Walter to defraud your orators and deprive them of the amount of said debt of flour and of the fruit of said judgment by executing and causing to be executed certain false and fraudulent conveyances and bills of sale. namely, the deed and bill of sale hereinafter mentioned by means of which deeds and bills of sale the said John Walter caused his said leasehold property and all moveable chattels to be fraudulently and without consideration granted or transferred to Catherine Walter his wife, the said leasehold property and moveable chattels constituting all the property of said John Walter and the whole fund out of which your orators and his other creditors could have been paid; and your orators state that the deeds hereinbefore referred to and which your orators charge to be false and fraudulent as to your orators, and made without consideration are as follows; a deed for said leasehold property from said John Walter to Adam Walter, his father, dated on the seventh day of April A.D. 1870. and recorded among the Land Records of Baltimore City in Liber G. R. No. 464 folio 548 &c and a deed for the same property from said Adam Walter to said Catherine Walter dated on the eleventh day of April A.D. 1870. and recorded among said Land Records in Liber G. R. No. 466 folio 408 &c, and your orators further state that the bill of sale hereinbefore referred to and which your orators charge to be false and fraudulent as to your orators, and made without consideration are as follows; a bill of sale from said John Walter to said Adam Walter dated on the seventh day of February A.D. 1871. and recorded among the Chattel Records of Baltimore City in Liber G.R. No. 45 folio 423 &c. and a bill of sale from said Adam Walter to said Catherine Walter dated on the 13th day of November A.D. 1871. recorded among said Chattels Records; both bills of sale being for the same chattels, to wit, all the chattels of said John Walter: And your orators believe, charge and aver that the aforesaid deeds and bills of sale from said John Walter to said Adam Walter, and from said Adam Walter to said Catherine Walter are fraudulent as to your orators and that the pretended considerations therein named have not been paid, and that the said John Walter has no other means to pay your orators said judgment against him for the said sum of Seven Hundred and seventy three dollars and eight cents, being the amount of his said indebtedness for said flour and interest. All which actings and pretences of said complainants are contrary to equity and good conscience and tend to the manifest wrong, injury and oppression of your orators

in the premises. In tender consideration whereof, and for as much as your complainants are remediless in the premises according to the strict rules of the common law, and can only have relief in a Court of Equity; To the end therefore that the said John Walter and Catherine Walter may answer the premises upon their several corporal oaths, and that the said deeds of assignment and bills of sale from said John Walter to Adam Walter and from said Adam Walter to said Catherine Walter of said leasehold property and moveable chattels described therein may be declared null and void and set aside and cancelled, and that said property described in said deeds and bills of sale may be sold by order of this Court and the proceeds applied to the payment of said judgment and costs; and that your orators may have such other and further relief as their case may require, and as to your Honor may seem meet. May it please your Honor to grant the State of Maryland's writ of Subpoena directed to said John Walter and Catherine Walter both of said City, commanding them to appear in this court on some day to be therein named and answer the premises, and to stand to, and abide such decree therein as your Honor shall seem meet, and your orators shall ever pray &c

Philip C. Friese
Solr for Complainant

Riehl et al
vs
John Walter et al.

filed 8th January 1872

Answer

To the Honorable C. W. Pinkney Judge of the Circuit Court for Baltimore City

The Answer of John Walter and Catherine Walter of the City of Baltimore to the Bill of Complaint of Conrad Riehl and Henry Riehl in this Honorable Court exhibited.

These respondents reserving to themselves all and all manner of exceptions to the manifold many and misstatements of said Bill of Complaint for answer nevertheless to so much thereof as is pertinent say. These respondents admit that John Walter acquired the title to the real estate in question situate on Eastern Avenue in said City of Baltimore and particularly described in said Bill of Complaint are in about the dates stated therein from one John George Homming and wife. These respondents further answering admit that the conveyances referred to in said Bill of Complaint were executed in or