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described in Exhibit A herewith filed at the price of six thousand three hundred and fifty dollars, subject to a certain mortgage debt of one thousand dollars due to one McCormick, and purchase money was agreed to be paid by the said Dobsons receiving the said Eleventh Street property at the value of four thousand and five hundred dollars & the said Cox street property at the value of about nine hundred dollars, and by his receiving the residue, amounting to a little over nine hundred dollars in money And it was at the time of said purchase agreed between your oratrix & the said John Chatterton that they should jointly hold the said farm as tenants in common their respective interest therein being in proportion to the sums by them respectively contributed, the said two houses & lots contributed by your oratrix being estimated & taken between her & the said John Chatterton at the same valuation put upon them in the said exchange made with the said Dobson and it was further agreed that the said John Chatterton to whom the title was to be conveyed by the said Dobson as the party holding the legal title of the Philadelphia lots should thereupon execute a good and sufficient conveyance to your oratrix of her said interest in said farm as so ascertained. And your Oratrix further sheweth that the said agreement made with the said Dobson was consumated by the conveyance to him of the said Philadelphia lots whereof your oratrix was the equitable owner as aforesaid, and by the payment to him by the said John Chatterton of the said residue of the estimated purchase money amounting to a little

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upwards of nine hundred dollars, And a deed of said Baltimore County land, bearing date the said twentieth day of July 1859 was executed to the said John Chatterton and was delivered to your oratrix, or to her said husband for her, to be by her retained and held till the preparation & execution of a deed to her by the said John Chatterton in pursuance of said agreement of her share or interest in said land. And said deed now produced by your oratrix is herewith filed as part of this bill being marked exhibited A. And your oratrix (with her said husband) and the said John Chatterton thereupon entered into joint possession of the said farm and your oratrix has ever since resided on the same as one of the purchasers thereof.

And your oratrix doth also charge that the said John Chatterton fraudulently intending to violate & defeat said trust & deprive your oratrix of her just & equitable interest in said land hath obtained and taken to himself another deed thereof from the said Dobson without the knowledge or consent of your oratrix & hath put the same on record without executing a conveyance to your oratrix of her share in the property so jointly purchased as aforesaid and that the said John Chatterton in fact hath refused & still refuses to execute to her any conveyance of any part or share of said land, and by a fraudulent abuse of the legal title wherewith he is vested threatens & is endeavoring to turn your oratrix out of possession of said land by legal process or by force.

In consideration whereof & for as much as your oratrix is remediless at the common law to the end therefore that the said John Chatterton may full