said decedent Henry Hoecker in his life time, and which is so indebted to your Orator, was seized and possessed of another lot of ground and improvements thereon, fully set forth and described in a deed of assignment from Henry Hoecker to Jacob Hoecker, a certified Copy being herewith filed marked Complainants Exhibit C and prayed to be considered as part of this Bill. Your Orator further charges and alleges that the said decedent Henry Hoecker in his life time and when so indebted to your Orator fraudulently and with a view and design to hinder delay and defraud your Orator and his other Creditors of their just and lawful claims against him, did assign the secondly described lot of ground and improvements thereon fully set forth in the Complainants Exhibit C to his decedents Son Jacob Hoecker on the 13th day of May 1862. for the pretended Consideration of Eighteen hundred dollars, subject to the payment of the yearly rent of forty two dollars and twenty five cents. Your Orator further alleges and charges that the consideration set forth in said mentioned deeds of assignment are false and fraudulent; and that the parties to said mentioned deeds, at the time of the making and execution thereof, well knew the fact, and that they were made and executed voluntarily and colorably with the fraudulent and common intent and purpose of the parties thereto, to defraud your Orator and other of the Creditors of said decedent Henry Hoecker of their just claims and demands and to delay, hinder and defraud your Orator and his other Creditors in the collection of the just and lawful amounts due them by said Henry Hoecker in his life time. Your Orator further alleges and charges that the said Charles Hoecker by a Deed of Conveyance (the Creditors of which have all been complied with) dated the 5th day of November 1863, a Certified Copy of which is herewith filed marked Complainants Exhibit D, and prays to be taken as part of this Bill; did bind himself & in the sum of Two thousand dollars to a certain Henry Sahm his attorney to convey unto him the said Sahm in Consideration of the sum of Seventy six hundred dollars paid and to be paid by said Sahm to said Hoecker or Fifteen hundred dollars before the date of said Bond, and Eleven hundred dollars on the 16th day of January 1864 the Lot of ground and improvements which was assigned to the said Charles Hoecker by his father Henry Hoecker by virtue of the deed of assignment hereinbefore marked as Complainants Exhibit B. Your Orator charges and alleges that said Sahm was well aware of the indebtedness of said decedent Henry Hoecker in his life time, to your Orator and other persons) and of the fraudulent conveyance

of his property to his said Sons Charles and Jacob, with a view to defraud and defeat your Orator and other Creditors of said Henry Hoecker of their just claims and demands against said Henry, did nevertheless purchase from him the said Charles Hoecker the Lot of ground so above mentioned well knowing the debts of said Charles thereto to be fraudulently and invalid by reason of the frauds perpetrated by said Henry Hoecker and Charles Hoecker in the execution thereof. Your Orator further alleges and charges that the said Charles Hoecker and Jacob Hoecker the sons of the said decedent Henry Hoecker, were duly cited by the Honorable the Orphans Court for Baltimore City at the instance of your Orator and other Creditors of said decedent Henry to take out Letters of administration on whatever Estate their Father deceased father deceased was possessed of; they declined doing so, alleging as a reason therefor he had left no Estate on which to administer notwithstanding full short time had elapsed before his death when the Conveyance of his property was made to him, his said sons by the deeds of assignment before mentioned bearing an even date, & Consideration paid said decedent Henry by them amounting in the aggregate to Four thousand dollars. Your Orator again alleges and charges that said Conveyance of the Lots of ground by said decedent Henry Hoecker in his life time to his said Sons Charles and Jacob are which is indebted to your Orator, were fraudulent, and without consideration, and made with the common intent to injure and defraud your Orator and other Creditors of said Henry. And your Orator is remediless in the premises and is unable to obtain adequate relief against the said Charles Hoecker Jacob Hoecker and Henry Sahm without the aid of this Court. To therefore prays the matters and facts hereon specified and set forth may be enquired into by your Honor that the deeds of assignment hereinbefore mentioned from said decedent Henry Hoecker and from Charles Hoecker to Henry Sahm may each and all of them, for the reasons herein alleged of fraud in their execution be declared null and void and of no effect, to the end your Orator and other Creditors of said decedent Henry Hoecker may be deemed their just Claims and demands; and your Orator charging and alleging that said Jacob Hoecker may and will falsely and fraudulently assign and convey away the property herein before by the foul fraud of his said Father and himself and your Orators be left entirely remediless in the premises. May it please your Honor to grant unto your Orator, the Writ of Injunction to the said Jacob Hoecker, enjoining and restraining him from selling or disposing of the Lot of ground and improvements fully set forth and described in the deed of assignment from Henry Hoecker to Jacob Hoecker, a Certified Copy of which is hereinbefore filed marked Complainants Exhibit C. And that said Charles and Jacob Hoecker may be called on to answer fully and severally, to what may the Consideration set forth in the deeds of assignment from their Father Henry Hoecker to each of them, was paid whether in full at the execution of said deeds of assignment; or only what in what discounts and denomination of money; whether any promissory Notes due bills or other written Evidences of debt were executed by them; for what amounts when due and payable and whether or not they have been paid or renewed, & wherein where of and to the end that the said defendants Charles Hoecker Jacob Hoecker and Henry Sahm, may answer the several matters and things hereinbefore mentioned and charged as fully and particularly as if they were herein again stated and they were thereto specially interrogated; and that it may please your Honor to grant the Writ of Injunction as prayed for against the said Jacob Hoecker