dollars

4 That your orators Charlotte Withers, Charlotte A. Withers, Susan Withers and your orator Edwin D. Withers, being indebted as aforesaid and your orators Charlotte A. Susan, and Sophia and your orators Edwin D. and Michael P. C. being seized of said real estate subject to the life estate of their mother the said Charlotte Withers, and being anxious to pay and satisfy said debts and with a view to the partition of said real estate, and with a view of saving for their mother during her life a part of said real estate which is known as the Home farm containing about one hundred and fifty acres were advised that the best mode by which to effect said purposes, would be for your orators and all interested in said land, to execute a deed of trust of the same to some person whose intelligence would enable them to perform the duties of Trustee and in whose integrity and discretion they could confide.

That they were advised that Adam Denmead was such a person as they desired to find and one in whose discretion prudence and integrity they might place unlimited confidence therefore your orators Edwin D. Withers applied to said Adam Denmead, in behalf of himself and your orators and oratrixes and requested that he would accept said trust.

That the said Michael P. C. Withers and Lucinda his wife do not reside in the State of Maryland but that they is a resident of the State of Maine.

5 That being strongly impressed with the belief that the services of said Denmead in said Trust would be very valuable to them that is to say your oratrixes Charlotte Withers, Charlotte A. Withers, and Susan Withers and your orator Edwin Withers together with said Michael P. C. Withers contracted with said Adam Denmead in writing to pay him over and above Commissions the sum of twenty five hundred dollars for accepting executing the said trust, upon which Contract the said Denmead agreed to accept the said trust.

6 That in pursuance of said Contract your oratrixes Charlotte Withers, Charlotte A. Withers and Susan Withers and your orator Edwin D. Withers by deed dated the thirteenth day of October eighteen hundred and sixty and recorded among the land records of Baltimore County in Liber G. H. C. No 30 Folio 506 conveyed all their right, title, and interest in and to all the said real estate aforesaid. In Trust and Confidence nevertheless that the said Adam Denmead would sell and dispose of said real estate at public or private sale, in such manner and on such terms as he might deem most expedient the estate and interest of said grantors in the land and premises thereby conveyed an office copy of which deed is hereunto filed marked Complainants Exhibit A. which they pray may be taken as a part of this their bill of Complaint

7 That by deed dated the Sixth day of November in the year eighteen hundred and sixty and recorded among the land Records of Baltimore County in Liber G. H. C. No 31 Fol 290 &c the said Michael P. C. Withers

and Lucinda L. B. Withers of Bangor in the State of Maine conveyed to said Adam Denmead all their right title and interest in and to said real estate for the purposes therein mentioned a copy of which is hereunto filed marked Complainants Exhibit B which they pray may be taken as a part of this their bill of Complaint,

8 That by deed dated the 20th day of February 1861 and recorded among the Land Records of Baltimore County in Liber G. H. C. No 32 Fol. 27 &c the said Christian Ehrman and Sophia his wife conveyed their interest in said real estate to said Adam Denmead for the purposes therein mentioned a copy of which is hereunto filed marked Complainants Exhibit C. which they pray may be taken as a part of this their bill of Complaint

9 That soon after the execution of said deed of which Exhibit A. is a copy, the said Adam Denmead purchased the Mortgage debt aforesaid and several of said Judgments, and procured the same to be assigned to him, but as the terms of the purchase your orators are not informed.

10 That notwithstanding civil war has been raging in the country from the early part of the year 1861 and the effect it has had in depreciating the price of all property, real and personal, particularly in the State of Maryland. and more particularly about the months of September and October in the year 1861, when it was impossible to tell on what day the State of Maryland might become the battle ground for the contending armies and regardless of the fact that the legislature of Maryland, with the view of preventing the property of honest debtors from being sold at such sacrifice, as would not only bankrupt individuals but ruin and beggar whole families enacted the act of 1861 ch 17 by which the gave a stay of execution on all judgments and decrees for twelve months from the date thereof, namely the 10th day of May 1861 the said Adam Denmead, gave notice that as such trustee, he would sell at the exchange sales Rooms in the City of Baltimore on the Twenty second of October eighteen hundred and sixty one, ten lots of the said real estate containing twelve hundred acres; among which was the lot on which your oratrixes Charlotte Withers, Charlotte Withers, Susan Withers and your orator Edwin D. Withers resided.

11 That the said Adam Denmead, continued to advertise as aforesaid although your orator Edwin D. Withers on behalf of himself and the Complainants aforesaid. protested against said sale and urged that to sell at the time and under the circumstances would be ruinous to those whose estates was to be sold, and on the day aforesaid, at the place aforesaid the said Denmead proceeded to sell said real estate and sold five lots thereof for upwards of fourteen thousand dollars being every