

Bill

and that it will be greatly to the interest and advantage of all said parties interested, as well the defendants as their complainants and the infants as the adults that the aforesaid real estate should be sold under the order of your Honorable Court and that the proceeds of such sale should be divided or distributed amongst the said parties under the direction of your Honorable Court according to the respective rights and interests of the said parties as aforesaid and your complainants further show that the said Stephen Doney, Saml J Baker and Maria J Baker his wife Julia J Doney and Frank Doney jr John Peter Lawrence and Frances Lawrence his wife are all non residents of this State and beyond the jurisdiction of this Honorable Court. To the end therefore that the said Defendants herein after named may answer the several matters and things hereinbefore stated as fully and particularly as if they were herein again repeated and that the said Defendants were thereunto specially intrigated and that a decree may be passed for the sale of the aforesaid lands and that the proceeds of said sale may be divided and distributed amongst the said parties interested therein as aforesaid in the proportions herein before stated and that the share or proportion thereof which would otherwise accrue to the said Maria Ann Lawrence as one of the heirs at law of the said Sarah Maria Lawrence deceased may be decreed to be taken and received by the said Charles F and Stephen J Lawrence as the purchasers and assignees of the said Maria A. as aforesaid in accordance with the terms of their said agreement and that your complainants may have all such other and further relief as the nature of their case may require. May it please your Honorable Court to grant unto your complainants an order of publication giving notice to the said Stephen Doney, Saml J Baker and Maria J Baker his wife Julia J Doney Frank Doney jr John Peter Lawrence and Frances Lawrence his wife who are all non residents as aforesaid of the substance and object of this Bill and naming them to appear in this Court in person or by solicitor on or before some certain day to be therein named to answer the premises and show cause if any they have why a decree ought not to pass as prayed. And also a writ of subpoena against the said Henry Simms and Martha C Simms his wife of Frederick County, Prudence H. Owings and Sarah M. Owings his wife of Carroll County, James J. Lawrence of Baltimore City and John W. Barbour and Rebecca Barbour his wife of Frederick County, commencing them to appear in this Court at some day certain to be therein named to answer the premises and abide by and perform such decree as may be passed therein. And as in duty bound &c.

E. J. Davis & Co
Solicitors for Complainants