forth in said bill of complaint as fully in every particular as if the same were here again repeated and he thereunto specially interrogated. May it please your Honor to ordain order and decree that the said Deed of Conveyance from the said Robert J. Jamison to his mother Rebecca Jamison exhibited in this case and marked exhibit A No. 4 be vacated annulled and made void and that a trustee be appointed in the place and stead of the said Thomas Parthalow to execute the trust heretofore reposed in the said Parthalow and to make sale of all the land and premises attempted to be conveyed to the said Rebecca Jamison in and by said deed which belonged to the said R. J. Jamison at the time of said fraudulent conveyance; and that your Orator may have all such other and further relief in the premises as the facts and charges and the nature of the case may require and as to your Honor may seem just and equitable. May it please your Honor to grant unto your Orator the State of Maryland writ of Subpoena to be directed to the said Robert J. Jamison thereby commanding him to be and appear before your Honor in this honorable Court on some day therein to be specified then and there to answer all and singular the matters and charges in this Bill of Complaint set forth and to abide such order and decree in the premises as to your Honor shall seem meet and as in duty bound &c. &c.

Jno. M. Palmer and
John E. Smith Solicitors
for Complainants

The Exhibit marked A No. 1. referred to in the foregoing Bill of Complaint is a follows to wit:

Exhibit A No. 1.

William Chestnut vs Robert J. Jamison Clemson Stevens } In the Circuit Court for Carroll County late Carroll County Court April Term 1846 case &c. 1846 September 12th Judgment against Jamison for $1000 Damages in the usual Costs to be released on the payment of $129.15 cts with interest from the 13th day of October 1845 and $8.33⅓ costs. And the further sum of $196.86 cts with interest from the 9th day of November 1845 and $8.45⅓ cents costs.

Same vs Same } In Same — case &c. 1846 September 12th Motion and order to consolidate with case above and Judgment.

State of Maryland Carroll County To wit. I hereby certify that the above is a true short copy of the (Two) Judgments (Consolidated) taken from record of proceedings of the Circuit Court for Carroll County (late Carroll County Court) in the above cases and I further certify that that there is no entry or other proceedings in said Court in said cases to show that the said Judgment or any part thereof hath been paid or satisfied.

(Seal) In Testimony whereof I hereto subscribe my name and affix the seal of the Circuit Court for Carroll County this 29th day of July Eighteen hundred and fifty two

Witness November 10th 1845 — Wm. B. Boyle Clk.

Exhibit A No. 2 Referred to in the foregoing Bill of Complaint is a follows

Exhibit A No. 2.

George Saunders vs Robert J. Jamison Clemson Stevens } In the Circuit Court for Carroll County, late Carroll County Court. Case &c. 1846 September 12th Judgment against Jamison for $1000. Damages in the usual costs. To be released on payment of $177.22 cts with interest from the 19th day of September 1845 and $8.25⅓ cents costs. and the further sum of $102.61 cents with the 9th day of November 1845 and $8.25⅓ cents costs.

Same vs Same } In Same — case &c. 1846 September 12th Motion and order to consolidate with case above and Judgment

State of Maryland Carroll County To wit.

I hereby certify that the above is a true short copy of (Two) Judgments (Consolidated) taken from the Record of proceedings of the Circuit Court for Carroll County (late Carroll County Court) in the above cases. And I further certify that there is no entry or other proceedings in said Court in said cases to show that the same or any part thereof hath been paid or satisfied. In testimony whereof I hereto subscribe my name and affix the seal of the Circuit Court for Carroll County this eighth day of July 1852.

(Seal)

Witnessed November 10th 1845.

Exhibit A No. 3 Referred to in the aforegoing Bill of Complaint is as follows to wit.

Exhibit A No. 3.

Samuel W. Gorsuch James L. B. Gorsuch Traders under the name & style & firm of L. W. Gorsuch and Son vs Robert J. Jamison Clemson Stevens } In the Circuit Court for Carroll County late Carroll County Court. September Term 1846 — Case &c. — 1846 September 12th Judgment against Jamison for $3000. Damages in the usual Cost, to be released on payment of $844.28 cts with Interest from the 8th day of April 1845 and $8.05⅓ cents Costs.

State of Maryland Carroll County. To wit.

I hereby certify that the above is a true short Copy of the Judgment taken from the record of proceedings of the Circuit Court for Carroll County (late Carroll County Court) in the above case and I further certify that there is no entry or other proceedings in said Court in said case to show that the said Judgment or any part thereof hath been paid or satisfied.

(Seal) In testimony whereof I hereto subscribe my name and affix the seal of the Circuit Court for Carroll County this eighth day of July eighteen hundred and fifty two.

Witnessed August 22 1846. Wm. B. Boyle Clk

Exhibit A No. 4. Referred to in the foregoing Bill of Complaint is as follows to wit.

Exhibit A No. 4.

Robert J. Jamison Deed to Rebecca Jamison } This Indenture made this ninth day of December in the year of our Lord One thousand Eight hundred and fifty five between Robert J. Jamison of Carroll County in the State of Maryland of the one part and Rebecca Jamison of the County and State aforesaid of the other part. Witnesseth that the said Robert J. Jamison for and in consideration of the sum of Fourteen hundred dollars lawful money of the United States to the party hereto of the first part paid by the party of the second part to these presents at or before the sealing and delivery (hereof)