property that could be subjected to the payment of said single bill. And your orator believes they have no other property now that can be subjected to the payment of said single bill. And the said Christian Hartung then had no property that could be subjected to payment of said single bill.

Your orator further shows that notwithstanding said deed the said Wilhelmina Zimmer and John Zimmer continue to live upon and occupy said lot of ground described in said deed.

Your orator charges that at the time of making said deed to said Edward H. Hartung, the said Wilhelmina Zimmer and John Zimmer were largely indebted to your orator upon said single bill and as surviving obligors they are now largely indebted unto your orator upon said single bill in about the sum of six hundred and sixty-seven dollars and eighty-four cents and that they have no property that can be subjected to payment of said sum due upon said single bill except the said lot of ground described in said deed, that said deed was intended to convey away all the property of said Wilhelmina Zimmer and John Zimmer her husband which could be subjected to the payment of said single bill.

Your orator further charges that the said deed was fraudulently made, not for bona fide, but for simulated and pretended consideration, and made to hinder, delay and defraud your orator and other creditors, and especially your orator, of his and their just and lawful debts and claims against the said Wilhelmina Zimmer and John Zimmer, and that said deed is therefore fraudulent and void and contrary to equity and good conscience. The said Edward H. Hartung is an infant

under the age of twenty-one years and your orator is advised that he is a proper party to this suit.

To the end therefore that the said Wilhelmina Zimmer and John Zimmer, her husband, and Edward H. Hartung and Wilhelmina Zimmer and John Zimmer surviving obligors may answer the several matters and things hereinbefore stated as fully and particularly as if they were herein again repeated and they were thereunto specially interrogated, and that the said deed from the said Wilhelmina Zimmer and John Zimmer her husband, to the said Edward H. Hartung for the said lot of ground may be declared to be void, and may be vacated and annulled and that the property in the said deed mentioned or so much thereof as may be necessary to discharge the claim of your orator and the claims of other creditors of the said Wilhelmina Zimmer and John Zimmer who may come in as parties to this suit may be sold, and that your orator may have such further or other relief as his case may require. May it please your Honors to grant unto your orator the writ of subpoena against the said Wilhelmina Zimmer and John Zimmer her husband and Edward H. Hartung, and Wilhelmina Zimmer and John Zimmer said surviving obligors, all of Allegany County, State of Maryland, commanding them to appear in this court at some certain day to be therein named, to answer the premises and abide by and perform such decree as may be passed therein.

And as in duty, &c.

Thos. B. Gonder,
Sol. for Complainant.

"Complainants Exhibit A" filed with the aforegoing bill in the words following, to wit:

At the request of Edward H. Hartung this