October Term 1868

"Defendant Exhibit No 1."

To the Honorable The Judges of Baltimore County Court sitting in Chancery

Humbly complaining sheweth unto your Honors your orators John Glenn of the City of Baltimore and the President and Directors of the Union Bank of Maryland.

That Stewart Brown and Mary Lancaster being seized of a Lot of ground described as follows, to wit: Beginning at the corner formed by the intersection of the south side of Monument formerly John street and the east side of Little Constitution street thence running eastwardly bounding on the south side of Monument street One hundred and ten feet to the line of ground lately owned by Charles Crook Junior then southwestwardly bounding on that line to a point distant 90 feet southwardly from Monument street measuring at righ angles therewith, then westwardly parallel with Monument Street to Little constitution street then Northwardly bounding on the East side thereof ninety feet to the beginning on the sixteenth day of October Eighteen hundred and twenty six executed and delivered to Charles Crook Junior, a bond of Conveyance for the same whereby it was agreed that on the payment of the purchase money for said property the same should be conveyed to Charles Crook in trust for Sarah Ann Crook his wife with power to said Sarah Ann to sell and dispose of said property in any manner she thought proper as by reference to such Bond of Conveyance, a duly certified Copy whereof is herewith filed and is prayed to be taken as a part of this Bill marked Exhibit A, will more fully and at large appear.

And Your Orators further state that said Stewart Brown and May Lancaster received the whole purchase money agreed to be paid for said property. That said

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Brown hath departed this life leaving the following persons his heirs at Law. John Brown, J. Harman Brown, Stewart Brown George A. Brown Margaret Worrell, the wife of John D. Worrell, Sally H. Brown now Sally H. Doughty the wife of James H. Doughty, and a widow Sarah Brown, and Sophia Brown, and James M. Brown infants under the age of twenty one years.

And the said Mary Lancaster hath died, leaving the following persons her heirs at Law, William Chrisfield, and Sophia Mommonier wife of Thomas C. Mommonier, and that none of said parties ever made and delivered the said Crook a Deed for said property.

And your Orators further state that the said Charles Crook being indebted to your orators John Glenn in the sum of Twenty Thousand Dollars for the purchase of a factory, upon which your Orators the Union Bank of Maryland had a lien or Mortgage in order to secure the payment of said sum with Interest in the manner stipulated in the mortgage hereinafter mentioned by Deed of Mortgage dated the 21st. day of November in the year Eighteen hundred and thirty four executed and delivered to your Orator John Glenn a deed of Mortgage of said property so agreed to be sold him as aforesaid upon condition that the same should be void on payment of the aforesaid sum of money with interest as will more fully appear by reference to such Mortgage deed herewith filed, marked exhibit B, and which is also prayed to be taken as a part of this Bill of Complaint.

And your Orators further state that although the said mortgaged debt hath been long past due yet that neither said Crook nor his wife, nor any one for them hath paid the same, all of which actings and doings are contrary to Equity and good conscience, and tend to the