all of whom are infants under the age of twenty one years, are entitled to the said lands be reason of such alleged forfeiture and that the legal Estate is outstanding in a certain Job Smith in trust for their use under some pretended deed, and at other times pretending some other excuse for his said violent, unlawful and inequitable conduct in the premises, all of which pretences and excuses your Orators and Oratrixes aver are false and without foundation in law and equity; And your Orators and Oratrixes charge that the said Julius Peter Pfeltz is utterly insolvent. In tender consideration whereof and for as much as your Orators and Oratrixes are remediless at law and can only have relief in Equity, and to the end that the said Julius Peter Pfeltz, Charles William Pfeltz, Gustavus Pfeltz, Albertina Pfeltz, Catharine Pfeltz, Martha Pfeltz and Ann Maria Pfeltz and the said Job Smith may answer this Bill (the Infants by a guardian for that purpose to be appointed by this Court) and every matter herein and that the said Julius Peter Pfeltz may by Decree of this Court be compelled to surrender and yield up the said Lands and premises unto your Orators and Oratrixes as their former Estate and to account to Job Smith, your Orators and Oratrixes for the rents and profits thereof whilst so held by him and pay over the same to your Orators and Oratrixes for their avoiding and benefit according to the terms of the said Will of the said George C. Pfeltz deceased and that the title of your Orators and Oratrixes may be declared and quieted and that pendente lite a Receiver may be appointed by your Honor of the said rents and profits and that the said Julius Peter Pfeltz may be enjoined and compelled to surrender up the said premises to the said Receiver when so appointed and that your Orators and Oratrixes may have such other and further relief in the premises as the nature and circumstances of their case may require &c. May it please your Honor to grant unto your Orators and Oratrixes the State of Maryland Writs of Subpoena to be directed to the said Julius Peter Pfeltz, Charles William Pfeltz, Gustavus Pfeltz, Albertina Pfeltz, Catharine Pfeltz, Martha Pfeltz and Ann Maria Pfeltz all of Baltimore County and Job Smith of Baltimore City commanding them to appear and answer &c. And as in duty bound your Orators and Oratrixes will ever pray &c.

J. Parkin Scott
Sol. for Complts

Baltimore City, Sct. on this 21st day of October 1857 before the Subscriber a Justice of the Peace of the State of Maryland in and for the City aforesaid personally appeared the above named Sarah Pfeltz and made oath on the Holy Evangels of Almighty God that the matters and facts above stated are true as therein stated.

Sworn before me Samuel Norris.

The Exhibit marked No. 1 and No. 2 referred to in the foregoing Bill of Complaint are as follows, to wit;

"Complainants Ex. No. 1."

State of Maryland Stamp one Dol.

This Indenture made this twenty sixth day of June in the year of Our Lord one thousand Eight hundred and forty seven between Joseph G. Speed of the City of Baltimore in the State of Maryland of the first part and George C. Pfeltz of Baltimore County in the said State of the second part, Whereas by a decree of the High Court of Chancery passed on the Eleventh day of July in the year Eighteen hundred and forty six in a case in said Court pending in which Ann M. Pfeltz and the said George C. Pfeltz were complainants and Peter Pfeltz and others were defendants the said Speed was appointed Trustee to make sale of the land and property hereinafter described; and whereas the said Speed after having bailed and duly advertised said property as required by said decree sold the same to the said George C. Pfeltz and his report thereof to the Chancellor was duly ratified and the said George C. Pfeltz has fully paid for the said land and is entitled by the terms of said decree to his deed. Now this Indenture Witnesseth that for and in consideration of the sum of Ten Hundred and Seventy five dollars to the party hereto of the first part paid by the party of the second part to these presents at & before the sealing and delivery hereof the receipt whereof is hereby acknowledged, the said Joseph G. Speed trustee as aforesaid has given granted bargained and sold aliened enfeoffed and conveyed and by these presents doth give grant bargain and sell alien enfeoff and convey unto the said George C. Pfeltz his heirs and assigns all that piece or tract of land situate in Baltimore County near the Head of Bear Creek containing about one hundred and twenty one acres of land which is mentioned in the proceedings in said cause in Chancery and reported by the said Trustee as having been sold by him to the said George C. Pfeltz and which tract of land was conveyed by John S. Tyson and others to William Pfeltz by Deed dated the Eighth day of April 1838 recorded among the Land Records of Baltimore County in Liber W. G. No 194 folio 506 &c and is there estimated to contain 120 acres more or less; and is fully described therein by metes &c beginning at a bounded White Oak standing at the end of thirty hundred and six perches and one quarter of a perch on the second line of the whole tract called the Hoope and so as following the boundaries as they are laid down & expressed in said deed, and which tract of land is named and called "Leg Weary" Together with all and singular the buildings and improvements thereupon erected made or being, and all and every the rights privileges, advantages and appurtenances to the land belonging or in anywise appertaining and the reversion and