the interest thereon Semi-annually, the said Vickers, did by deed of Mortgage of that date grant, bargain & sell to your orator, all his right, title and interest as legatee under the will of the late Jesse Vickers, the father of said Mortgagor in & to a certain lot of ground situate on the east side of Caroline Street in said City & described in said deed of Mortgage. Also all the household furniture of every kind and nature whatsoever, bed steads, bedding, carpeting & chairs &c contained in the house No 69 Caroline Street & also all the bar fixtures, bar, counter decanters, looking-glasses, & all the other furniture & fixtures &c in and about the premises - No. 164 East Baltimore Street, nat the North East Corner of Baltimore & Eden Streets mentioned in a bill of sale from Jane Sutton to said Jesse Vickers which said deed of Mortgage & a certified copy of said Bill of Sale herewith filed marked Exhibits A & B, is part of this Bill of Complaint - And your Orator further shows, that afterwards to wit, on the 11th day of July A.D. 1860 a certain Thomas H. Griffin, Executor of the last will of Jesse Vickers deceased, by virtue of an order of the Orphans Court for Baltimore City sold the Household property mentioned in said deed of Mortgage at Public sale to the said Jesse Vickers for the sum of $425 -, That afterwards to wit, on the 20th day of February A.D. 1861. the said Jesse Vickers having paid to the said Griffin as Executor the entire amount of the purchase money aforesaid, with the fraudulent intent of depriving your orator of her lien on said property as security for her said claim with a view to delay, hinder and defraud your orator and his other creditors, in the payment of their just dues & for the purpose & with the fraudulent intention of secretly applying the same to his own use, caused a deed of Assignment of said property to be made by the said Griffin as Executor to a certain Amanda E. Vickers & the wife of said Jesse Vickers, a copy of which deed is herewith filed marked Exhibit C. as part of this Bill. And your orator further shows, that the said Jesse Vickers, with the intention of depriving her of all security for her said debt, is at this time, by Samuel H. Gover, the Auctioneer, advertising the chattel property mentioned in said Mortgage to be sold on the twentieth instant & intending as your orator charges and alleges to convert and appropriate, to his own use the proceeds of the sale of said property a copy of which advertisement marked Exhibit D. is herewith filed. And your orator further charges and alleges that the deed to the said Amanda E. Vickers was made without any consideration having been paid by her, & that the whole amount of said consideration was paid by the said Jesse Vickers & that the said deed is covinous and fraudulent & ought to be set aside & vacated and the said property sold for the satisfaction of her said claim.

And your orator further shows, That she has serious apprehensions that the said Jesse Vickers & wife may endeavor to make

sale of said property on Caroline Street described in the deed from Thomas H. Griffin Exr. to the said Amanda E. Vickers & unless prevented from so doing, inasmuch as she has no other property save as mentioned in said deed of Mortgage will subject your orator to serious loss and that unless the said Jesse Vickers is prohibited from selling the goods and chattels as mentioned in said advertisement, her security will be greatly diminished and she will suffer irreparable loss and damage. And your orator admits that she has received from the said Jesse Vickers the sum of forty dollars on account of said principal note, & also the first six months interest thereon, but she charges & alleges, that the sum of one hundred & sixty dollars, with interest thereon from the 25th day of October 1860 is still owing under said Mortgage. And your orator further shows that she has no adequate remedy at law, and can only have relief on account of Equity. Be consideration whereof and to the end that the said Jesse Vickers and Amanda E. Vickers, his wife, may answer the several matters and things hereinbefore charged as fully and particularly as if they were herein stated, and they were thereto specially interrogated, and that the said deed of Assignment to said Amanda E. Vickers may be declared covinous and fraudulent and may be vacated and set aside as void and of no effect as against your orator and that said property may be decreed to be sold for the satisfaction & payment of her said claim after it shall become due and payable and that a receiver may be appointed to take charge of all the goods and chattels mentioned in said deed of Mortgage and to preserve and dispose of the same under the direction of this Court. And that the said Jesse and Amanda E. Vickers his wife be restrained from selling, or in any manner disposing of said property on Caroline Street & from offering to sell the same, & that the said Jesse Vickers may be restrained and prohibited from selling the property mentioned in said advertisement by Samuel H. Gover, an auctioneer & that your orator may have such other and further relief as her case may require &c. May it please your Honor to grant unto your orator the State of Maryland's writ of Injunction against the said Jesse Vickers & Amanda E. Vickers his wife, enjoining and strictly prohibiting them from selling, or in any manner disposing of, or offering, or attempting to sell or dispose of the said lot of ground & improvements on the east side of Caroline Street described in the deed of the 20th of February A.D. 1861 from Thomas H. Griffin to the said Amanda E. Vickers & also commanding & enjoining the said Jesse Vickers, his agents & attorneys, to refrain from selling the goods and chattels mentioned ~~mentioned~~ in said mortgage & and in said advertisement of Samuel H. Gover, Auctioneer; and also the writ of