Edward T Carter
James T Gifford et al | In the Circuit Court for Baltimore City.

To the Honorable William George Krebs Judge &c

The petition of Henry James John Monnemann Arthur McClain, John C F Monsteur and Robert Carrickson of the City of Baltimore shews unto your Honor that the Defendant James T was prior to the 14th day of December 1856 indebted unto your petitioners in various sums of money. That is to say unto your petitioner Henry James in the sum of three hundred and fifty dollars unto your petitioner John Monnemann the sum of fifty dollars unto your petitioner Arthur McClair in the sum of fifty dollars. your petitioner Monsteur in the sum of fifty two dollars and interest and unto your petitioner Carrickson one hundred and eighty nine dollars and six cents, And your petitioners further shew that the said James T on the 14 day of December 1855 by deed of that date pretended to convey for the pecuniary consideration of two hundred and sixty seven dollars the ground and premises mentioned and referred to in the Original Bill filed in this cause which now then and are now worth two thousand dollars unto his brother the defendant Thomas and that the said Thomas by Deed dated November 12th 1856 pretended to convey the same property unto an other brother the defendant Hugh in trust for the benefit and use of James T & the defendant Ann Elizabeth Copies of which deeds are filed with the Commission and your petitioners pray that they may be taken as part of this petition,

And your petitioners charge that by the deed of December 14th 1855 the said James T divested himself of all his property and became thereby as he hath to this day been insolvent and that the two deeds aforesaid were made without any legal consideration and were colorable merely and with the intent to settle the property upon the said James T all whereof are contrary to Equity and good Conscience and in fraud of the rights of your petitioners.

And your petitioners charge over that the said James T on the 17 day of March 1859 applied for the benefit of the Insolvent Laws of Maryland but, that his application was refused by a Judgment of the Court of Common Pleas on the 14th day of July 1860 Copies of which proceedings in that Court are filed in this cause and your petitioners pray they may also be taken as part of this petition, And that your petitioners have no knowledge further of the aforesaid deeds until the time of his James application for the benefit as aforesaid,

To the end that your petitioners may become Complainants in this cause under the terms mentioned in the Original Bill that the defendants may answer this petition that your petitioners may support their petition by proper proofs and that they may have such other and further relief as their case may require

May it please your Honor to pass an Order making your petitioners Complainants on such terms as may be right and for remanding the commission to take testimony in support of their allegations, And as in duty &c.

John Carson Solr for Carrickson & Monsteur
L M Reynolds for Henry James Monnemann & McClain

Carter
vs | In the Circuit Court for Baltimore City.
Gifford

Ordered on the aforegoing petition on this 11 day of April 1861 that the petitioners is permitted to be and be Complainants in this cause upon the terms stated in the Original Bill of Complaint, And it is further Ordered that the Commission be remanded as prayed in said petition unless cause to the contrary thereof be shown on or before the 18th day of April inst. Provided a Copy of this Order be served on the defendants Counsel on or before the 12th day of that Month,

Wm Geo Krebs.

Filed 11th April 1861.

Edward T Carters and others
vs | In the Circuit Court for Baltimore City.
James T Gifford and Ann Elizabeth Gifford and others

To The Honorable William Geo Krebs Judge of said Court,

The answer of James T Gifford and Ann Elizabeth his Wife and Thomas Gifford and Hugh Gifford to the petition of Henry James John Monnemier Arthur McClain John C F Monsteur, and Rebecca Carrickson filed in this cause,

Saving to themselves the benefit of all exceptions to said petition this respondents answering say, that for answer to the allegations charging fraud against the Conveyance in trust for the Respondent Ann, they beg to refer as part of this Answer to the answers of them respectively already made in this cause,

And said James T Gifford separately answering denies that he became indebted to said Petitioner respectively at the times stated in said petition, or in all instances in the amounts severately specified and in the respect answering he says that the indebtments respectively avoid at the times following to wit, To James in the year 1856 and was by Returns in the year 1857 reduced to Eighty eight 98/100 dollars, and are not entered, To Monnemonier in the year 1857 and 1858, this Respondent not knowing the amount of the Claim and not remembering that any bill or demand was ever tendered or made for any amount to McClain in the year 1857 and to amount of only Thirty dollars. To Monsteur in the year 1856 and only for Fifteen dollars. To Robert Carrickson in 1857 and for Twenty two dollars subject to a deduction of Twenty dollars, a prior balance in said Respondents favor, And this defendant James as does for himself the said Ann Elizabeth Gifford pleads Limitations against each and all of the said claims of said petitioners respectively and prays to have the benefit in bar thereof of the Act and acts of Assembly and Laws of the State of Maryland for Limitation of actions and avoiding suits as applied in Equity, and so plead and object to said Thomas and Hugh And said Ann Elizabeth answering separately and relying on and praying the benefit of said bar of Limitation says that she does not know ought of the said Claims pretended by said petition and does not admit that they or any of them ever accrued and furthermore said Ann Elizabeth Gifford can do