

The Bill of Complaint of Joseph Witt, respectfully sheweth to your Honor that a certain Woodward Witt in his last will & testament made and executed in due form of law his last will & testament wherein among other things he devised and bequeathed as follows I give and devise to my son Joseph during his natural life in trust for the education & maintenance during their minority of his children the use & benefit of my house fronting on Patrick Street in Frederick now in the occupancy of Strickton & Stokes as a stage office together with the portion of ground in the rear thereof running back to Church Street and embracing the back house fronting on Church Street now occupied by George W. Sharpe as a printing office and at the death of my said son Joseph Witt I give & devise the said premises to his children and the said Woodward Witt soon after departed this life without having in any manner revoked said last will & testament which was duly admitted to probate & recorded among the will records of Frederick County as well appear by a true & certified extract from said will herewith filed marked Exhibit A which with all other exhibits your orator prays may be taken as a part of this bill of Complaint as if here inserted in words & figures. Your orator further sheweth that he is the son of said Woodward Witt named in the above recited clause of said will & that he has the following named children who upon the death of your orator will be entitled to said property Mrs. Harriet M. Witt Mary M. who has intermarried with Robert McDonald Elizabeth M. who has intermarried with John A. Stoney Thomas M. Witt and Ann Cecilia Witt Your orator further states that the said property is located on the north side of Patrick Street in Frederick being the eastern half of the western half of Lot No. 65 on the plat of Frederick town the improvements of which consisted of an old & dilapidated building on Patrick Street & a small Smith shop on Church Street the former of which yielded the principal part of the income derived from said property and that said house on Patrick Street has lately been consumed by fire thus leaving said property almost wholly unproductive and that said property is particularly described in the deed from John Whellman to aged Woodward Witt a true & certified copy whereof is herewith filed as Exhibit B. Your orator further states that it will be for the interest of all parties to have said property sold & the proceeds invested under the direction of your Honor by a trustee to be appointed for that purpose as the money thus invested will yield more than