Insolvent Trustee of Jesse H. Haugh Defendants.

The bill of complaint in this cause was filed in Court here on the 16th day of September, A. D. 1884, and with said bill, and as a part thereof, exhibits marked "Nos. 1 and 2," and special interrogatories to Manoah Metz and Jesse H. Haugh, to be answered by them under oath, were filed as follows, to wit:

Bill of Complaint.

Your orators and oratrix complaining, shew:

1st. That your orators, Manlsby and Elebaugh, are trustees under a deed executed by your orator, William Haugh, and your oratrix, Ann Frances Steiner, on the 3d day of May, in the year 1884 — a copy of which is herewith filed, marked "Exhibit No. 1," and which, with all other exhibits herewith filed, your orators and oratrix pray may be taken and considered as parts of this bill of complaint. Your orator, William Haugh, is a creditor of the defendant, Jesse H., and is also bound as security of the said Jesse H. in large sums of money. Your orator, George T., is a creditor of said Jesse H. in a large sum, and your oratrix, Ann Frances, is entitled to a residuum of the estate of said William Haugh, as will fully appear from said deed of trust: that said Charles E. Fink is permanent trustee in insolvency of said Jesse H. Haugh. That your orators and oratrix are all of Carroll county; that the defendant, Jesse H. Haugh, and Margaret A., his wife, and said Charles E. Fink, are of said Carroll county, and the defendant, Manoah Metz, is of Washington county, in the State of Maryland; and that your orators and oratrix bring this suit as well in their own behalf as of all other





creditors of said Jesse H. Haugh who will come in and contribute to the expenses of this suit.

2d. That on the 9th day of May, in the year 1883, the said Jesse H. Haugh and Margaret A., his wife, executed to said Manoah Metz, a deed of conveyance of a lot of ground in Taneytown in said Carroll county, with the buildings and improvements thereon, for the pretended consideration of three thousand five hundred dollars — as will appear from a copy of said deed herewith filed, marked "Exhibit No. 2;" that on the 7th day of November in the same year, the said Jesse H. applied for the benefit of the Insolvent Laws of Maryland — as will appear from the proceedings in the cause, numbered 15 on the Insolvent Docket of the Circuit Court for Carroll county; that at and prior to said 9th May, your orators, William Haugh and George T. Motter, were creditors as aforesaid of said Jesse H., and your orator, William, was security of said Jessee H. as aforesaid, and that at said time the said Jesse H. was largely indebted to divers other persons, and was wholly insolvent and unable to pay said debts, at all events without applying thereto the property conveyed by said deed, and the proceeds thereof, and that said Jesse H. was not possessed of other property besides that conveyed by said deed, sufficient for the payment of his debts.

3d. That the said Manoah Metz did not in fact pay to said Jesse H. Haugh the said consideration money in said deed mentioned, or any part thereof, out of or from his own monies, and that if any part of said sum of three thousand five hundred dollars was