Court of Equity The Bill of Complaint of John Reybold William Reybold Pamey Reybold Anthony Reybold and John C Clark of New Castle County in the State of Delaware Humbly shewe that heretofore to wit, on the 22 day of February in the year 1854 a certain John W Hudson of Kent County in the State of Maryland was indebted to your Orators namely John Reybold William Reybold Pamey Reybold and Anthony Reybold in the sum of of five thousand three hundred and seventy one dollars current money and intending to secure the payment thereof unto your said named Orators did by his deed of that date in which his wife Aramenta Hudson united convey unto your said first four named Orators their heirs and assigns certain Real Estate lying in Kent County aforesaid and particularly described in said deed to which said deed there is a condition annexed that it be void by payment of the said John W Hudson to your said first four named Orators their Executors administrators or assigns of the aforesaid sum of Money with the interest thereon from the first day of January in the year 1853 in manner following that is to say the sum of one hundred and seven hundred and ninety dollars and thirty seven and a third cents part thereof on or before the 1st day of January in the year 1857 and interest on the whole sum as aforesaid semi annually on the first day of July and January in each year. the further sum of one thousand seven hundred and ninety dollars and thirty seven and a third cents, other part thereof with legal interest semi annually on the whole sum left or unpaid on or before the first day of January in the year 1859 and the further sum of one thousand seven hundred and ninety dollars and thirty seven cents and a third the residue thereof with the legal interest thereon semi annually on or before the first day of January 1860 and one as by the said original Deed duly executed acknowledged and recorded and hereunto filed as a part of this Bill more fully appears Yet the said October 20,

And your Orators charge that on the 5 day of February in the year 1856 the said John Reybold William Reybold Pamey Reybold and Anthony Reybold four of your Orators did by their deed of that date duly executed acknowledged and recorded among the land Records of Kent County aforesaid grant convey assign transfer and set over all the said lands and premises mentioned and contained in the said Deed of Mortgage and the said Debt and interest thereon intended to be secured by the said Deed of Mortgage to John C Clark one of your Orators as Trustee in trust for the said John C Clark and William Reybold Trustees for the Children of Philip Reybold Junior deceased, as by the said original deed of assignment and conveyance hereunto filed as a part of this Bill will appear Yet the said

And your Orators further charge that by the instalments of principal Debt mentioned in said Deed of Mortgage have become due and considerable interest on the whole said sum mentioned in the Deed of Mortgage and that there was due to your Orators John C Clark and William Reybold Trustees as aforesaid and assigns on the first day of January last after allowing credits for all payments made by the said John W Hudson and still remains due and unpaid the sum of two thousand seven hundred and seventy four dollars and 96 cents as by a statement or account hereunto filed, marked Exhibit C and prayed to be taken as a part of this Bill will appear and the payment has been duly demanded of the said John W Hudson and that the said Aramah Hudson is since deceased,

To the End therefore that the said John W Hudson may answer the several matters and things hereinbefore stated and fully and particularly as if they were herein again recited and be was thereunto specially interrogated and that the sum and premises aforesaid or so much thereof as may be necessary may be sold for payment of your Orators claim or that Decree that is due and interest aforesaid and that your Orators may have such further and