Your Oratrix prays may be taken as a part of this her bill of Complaint as if here inserted in words & figures. — Your Oratrix further shows unto your Honor that said Isaiah W Zimmerman died leaving your Oratrix as his widow, and Chas Wesley, Alice Virginia and George Willis Zimmerman as his only children & heirs at law, all of whom are infants of tender years & reside in Frederick County; Your Oratrix still further shows unto your Honor that said Isaiah W Zimmerman being indebted to said Christian Rahter in the sum of one thousand dollars by his promissory note bearing date the first day of April 1863, the said Isaiah W. Zimmerman did together with your Oratrix, convey said real estate by mortgage bearing even date with said promissory note to said Christian Rahter, that said Christian Rahter did upon the 18th day of May 1863, assign said Mortgage to one Jacob Seizer, and said Jacob Seizer did upon the 18th day of April 1864 assign said Mortgage to one John D Crumbaugh, all of which will fully appear by reference to true & certified copy of said Mortgage & assignments, filed herewith marked Exhibit No 2 Your Oratrix still further represents that said real Estate is not susceptible of advantageous division among the heirs at law of said Isaiah W. Zimmerman & your Oratrix, but that it would be to the interest & advantage of all, infants as well as adults, to have said real Estate sold by a Trustee to be appointed by your Honorable Court, and the proceeds appropriated first to the payment of said Mortgage Claim of said John D. Crumbaugh & the balance distributed among the parties by law entitled to the same, and your Oratrix is willing and desires to receive such an allowance out of the proceeds of sale, in lieu of her right of dower in said real estate, as she is entitled to by law and to your Honor shall seem meet and fit. —

In tender Consideration whereof & for that your Oratrix is remediless in the premises by the strict rules of the Common law & relievable only in a Court of Equity where matters & things of this nature are properly cognizable. To the end therefore that the said Chas. Wesley Zimmerman, Alice Virginia Zimmerman, Geo. Willis Zimmerman and John D. Crumbaugh may answer fully and particularly all & singular the matters & things aforesaid; May it please your Honor to order & decree that said real estate may be sold by a Trustee to be appointed, and that your Oratrix may have such other & further relief in the premises as the nature of the case may require, and to your Honor shall seem just and right. — And may it further please your Honor to grant unto your Oratrix the State of Maryland's writ of subpoena to be directed to the said Chas Wesley; Alice Virginia and Geo Willis Zimmerman, and John D. Crumbaugh, all of Frederick County, thereby commanding them & each of them, to be and appear before your Honor on a day therein to be named, to answer all & singular the premises, and to stand to, abide and perform such order & decree therein as to your Honor shall seem just and meet. And your Oratrix will ever pray &c. —

Milton G. Urner
Solicitor for Complainants

Exhibit No 1

At the request of Isaiah W Zimmerman the following Deed was recorded April 21st 1863, stamped & Cancelled.

Exhibit No

This Deed made this thirty first day of March in the year Eighteen hundred & sixty three by Christian Rahter & Charlotte Rahter his wife of Frederick County in the State of Maryland of the one part and Isaiah W. Zimmerman of the County & State aforesaid of the other part. Witnesseth that in consideration of the sum of Six thousand six hundred & forty five dollars the said Christian Rahter & Charlotte Rahter his wife do grant unto the said Isaiah W. Zimmerman in fee simple the following described parcel of land lying in Mount Pleasant District and County of Frederick State of Maryland. — Beginning at a stone marked No 1 formerly planted at the end of the first line of "Spring Garden" and running thence North 60 degs. East 1 4/10 pts. to a stone South 18½ degs. East 50 pts. to a stone, North 85½ degs East 16 4/10 pts. to a stone South 20 degs. East 71½ pts. to a stone East 31½ pts to a stone at the South West corner of James Longs land thence binding on said Longs land, North 3¼ degs West 35 1/10 pts to a stone North 50 degrees East 7 pts to a stone, North 35 degs. East 10 pts. to a stone, North 20½ degs. East 9¼ to a stone at the South West corner of a lot of land conveyed by John Stauffer to Saml D Walker thence