

No. 4631 Equity

Charles E. Mealy and
Mary R. Mealy his wife

Barbara Marriott John
M. Ryan, Charles H. Mar-
riott et al.

To the Honorable the Judge of the Circuit Court for
Frederick County, sitting as a Court of Equity.

The Bill of Complaint of Charles E. Mealy and Mary R.
Mealy, his wife, of Frederick County, in the State of Maryland, respectfully represents unto
your Honor, that some time in the year Eighteen hundred and fifty seven, a certain Adelia Mar-
riott of Frederick County died seized, and possessed, and the owner of certain real estate, situate
lying, and being in Frederick County, Maryland, and particularly described in the return of certain
Commissioners, appointed, and selected to divide the lands of a certain Charles Hammond then
deceased, whose return her the said Adelia Marriott then was, and also particularly described in a
Warrant from Charles Hammond to the said Adelia Marriott, certified, copies of which return of said
Commissioners, and the abovesaid deed are herewith filed marked Exhibits A & B, which Exhib-
its with all others by these Complainants herewith filed they pray, may be taken, and considered as a part
hereof as fully, as if herein inserted in words, and figures

Bill of
Complaint

Your Complainants further represent unto your Honor that the said Adelia Marriott being so seized
and possessed, died intestate, and left surviving her, a husband, named Alpheus W. Marriott and the
following children, as heirs, at law, to wit: Your Complainant then Mary R. Marriott, Laura Mar-
riott, Charles H. Marriott and James R. Marriott and that the abovementioned real estate descen-
ded to and vested in them, as tenants in common, each having a fourth undivided interest therein,
subject to the life estate of the said Alpheus W. Marriott as the surviving husband of the said
Adelia Marriott.

Your Complainants further represents that in the year eighteen hundred, and seventy three
your Complainant then Mary R. Marriott, intermarried with your other Complainant Charles
E. Mealy, that in the same year the said Laura Marriott intermarried with John M. Ryan, that
these Complainants, are informed, and to charge that within the past few years both the said
Charles H. Marriott and James R. Marriott have intermarried but the Christian names of
their wives and whether said wives are yet living or dead, are unknown to your Complainants, and
that sometime in the year eighteen hundred and seventy nine, the said Alpheus W. Marriott intermar-
ried with Barbara Robinson.

These Complainants further represent, and charge that sometime in the year Eighteen hundred
and seventy four, the said Laura Ryan departed this life intestate without children surviving her,
leaving her said husband John M. Ryan, surviving her, and that she possessed a one fourth interest
at the time of her death in the real estate described in Exhibit A & B, which undivided interest de-
scended to and vested in your Complainant Mary R. Mealy, Charles H. Marriott and James R. Marri-
ott, as the heirs and next of kin of the said Laura Ryan, subject to the life interest of the said John M. Ryan as the
husband of the said Laura Ryan, and the life estate which the said Alpheus W. Marriott had therein.

These Complainants further represent, and charge that in the year eighteen hundred and
the said Charles H. Marriott conveyed by way of deed of Mortgage to one Simon C. Summers
all his undivided interest in, and to that portion of the real estate described in Exhibit A, which was
afterward, conveyed to the said Alpheus W. Marriott in his life time by deed from John Summers Trustee
in No. 3370 Equity in the Circuit Court for Frederick County sitting as a Court of Equity, a certified
copy of which deed as recorded among the Land Records of Frederick County is herewith filed, marked
Exhibit C, said No. 3370 Equity, being Equity proceedings to foreclose said deed of Mortgage a-
bovementioned

These Complainants further represent, and charge that on the third day of January, in the