

and leaving unsold about 722 or more acres of land  
 subject to the trusts specified in said testament and last  
 will of said Peter Shinnier dec<sup>d</sup> as appears by Copies of the  
 deeds of conveyance from said Abraham Jones to the said  
 purchasers registered as Nos 4, 5, 6, 7, 8 and the Complainants  
 charge that they are entitled to have the said real estate  
 remaining unsold by the said trusts conveyed by him  
 or his heirs to them and to their surviving sisters and  
 brother aforesaid and to the said children of their said  
 deceased sister Juliana M Doney according to the terms  
 and provisions of the said testament and last will as tenants in  
 common in fee simple but they charge that the said Abraham  
 Jones is dead that during his lifetime he was seized of  
 only a naked legal estate in the said lands as trustee  
 without being entitled to any beneficial interest therein  
 that John Jones is the eldest son of the said Abraham Jones  
 and would have been his heir if the Acts of Assembly of  
 1786 Chapter 24 & 1820 Chapter 191 to Ancestral descent had not  
 passed and that to be as such according to the acts of  
 Assembly in such case made and provided both descended the  
 aforesaid naked legal estate created and vested in the said  
 Abraham Jones in and by the said testament and last  
 will of the said Peter Shinnier dec<sup>d</sup> and said Complain-  
 ants further charge that even were the legal estate in  
 the said lands now vested in the said certain trusts  
 it would be to the interest and advantage of all parties  
 to have the same sold and that the said real estate  
 is incapable of a fair equitable and advantageous par-  
 tition or division amongst the said certain trusts  
 and that it would be to the interest and advantage  
 of all the said parties Complainants and Defendants  
 adults and infants to have the said real estate sold  
 under the direction of this Court and the proceeds of  
 such sale distributed amongst the said parties according  
 to the just and equitable rights of each under and by  
 virtue of the said testament and last will of the said  
 Peter Shinnier dec<sup>d</sup> and the said Bill further states that  
 the said Stephen Doney, Aaron J. Baker and Maria L.  
 Baker his wife Julia Doney, Brian Doney, John  
 Peter Lawrence and Frances his wife and John Doney  
 are all non residents of this state and beyond the  
 jurisdiction of this Court and the Complainants Charles  
 A. & Stephen D. Lawrence further charge that since  
 the death of their said Mother they have for a valuable  
 consideration purchased from their said sister Ann  
 Ann and at her Special Solicitation her entire interest  
 of every nature and kind in the property real & person-  
 al mentioned or derived in trust by the will of her