Complainant in said proceedings and bear his proportionate share of the expense. He also represents unto your Honors that he is a creditor of the said Hannah upon a Bond for the sum of Eleven Hundred dollars which is filed among certain proceedings in the Equity side of this Court in the case of Patterson against Talbott Trustees. He prays that he may have leave to withdraw said Bond and file in the proceedings in this case, And he will ever pray

J. Malcolm Jr Kelly

John C. LeGrand

Leave granted as prayed.

19 Mar 1859

N.B. The Note above referred to is missing

W. H. H. TOAST clk

In the Baltimore County Court

In Equity

Daniel B. Banks and John Stewart and others

vs

Nathaniel Williams, Joseph B. Williams Mary Barney William Chase Barney Samuel Chase Barney William Hood and Frances H. Hood his wife Jane Ann Hood and Ann Hood his wife William H. Rogers and Mary Rogers his wife George Harrington and Caroline Harrington his wife William Ross Posted and Mona M. Posted his wife Elayene Barney and Catharine C. Clapsed

The object of the Bill and amended Bill filed in this case is to procure a decree to be passed and have declared null and void an alleged deed of trust from Hannah Kelly Chase to Nathaniel Williams and Joseph B. Williams of the City of Baltimore dated the 7th day of August 1844. The Bill states that the said Hannah K. Chase in the year 1844 being largely indebted to the Complainants Daniel B. Banks and John Stewart executed an alleged deed of trust to Nathaniel Williams and Joseph B. Williams in trust for the said Hannah K. Chase of her real and personal estate of great value, and with an intent to hinder and delay the Creditors of the said Hannah and to shield her estate from the payment of said debts and other creditors to whom she might have been indebted, and to allow the said Hannah to receive rents issues and profits during her life and after her death to the uses and limitations of her last will and testament and the Codicils annexed. That after the execution of said alleged deed of trust the said Hannah published her other Codicils to her last will and testament by which she devised and bequeathed and limited all said property to and for the uses of the defendants Mary Barney William Chase Barney Samuel C. Barney Frances Henry Chase of Franklin State

Caroline the wife of George Harrington Catharine C. Clapsed Mary Rogers the wife of William H. Rogers Mona Thurrod the wife of William Ross Posted and Elayene Barney (the child and grand children of the said Hannah) and their representatives, and that Nathaniel Williams and Joseph B. Williams are constituted the executors of said last will and testament and Codicils. That after the execution of the said alleged deed of trust, the said Hannah continued to exercise all the right and powers of ownership over said property and on the 9th day of August A.D. 1844 executed a certain John B. Morris a deed of Mortgage upon part of said property to secure the sum of two thousand five hundred dollars. That after the execution of the aforesaid alleged deed of trust, the said Hannah became liable as maker and endorser of promissory Notes, amounting to the sum of three thousand dollars leaving no property to pay the same, and that the said Hannah departed this life in the year 1848 leaving said debts unpaid and that letters testamentary under her last will had been duly granted and issued by the Orphans Court of Baltimore County to Nathaniel Williams and Joseph B. Williams, the Executors. That said alleged deed of trust is fraudulent and void as against the Creditors of the said Hannah, at and before the execution thereof as above against all the subsequent Creditors, and that said alleged deed of trust was designed to take the from the said Hannah the legal title of property, and thus forbid her property from the claims of their Creditors and at the same time to give her the power of controlling and disposing of it by said will and testament free from the claims of her creditors, and that according the said alleged deed of trust to be read for that purpose, shew that the Complainants and others in the cases are entitled to have their claims paid out of said property and that said alleged deed of trust operating in connection with the said last will and testament and Codicils operate as a disposition of said property by said will and testament and is therefore liable to the payment of the debts due by the said Hannah. That the personal Estate of the said Hannah in the hands of the said trustees is insufficient to pay said debts that said personal Estate should be applied as far as will extend to the payments of said debts and that any deficiency ought to be supplied by a sale of the real Estate of the said Hannah covered by the alleged deed of trust. That all the debtors aforesaid resident of the State of Maryland and that the Trustees under said alleged deed of trust and Executors refused to pay the said claims and that they cannot obtain relief. And pray that the defendants may answer the Bill, and the said alleged deed of trust may be declared fraudulent & void, and that the Complainants and other Creditors of said Hannah may be paid their claims and that a decree may pass for the sale of