Estate thereon and your Orators Harriet and Louisa were seized of the remainder in fee simple, All they further shew that your Orator Edmund Gibson was bound for Will on or about the 5 day of September 1845 indebted unto a certain John Patterson deceased in a small sum of money the amount whereof your Orator and Orators are unable to state with any degree of accuracy and that in order to secure the payment thereof your Orator together with his Wife your Orator Mary Gibson on or about the said 5 day of September 1845 executed a Mortgage and delivered to said John Patterson a deed of Assignment of the two Ground Rents on Cumberland Street above mentioned for the term of five years to secure an alleged indebtedness of twelve hundred dollars, but your Orator and Orators deny the said indebtedness, as by the said deed recorded in Liber AWB No 357 folio 488 &c will appear, And your Orator and your Orators charge that the said sum of twelve hundred dollars was made up of some small sums of money actually due by your Orator to said John Patterson the amount of which they do not know together with several very heavy charges for usurious interest upon so the money as due by your Orator, And they further shew that afterwards to Wit on or about the 23 day of October 1850 your Orator was indebted unto the said John Patterson, in sundry other small sums, the exact amount of which they do not know, and that to secure the same with other usurious interest and charges thereon. Your Orator Edmund Gibson and your Orator Mary Gibson made and delivered to the said John Patterson another deed which purports to be to secure the payment of two thousand and twenty six dollars and which included the loans first above mentioned whereby they conveyed to him the House and Lot on Lexington Street aforesaid To Hold the same for the term of six years and two months as by the said deed recorded in Liber AWB No 440 folio 395 &c will appear. And they further shew that afterwards to Wit on or about the 24 of March 1854 your Orator having in the meantime borrowed some other small sums of money from said John Patterson, the amount of which your Orator and Orators do not know, your Orator Edmund and your Orator Mary executed a Mortgage and delivered to said John Patterson another deed of said property which purports to be to secure the sum of thirty five hundred and thirty dollars the greater part of which amount is made up of the previous loans above mentioned and of various and heavy usurious charges as by said deed recorded in Liber E D No 55 folio 248 &c will appear. And that on the 7 day of March in the year last aforesaid your Orators Harriet Gibson and Louisa Gibson executed a Mortgage and delivered to the said John Patterson a deed of the Interest and Estate in the same property, recalling the deed last aforesaid and assigning the same as additional security for the same purposes, as by the said deed recorded in Liber E D No 55 folio 487 &c will appear, And your Orator and Orators further shew that on the 30 day of August 1854 they united in another deed to said John Patterson of the same property to secure the payment of the same debt with usurious interest thereon still further augmented by additional usurious charges thereon as by the said deed recorded in Liber E D No 67 folio 99 &c will appear, And they further shew that afterwards to Wit on the twenty fourth day of November 1854 the said John Patterson made a pretended account against your Orator in which was many charges of usurious interest and which he made it to appear that your Orator then owed the sum of fifteen hundred

dollars (which did not your Orator utterly deny) and that the said John Patterson then advanced another small sum of money to your Orator the amount of which they do not exactly know, and charged your Orator with forty eight hundred dollars which the said John Patterson did not advance for do your Orator received the said amount and to the said John Patterson then induced and persuaded your Orator and your Orators to execute a Mortgage and deliver to him another deed of all the said property to hold for the term of twenty one years as alleged for payment of said usurious loans and charges, as by said deed recorded in Liber E D No 72 folio 419 &c will appear. And your Orator and Orators further shew that afterwards to Wit on the 24th day of April 1855 the said John Patterson pretending that he had made further loan and advance to your Orator of twenty four hundred and forty dollars (which your Orator and Orators utterly deny and they allege that the said amount is made up principally of usurious charges) to the said John Patterson procured on your Orator and Orators to execute a Mortgage and deliver to him another deed of the whole of said property to hold the same for the term of five years more, that is to say until the twenty fourth day of April 1861, as by the said deed recorded in Liber E D No 83 folio 71 will appear, And your Orator and Orators further shew and charge it to be true that the said John Patterson in his life time received all the rents of said property amounting to a large sum of money. And your Orator and Orators further shew that afterwards to Wit some time in or about the 7 month of February 1857 the said John Patterson departed this life having first made and published his last Will and testament in writing whereby he appointed Nathan T Dushane to be executor thereof and that soon his death to Wit on or about the 7 day of April 1857 the said Nathan T Dushane obtained from the Orphans Court of Baltimore City Letters testamentary and of administration of the personal Estate of said John Patterson deceased and hath taken possession of the personal Estate books and papers of his said Testator and hath received all the rents of said property since the death of his said testator. And your Orator and Orators further shew and charge it to be true, that the last settlement between your Orator and the said John Patterson, a full and detailed statement of all the transactions between them and of all the moneys lent and advanced by the said John Patterson to your Orator, and of all the payments, made to and rents received by him was made out in writing which it will appear that the said John Patterson had been long seriously and satisfied from all the moneys so lent and advanced by him to your Orator with all the interest thereon, which statement your Orator and Orators charge was found amongst the papers of the said John Patterson after his death, and was taken possession of by his said Executor, and still in the possession of the said Executor. And your Orator and Orators further shew that they do not keep and have no Copy of said statement and that they have no memorandum of and cannot state with any accuracy the dates and amounts of the moneys so lent and advanced to your Orator; And your Orator and Orators have frequently and in a friendly manner applied to the said Nathan T Dushane Executor as aforesaid to account to and with your Orator and Orators of and concerning the moneys so lent and advanced paid, laid out and expended for them by the said John Patterson and for