departed this life on or about the second day of April in the year 1865, without she or her said husband having conveyed to your Orator said John E. Garrott all their right, title, claim and interest whatsoever in the lands described in said Exhibit B. as by the said agreement they were bound to do, and that since the death of said Olivia Crampton the said Oscar P. Crampton hath conveyed to your Orator, said John E. Garrott, all his right, title, interest & claim whatsoever in the lands described in said Exhibit B, as by said agreement he was bound to do. That said Olivia Crampton at her decease left surviving her four children by said Oscar P. Crampton, namely, John D. G. Crampton, Matilda Crampton, Benjamin E. P. Crampton & Oscar P. Crampton Jr. her sole heirs at law, all infants of tender age, and residing in said County.

That said Matilda Garrott, widow of John D. Garrott as aforesaid has hitherto failed & neglected to convey to your Orator said John E. Garrott, all her right of dower & title & interest whatsoever in the lands described in said "Exhibit B. as by her said agreement with your Orator she was bound to do. And your Orator charges that he is entitled to have conveyed to him all the right title, claim & interest whatsoever of the said Oscar P. Crampton, Matilda Garrott, & the said infant children heirs at law as aforesaid of the said Olivia Crampton in & to the lands mentioned and described in said Exhibit B." — But now so it is that your Orator is remediless without the interposition of your Honorable Court. — To the end therefore that the said Oscar P. Crampton, Matilda Garrott, John D. G. Crampton, Matilda Crampton, Benjamin E. P. Crampton & Oscar P. Crampton Jr. may answer the premises, and that a decree may be passed by your Honorable Court for the conveyance to your Orator, John E. Garrott of all the right, title, claim & interest whatsoever of the said defendants in & to the lands & premises mentioned & described in said "Exhibit B." and that a Trustee may be appointed to execute to your Orator a good and sufficient deed of conveyance thereof under such decree, and that your Orator may have such further or other relief as his case may require. — May it please your Honor to grant unto your Orator the writ of subpoena against the said Oscar P. Crampton, Matilda Garrott, John D. G. Crampton, Matilda Crampton, Benjamin E. P. Crampton & Oscar P. Crampton & commanding them to appear in this Court at some certain day to be therein named, to answer the premises, and to show cause if any they have why a decree should not be passed and a Trustee appointed as prayed, and to abide by & perform such decree as may be passed therein. — And as in duty bound &c. —

Jno. Ritchie Sol. for Complaint.

Exhibit A:

Maryland Frederick County Sct.

I, P. L. McLean Register of Wills for Frederick County, do hereby certify and attest, that on the 21st day of June 1863 Letters of administration were granted by the Orphans Court for Frederick County to John E. Garrott and Oscar P. Crampton on the Estate of John D. Garrott late of said County, decd the said John E. Garrott & Oscar P. Crampton having given bond with Francis Garrott & Matilda Garrott sureties in the sum of Nineteen thousand dollars, current money for the due performance of their said administration. — In testimony whereof, I hereunto set my hand & affix the seal of Office, this 29th day of September 1865. — Test. P. L. McLean Register of Wills for Frederick County.

Exhibit B:

At the request of Olivia Crampton the following deed was recorded April 17th 1865 —

This Deed made this 30th day of January in the year 1865, Witnesseth that Whereas John D. Garrott late of Frederick County was seized at the time of his death in fee simple of certain lands & tenements which upon his decease aforesaid descended to Matilda Garrott widow and relict and John E. Garrott & Olivia Crampton wife of Oscar P. Crampton sole heirs of said deceased, and whereas the said parties have concluded to hold & enjoy their respective parts thereof in severalty, therefore the said Matilda Garrott, John E. Garrott & Annie R. Garrott his wife, do grant unto Olivia Crampton wife of Oscar P. Crampton in fee simple all their respective rights, titles, claims, interests & demands in & the following described parcels of