In tender Consideration whereof, and for as much as your Complainants are remediless, in the premises, by the strict rules of the Common law, and only relievable in a Court of Equity where matters of such nature, are properly Cognizable, and to the end that a Court to take charge of all the effects, and Estate of said Firm of Reid & Bateman, and may be empowered by the Order & Decree of this Court to sell the personal Estate of said Firm, and to sell the Real Estate of said Firm free and divested of all liens thereon, or so much thereof as may be necessary, for the payment of the Debts due by said firm and with power to pay and Satisfy all debts due by said Firm according to the legal & Equitable priorities of their creditors, and to wind up said firm with all convenient dispatch and That your Complainants may have all such other & further relief in the premises, as the nature, and the Equity of their case may require, and to the end that the defendants, may upon their several Corporal Oaths, answer the several matters, and things charged in this bill of Complaint, may it please your Honor to grant to your Complainants the writ of Subpoena, in the usual form directed to the Sheriff of Frederick County, Commanding him to Summon Elkanah Bateman Surviving Partner, Michael Keefer, Joshua Dell Rasamus D. Rice, widow of Lewis Rice Elkanah Bateman & Sarah E Bateman his wife Charles I. Rice Martha M. Rice, Benjamin F Rice, and Lewis F. Rice, defendants, to be, and appear in this Court, by a certain day in person or by solicitor, and then and there answer the several matters, and things, charged in this Bill & Show Cause if any they have why a Decree should not pass as prayed and your Complainants will ever pray &c

Wm. J. Ross Sol for Compt.
Worthington Ross

Exhibit No 1 is in the words & figures following Viz
At the request of Lewis Rice & Elkanah Bateman the following Deed was Recorded 4th January 1850 1850 Jany 4th Recorded Stamp Paty.
W B. Tyler Clk.

This Indenture made this 1st day of January, 1850 between Michael Keefer, and Catharine A Keefer his wife of Frederick County in the State of Maryland, of the one part, and Lewis Rice & Elkanah Bateman of the said County and State of the other part: Witnesseth. That for and in Consideration of the sum of Five thousand five hundred dollars Current money by the said Lewis Rice, & Elkanah Bateman to the said Michael Keefer in hand paid, at and before the sealing & delivery of these presents, the receipt whereof is hereby acknowledged the said Michael Keefer & Catharine A Keefer have bargained and sold aliened and enfeoffed and by these presents do give grant bargain & sell, alien enfeoff release, convey & confirm, unto the said Lewis Rice & Elkanah Bateman, as Tenants in Common, their heirs & assigns, all the following piece, or parcel of Land, to wit: being part of the Real Estate of the late Major Henry Keefer and commonly known as the Mill Property, Beginning for the same at a Stake, on the West side of the County Road leading from Frederick Town to said Keefer's Mill, it being at the end of the Tenth line of the whole Tract called "Keefer's Prospect" at