

has been paid and that said John Arnold had during his life adverse possession thereof for a period of more than twenty years - as also of a lot called the Draper Lot purchased and held by said John Arnold at the same time in the same manner and for the same length of time with the land last heretofore named, as will appear by said Exhibit No 13 - also of a small parcel of land heretofore conveyed by Peterbridge Horsey and Mary D Gouvenour to said John Arnold as and for four and a half acres of land, as will appear by said deed filed herewith as Exhibit No 14 - also of a mountain lot heretofore conveyed by John Lusher man to John Arnold by deed as and for twenty eight and three quarters acres of land, as will appear by said deed filed herewith as Exhibit No 15 - also of a small tract of seven and three quarters acres of land purchased by John Arnold of the Estate of his father David Arnold for which he paid the full amount of the purchase money and has had possession thereof for more than twenty years - also of a house and lot of ground in Burkettville conveyed to John Arnold by George W. Padgett and wife by deed, which as filed herewith as Exhibit No 16 - your Orator further state that said John Arnold died intestate, leaving Elizabeth Arnold as his widow and the following named children as his heirs at law, viz David Arnold, John Arnold, Ezra Arnold, Joshua Arnold, Mahlon Arnold, Martin Arnold, Thomas Arnold, Huldah Arnold who has intermarried with your Orator Hanson Buchanan, and Sarah who has intermarried with your Orator John D. Cook - that said lands are incapable of division and are now held and owned by the above named children & heirs at law as tenants in common - that some of said children and heirs at law elect to take said real estate under the 47th Article of the Code of Public General Laws relating to inheritance and Descents and that it will be necessary to sell the same as well for the payment of the mortgage claim of said Richard H. Marshall as for distribution among the parties entitled to the same - that said children and heirs at law are all adult and cannot agree upon the sale of said real estate and that it will be necessary to have the same sold under a decree of your Honorable Court for the purposes aforesaid.

In tender consideration whereof and for that your Orator and Oratrices are remediless in the premises by the strict rules of the Common law and recoverable only in a Court of Equity, where matters of this nature are properly cognizable, - It is the end therefore that the said Sarah Arnold, Joshua Arnold, Richard H. Marshall, Mahlon Arnold, Samuel Abalt & Mary Abalt his wife, may answer all the matters and things aforesaid as fully as if the same were here again repeated and they thereunto particularly interrogated and that the sale of said tract of land to said Daniel by Quor may be ratified and confirmed and Trustees appointed to convey the same on the payment of the whole of the purchase money and that the residue of said real estate may be sold by a Trustee to be appointed for that purpose by your Honor and the proceeds of sale distributed among the parties entitled under the direction of your Honorable Court and that your Orator may have all such other and further relief in the premises as the nature of the case may require and to your Honor shall seem meet; May it please your Honor to grant unto your Orator the State of Maryland's writ of subpoena to be directed to the said Sarah Arnold, Joshua Arnold, Mahlon Arnold, Richard H. Marshall, Samuel Abalt and Mary Abalt his wife thereby commanding them to be and appear before your Honor in your Honorable Court on a certain day therein to be named to answer all and singular the charges and matters aforesaid and to stand to, abide and perform such order and decree therein as to your Honor shall seem meet and your Orator will ever pray &c.

George C. Challenger
 Sol. for Complainant.