

Bill and Exhibits.

To the Honorable W. Nelson Judge of the Circuit Court for Frederick County sitting as a Court of Equity, Humbly complaining sheweth unto your Honor, your orators and oratrices Elizabeth Fox, John P. Fox and Catharine Fox his wife, Jacob Palmer and Nancy Palmer his wife, David Bechtol and Rebecca Bechtol his wife, Daniel Mangans and Elizabeth Mangans his wife, Samuel Mangans and Mary Mangins his wife, Jacob Mangans and Rebecca Mangans his wife, William Wolfe and Nancy Wolfe his wife, John F. Smith and Maria Smith his wife, Martin Mangins, John Mangins that John Mangans late of Frederick County, sometime since, during the present year, departed this life who died intestate leaving a valuable real estate lying and being situate in Frederick County comprising about two hund and twenty one acres more or less, it being a part of a tract of land called "Good Hope Enlarged" which tract or parcel of land is fully described in a deed from Christian Gilbert to the said John Mangans deceased, a true copy of which is here exhibited marked Exhibit No. 1, which together with all other exhibits your orators and oratrices pray may be taken and considered a part of this Bill, as if here inserted. - That part of said tract of land embraced in said deed of which the said John Mangans died seized is shown by a survey made by W. D. Brown, which is here exhibited marked No. 2. - Your orators and oratrices further charge that the said real estate will not admit of a division amongst all the heirs of the said dec^d without loss and injury, but that it would be to their advantage and interest to have said land sold, by a trustee to be appointed by this Court. - Your orators and oratrices further state that the said John Mangans died leaving the following children and grand children to wit - Elizabeth Fox, Catharine Fox the wife of John P. Fox, Nancy Palmer the wife of Jacob Palmer, Rebecca Bechtol the wife of David Bechtol, Daniel Mangans, Samuel Mangans, Jacob Mangans aforesaid, are the children and heirs at law of the said John Mangans deceased; that Nancy Wolfe the wife of William Wolfe, Maria Smith the wife of John F. Smith, Martin Mangins, John Mangins, Jacob Mangans, Levi Mangins, Manda Mangins are the grandchildren of the said John Mangins, and the children of John Mangans Sr. deceased, son of the said John Mangins Sr. the intestate who are also heirs at law of the said intestate, that the said Jacob Mangins, Levi Mangins and Manda are infants under the age of twenty one years -

In tender consideration whereof and for that your orators and oratrices are remedied in the premises by the strict rules of the common law and relievable only in a Court of Equity, where matters of this nature are properly cognizable. -

To the end therefore that the said Jacob Mangins, Levi Mangins and Manda Mangins the defendants in this case may full, true and perfect answers make to all and singular the charges and matters aforesaid as fully as if the same were here again repeated. - May it please your honor to order adjudged and decree that all the real estate of which the said John Mangans the intestate died seized situate in Frederick County, be sold by a trustee to appointed for that purpose &c. and may it please your Honor to extend to your orators and oratrices all such other and further relief in the premises as the nature of the case may require, and as to your Honor shall seem meet; May it please your Honor to grant unto your orators and oratrices the State of Maryland's writ of Subpoena to be directed to Jacob Mangins, Levi Mangins and Manda Mangins thereby commanding them and each of them at a certain day therein to specified to appear before your Honor in this Honorable Court, then and there to answer the premises aforesaid, and to perform and abide such order, direction and decree therein as to your Honor shall seem meet and your orators and