

Conveyed by Joshua Dill and Mary Dill his wife by deed to said William Waters a copy of which deed is herewith Exhibited marked Exhibit No 1 which with all other Exhibits your Complainants pray may be taken as a part of this their Bill of Complaint. ~
 Your Complainants further state that upon the death of said Dr. William Waters the said lot of ground descended to his daughters Susan wife of Dr. Joshua G. Gibson and Ann F. wife of Dr. Harry W. Dorsey his sole heirs at law as coparceners. ~ Your Complainants further state that the said Joshua Gregg Gibson and Susan Gibson his wife by deed conveyed all their right, title and Estate in said lot of ground being one undivided moiety, to Susan Thomas one of your Complainants and wife of said Lewis Mc Thomas as her sole separate and exclusive Estate, as will fully appear by a Copy of said deed herewith Exhibited marked Exhibit No 2. ~

Your Complainants further state that the title to said lot is now vested in your Complainants Susan Thomas and the defendant Ann F. Dorsey as tenants in Common. ~
 Your Complainants further state that the said lands and tenements cannot be divided without loss or injury to the parties interested and that the interest and advantage of the parties entitled thereto will be promoted by a sale of the same - and a division of the proceeds of the sale thereof under the order and decree of the Court. ~
 Your Complainants further state that Harry W. Dorsey one of the defendants is not a resident of the State of Maryland and doth not reside therein, ~ It is and therefore that the said defendants hereafter named may answer the several matters and things hereinbefore stated, and that the said lands and tenements may be sold under a decree of this Court and the proceeds of sale distributed between the parties entitled to the same, and that your Complainants may have all such other and further relief in the premises as the nature and Equity of their case may require. ~

May it please your Honor to grant to your Complainants an order of publication giving notice to the said Harry W. Dorsey who is a non resident as before stated, of the substance and object of this bill, and warning him to be and appear in this Court in person or by solicitor on or before a certain day to answer the premises and show cause if any he had why a decree ought not to pass as prayed - and also a subpoena against Ann F. Dorsey of Frederick County, commanding her to appear in this Court at some certain day to be named therein, to answer the premises, and abide by, and perform such decree as may be passed therein, and as in duty bound. ~
 Your Complainants will ever pray. ~ Wm J. Chas. W. Ross
 Solicitors for Complainants

At the request of Wm Waters the following deed is recorded
 the 15th day of March 1837. ~

This Instrument of Writing made this thirty first day of January in the year 1837, between Joshua Dill and Mary Dill his wife, of Frederick County, in the State of Maryland of the one part and William Waters of the County and State aforesaid of the other part, Witnesseth that the said Joshua Dill and Mary Dill his wife, for and in consideration of the sum of four thousand five hundred dollars current money to them in hand paid by the said William Waters before the sealing and delivery of these presents the receipt whereof the said Joshua Dill and Mary Dill do hereby acknowledge and from every part and parcel thereof do hereby acquit, exonerate and discharge the said William Waters his heirs Executors and Administrators, they the said Joshua Dill and Mary Dill his wife, have granted, bargained, sold, aliened, conveyed and confirmed, and by these presents do grant, bargain, sell, alien, convey and confirm unto the said William Waters his heirs and assigns a new half of a lot of ground fronting on Second Street Number 115 being the South half thereof, situated in Frederick Town

Exhibit No 1.