in the year Eighteen hundred and forty four with intent to hinder delay and defraud her said creditors in the payment of their said debts and to shield her said estate against liability for the payment of the said debts and others which she might thereafter contract execute and deliver unto a certain Nathaniel Williams and Joseph B. Williams of the City of Baltimore a deed of trust conveying to them all the property and estate right to and credits of and belonging to the said Hannah K. Chase wherever the same might be in trust for the purpose of permitting the said Hannah K. Chase to receive the rents issues and profits and income thereof during her natural life and after her death in trust for the several and same uses and trusts and under and subject to the powers limitations restrictions and conditions mentioned in the last will and testament of the said Hannah K. Chase to the trustees therein named and in and by codicils by her made to said will which will bears date on the tenth day of November eighteen hundred and thirty six and the first codicil thereto bears date the 9th day of June 1841 the second codicil bears date the 30th day of April 1842 and the third codicil bears date on the 23 day of May 1844 all of which will more fully appear by reference to a certified copy of said deed of trust herewith filed marked "Complainants Exhibit A." and prayed to be taken as a part of this their Bill of Complaint.

Your Orators further charge that after the execution of the said deed of trust the said Hannah K. Chase made and published two other codicils to her said last will and testament one dated on the 13th day of September 1845 and the other dated on the fourteenth day of August 1846 and that under and by the provisions of the said last will and codicils all of the property and estate of the said Hannah Kitty Chase which was conveyed by the said deed of trust aforesaid to Nathaniel Williams and Joseph B. Williams is devised bequeathed and limited to and for the uses of Mary Parney the daughter of the said testatrix and William Chase Parney, Samuel Chase Parney, Francis Henry the wife of William Steele Ann the wife of Franklin Steele, Caroline the wife of George Harrington Catharine C. Olfield Mary Rogers the wife of Wm. H. Rogers. Maria Munroe the wife of Postell and Clayonie Parney grand children of the said Hannah Kitty Chase and their representatives and the said Nathaniel Williams and Joseph B. Williams are constituted and appointed trustees in said last will and codicils and executors thereof all of which will more fully appear by reference to a certified copy of said last will and testament and the codicils thereto herewith filed marked "Complainants Exhibit B." and prayed to be taken as a part of this bill of complaint. Your Orators further charge that after the execution of the aforesaid deed of trust the said Hannah Kitty Chase continued to exercise all the rights and powers of ownership over said property and on the ninth day of August in the year Eighteen hundred and forty four only seven days after the execution of the said deed of trust executed by a certain John

Morris of a deed of mortgage of a part of said property embraced in said deed of trust to secure to the said Morris the payment of the sum of two thousand two hundred and fifty dollars loaned by him to the said Hannah K. Chase. Your Orators further charge that after the execution of the aforesaid deed of trust the said Hannah Kitty Chase contracted debts to a very large amount as maker and acceptor and endorser of various promissory notes amounting as your orators are informed and believe to be over twelve thousand dollars having no property except that embraced in the aforesaid deed of trust for the payment of the same and that the said Hannah K. Chase departed this life during the early part of this year 2d March 1848 leaving said debts unpaid and that letters testamentary under her last will have been duly granted by the Orphans Court of Baltimore County to the aforesaid Nathaniel Williams and Joseph B. Williams the executors therein named as by reference to a certified copy thereof hereunto filed marked "Exhibit C" will appear who have no assets belonging to the estate of the said Hannah K. Chase except the property embraced in the aforesaid deed of trust and who refused to pay the aforesaid debts or any part thereof out of the said property. Your Orators further complaining charge that the said deed of trust is fraudulent and void as against the creditors of the said Hannah who were such at and before the execution of the aforesaid deed of trust as also against all the subsequent creditors of the said Hannah K. Chase; that the said deed of trust was designed to take from the said Hannah Kitty Chase the legal title to her property and thus protected from the claims of her creditors and at the same time to give her the power of contracting and disposing of the said property by last will and testament free from the claims of her said creditors. And your Orators further charge that according the validity of the said deed of trust for the purpose last aforesaid still that your orators and the other creditors of the said Hannah K. Chase are entitled to be paid their debts out of the said property the deed operating in connection with the aforesaid last will and its codicils as they are advised and humbly insist as a disposition of the said property of the said Hannah K. Chase by last will and testament and therefore liable to the payment of her debts and your Orators charge that the personal estate in the hands of the said Trustees is insufficient for the payment of the said debts and they are advised and insist that the personal estate of the said Hannah in the hands of the said Trustees ought to be applied to the payment of the debts of the said Hannah so far as it will extend and that any deficiency in the said personal estate ought to be supplied by a sale of the real estate of the said Hannah in the hands of the aforesaid Trustees. Your Orators further charge that neither the said Mary Parney William Chase Parney, Samuel C. Parney, Catharine C. Olfield, Mary Rogers, and William H. Rogers her husband Francis H. Steele and William P. Steele her husband Ann Steele and Franklin Steele her husband George Harrington and Caroline his wife Maria Munroe Postell