or parcel of land being part of a tract called The Mountain tract situate and lying in Frederick County and in the division of Hoover's Lot designated No 3 containing nineteen and a quarter acres of land and particularly described in a deed from Jacob Hoover to said Elizabeth Hoover, as will more fully appear by reference to said deeds copies of which are herewith Exhibited marked Exhibits No 1 and 2 which your Complainant prays together with all other Exhibits hereinafter produced may be taken as part of this her Bill of Complaint. Your Complainant further states that the said Elizabeth Hoover being so seized and possessed, did, by deed dated on the 24 day of April in the year Eighteen hundred & sixty, convey to your Complainant Mary E Hoover as tenant in common the undivided half part of that part of a tract of land called "Pankhouse Hall", containing seventeen and three quarter acres of land more or less - which will more fully at large appear by reference to a copy of said deed herewith Exhibited marked Exhibit No 3 -

Your Complainant further states that the said Elizabeth Hoover being seized in fee of the Mountain Lot aforesaid, and your Complainant and the said Elizabeth Hoover being seized as tenants in common of the tract of land called "Sandsome Hall" as aforesaid, did by articles of agreement made and concluded on the first day of April Eighteen hundred and sixty four sell to Augustus C Hoover of the County and State aforesaid the land described aforesaid in Exhibits No: 1 and 2, filed in this cause upon the terms & stipulations contained in said Articles of Agreement all of which will fully appear by reference to said Articles of Agreement herewith Exhibited marked Exhibit No 4 and 5. - Your Complainant further states that the said Augustus C Hoover has paid to the said Elizabeth Hoover her share of the purchase money of said lands described as aforesaid, and that he is indebted to your Complainant by his promissory notes & single bills dated April first Eighteen hundred & sixty four, the first payable one year after date in the sum of Eighty four dollars with interest from date, - the second, payable two years after date for eighty three dollars with interest from date - the third payable three years after date for eighty three dollars with interest from date as will appear by reference to said promissory note and single bills herewith Exhibited marked Exhibits No 6, 7 and 8. - Your Complainant further states that the said Augustus C Hoover is still further indebted to your Complainant by his promissory note dated on the 29: day of October Eighteen hundred & sixty four in the sum of fifty three dollars fifty seven cents with interest from date as will appear by reference to said promissory note marked Exhibit No. 9.

Your Complainant states that notes Exhibited in said proceedings as Exhibit No. 6, 7 and 8 were given as part of the purchase of the land described in said proceeding as "Pankhouse Hall" and that said notes only bear interest at the rate of five per cent per annum as will appear by reference to the Articles of Agreement heretofore Exhibited, but not expressed in the body of said notes. - Your Complainant further states that the said Augustus C. Hoover has paid the entire purchase money for the lands aforesaid, except the sum of money specified in the Exhibits No. 6, 7 and 8 together with the interest due thereon - but has never received a deed therefore - and that the said sums of money & the interest due thereon, and the promissory note for the sum of fifty three dollars and fifty seven cents - together with the interest due thereon is still due & owing to your Complainant - Your Complainant further states that the said Elizabeth Hoover died intestate sometime in the month of September Eighteen hundred & sixty five without executing a deed for the land purchased & paid for as aforesaid & leaving the following children and grand children her heirs at law, viz:- John W Hoover a son, married Elizabeth Black & reside in the State of Penna Jacob Hoover a son, married Susan Fisher & reside in the State of Pennsylvania Augustus C. Hoover a son married Eliza Byers, died since his mother leaving a widow Eliza Hoover and the following children his heirs at law - Caleb Hoover, John Hoover, Anna Mary Hoover and Milton Wright Hoover, all of whom are infants under the age of twenty one years & who reside in the State of Pennsylvania, Lovinia Hoover a daughter of said intestate married to Frederick Recker, who she survived and resides in Frederick County State of Maryland, Magdalena Hoover a daughter married Nathaniel Fisher, she dead leaving two children her heirs at law, viz, John W Fisher and Elizabeth Sarah Ann Fisher both of whom are infants under the age of twenty one years =