Men and each of them was Executed fraudulently and without Consideration for the purpose of hindering delaying and defrauding Your Orator and others the Creditors of the said Cunningham and obstructing their just and lawful suits and actions at a time when the said Cunningham was not only as aforesaid utterly insolvent but had been sued and was that still further to be sued for debts which he was not then able to pay and from never has paid, Wherefore your Orator charges that the said deeds were and are and each of them was and is utterly fraudulent void and void and ought by your Honor so to be declared And your Orator further represents that on or about the 14th day of January 1856 he sought suit against the said Cunningham in the Superior Court of Baltimore City and on the 10 day of December 1857 recovered judgment by default against the said Cunningham which was extended by said Court on the 7th day of October 1857 for the sum of $3488.50 with interest from said last mentioned date and costs being for the remainder of certain debts paid only of the indebtedness aforesaid of the said Cunningham to your Orator and not embracing the residue thereof which was upon open account, And your Orator files herewith a short Copy of said judgment marked C to which he refers And your Orator charges that the said Abigail Cunningham departed this life during the Summer of October of 1857 and letters of administration upon her Estate were granted by the Orphans Court of Baltimore City to the said Thomas A Cunningham who duly qualified as such administrator but returned no inventory and afterwards on or about the 10 day of April 1858 attorney of the said Abigail was revoked and power in the said Orphans Court dated July 7 1855 before the execution of the Conveyances aforesaid thereby made and constituted and appointed the said Thomas her Executor who hath since duly qualified as such as will appear by an exemplification of the letters testamentary herewith filed marked "D" And your Orator represents that by the said last Will and Testament the said Abigail Cunningham interest with premises aforementioned passes under the residuary clause (if at all) to her daughter Susan Jane Abbie Cunningham who hath since intermarried with John H Wright as by a reference to a certified Copy herewith filed marked E will appear And your Orator further charges that a certain Edward Mitchell and Joseph Edmondson on the 2 day of March 1856 did recover judgment against the said Cunningham in the Common Pleas of Baltimore City in two several suits in the one for $261.46 interest and costs and in the other for $264.03 interest and costs And a certain Robert Carroll on the 10th of September 1856 did recover judgment by default against the said Cunningham in the Superior Court of Baltimore City which on the 7 day of May 1858 was extended for the sum of $1184.40 interest and costs And a certain Samuel B Sexton on the 7 day of October 1856 did recover judgment in the said Superior Court aforesaid against said Cunningham for the sum of $1132.33 interest and costs, And your Orator further represents that your Orator and all of the judgment Creditors aforementioned of said Cunningham have caused Writs of fieri facias to be issued on their said judgments in the Orders following that is to say The said Sexton on the 25th of March 1858 the said Mitchell and Edmondson on each of their said judgments upon May 29th 1857 Your Orator on the 18 day of July 1858 and the said Carroll on the 22d day of May 1859 And your Orator further charges that on or about the 28 day of July 1854 prior to the Conveyances aforesaid

the said Cunningham by Mortgage duly executed and recorded did convey and hypothecate of the property set forth in the deed aforesaid marked A unto Doctor James Hall of the City of Baltimore to secure the payment to said Hall of the sum of $[illegible] with interest Nevertheless your Orator further represents that the Writs of fieri facias aforesaid are all in the hands of Thomas Cramer the Sheriff of Baltimore City and have been levied upon the property aforesaid and the said Sheriff hath advertised the same for sale, under the executions aforesaid of said Sexton and Edmondson and Mitchell, as will appear by his advertisement herewith filed marked F and the said sale and Ca Sa filed on the 31 of August instant unless your Honor shall restrain the same, But your Orator represents to your Honor that although the said property is fraudulently attempted to be disposed of by the Cunningham is as your Orator charges of large value sufficient of justly and fairly disposed of to cover almost entirely of not fully the liens thereupon herein before recited yet from the fact that the title thereunto is so variously entangled and clouded as your Orator has set forth and from the artificial and confused necessarily growing out of the number, character and complication of the liens and incumbrances thereupon which your Orator has detailed it will be impossible for the said property to be sold by the Sheriff except at a great sacrifice imposing upon the junior incumbrances the necessity of bidding in the same at the sale under the senior Executions, or incurring the total loss of their just Claims notwithstanding the sufficiency of the property to satisfy the same And your Orator further represents that the questions of priority among the said incumbrances themselves growing out of the dates and character of their several judgments the respective dates of their executions issued and such as exist, also and additional necessity for your Honors interposition, not merely for the determination of their respective but for the marshalling of their respective securities the different qualities of the said property and the existence of the Mortgage Claim of said Hall as recited rendering the administration of justice and Equity as between the said Creditors in connection with the other facts referred to therein impossible To the end therefore that your Orator may have relief in the premises and that the said fraudulent and pretended Conveyances may be by your Honor declared void and that the property thereby attempted to be fraudulently Conveyed may be sold by a Trustee to your Honor to be appointed and that the proceeds of such sale may be brought into Court to be administered and distributed as your Honor may direct and that your Honor may be pleased to determine the respective liens incumbrances and priorities of your Orator and all other the lien Creditors hereinbefore mentioned and may marshall their respective securities and adjudicate between them all questions and claims of right in the premises, And to the further end that the said Thomas Cramer Sheriff of Baltimore City aforesaid may be enjoined and restrained from the further execution of the said writs of fieri facias in his hands as aforesaid upon any the property by him heretofore seized taken or levied upon as the property of said Thomas A Cunningham and that the said Samuel B Sexton Edward Mitchell and Joseph Edmondson James Hall and Robert Carroll may be restrained and enjoined from further prosecution of their said Writs upon the said property now heretofore seized and taken by said Sheriff thereunder and from proceeding against said Hall to foreclose his Mortgage (Your Orator instructs and consenting so to be enjoined likewise for the security of said Defendants) And that your Orator