situate in Frederick County, Maryland ~ one lot containing Eight acres and a lot containing four acres, and one Mountain lot of fifteen acres part of a tract called Pleasant Ridge, and the Household furniture; also all the stock in Saddler Shop and all debts due me by note or book account ~ the above bequeath shall be for the sole use and benefit of my wife so long as she may live, and after the death of my dear wife, the above described property shall be sold and equally divided among my dear Children share and share alike; all of which will fully and at large appear by reference to said last will and Testament, a true and certified Copy whereof is filed herewith as Exhibit No. ~ Which with all other Exhibits your Orators pray may be taken as a part of this their bill of Complaint as if here inserted in words and figures ~ that the said John Appleman died, seized and possessed of the real estate therein mentioned and which is more particularly described in the will and deeds of Conveyance, true and certified copies whereof are filed herewith as Exhibits No. 2, 3, 4, 5, 6, 7 and 8 ~ that the said John Appleman died leaving Nancy Appleman as his widow and Alpheus A. Appleman, Florella Brown, Rebecca H. Rudy, John P. Jardwin, Asbury G. S. Philip and William S. Appleman, as his only children and the devisees of said real estate on the death of their mother Nancy Appleman ~ that all of said children and devisees are adults, except Asbury G. S. Philip, and William S. Appleman, who are infants under the age of twenty one years and they all reside in the State of Maryland ~ that the said Nancy Appleman is getting old and unable to attend to said real estate ~ that said real estate will sell now for a better price than some years hence and if sold and the money invested, will yield a better income and a more comfortable support to said Nancy Appleman than the real estate does by renting and farming it ~ that the interest of all the parties interested, infants as well as adults will be promoted by having it sold and the money arising therefrom invested for the benefit of the widow during her life and distributed among said Children and devisees after the death of their mother, and that said widow is not only willing, but desirous that said real estate should be sold and the proceeds of sale invested for her benefit as aforesaid.

To Tender Consideration whereof and for that your Orators are remediless in the premises by the strict rules of the Common law and relievable only in a Court of Equity where matters of this nature are properly cognizable. To the end therefore that the said Nancy Appleman, Asbury G. Appleman, S. Philip Appleman and William S. Appleman may answer all and singular the charges and matters aforesaid and that said real Estate may be sold and the proceeds of sale invested for the benefit of the parties interested under the will of John Appleman dec^d and that your Orators may have all such other & 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 Orators the State of Maryland's writ of Subpoena to be directed to the said Nancy Appleman, S. Philip Appleman & William S. Appleman of Frederick County and Asbury G. Appleman of Washington County thereby commanding them and each of them to be and appear before your Honor on a certain day therein to be named, to answer all and singular the premises and to stand to, abide and perform such order and decree therein as the nature of the case may require and to your Honor shall seem meet and your Orators will ever pray &c. Grayson Rohrbaugh
Solr for Complainants

Exhibit No. 1

In the name of God, ~

I, John Appleman of Frederick County State of Maryland, being in ill health in body but of sound and disposing mind, memory and understanding, considering the certainty of death and the uncertainty of life, ~ I do therefore make and publish this my last will and testament in manner following ~

First and principally I commit my soul to God, and after all my debts are paid, I give and bequeath unto my dear wife all my real and personal estate for her sole use and benefit