

of Certain lands in said County containing about six and three quarters acres more or less and which the said Reginald Baldwin acquired by deed of a certain Willcent making duly executed about the 22^d day of April, in the year 1851 and which was duly recorded on the fourth day of June of said year in Libr. C. D. N^o 12 folio 3872e a copy of which legally authenticated is herewith exhibited marked A and which your orators and oratrices humbly pray may be gathered with all other exhibits that may hereafter be made by them be taken and considered as a part of this their Bill of Complaint. and the bill of Complaint of your orators and oratrices further humbly shews that the said Reginald Baldwin at the time of his death left surviving him his wife Grace Baldwin who is since deceased - having died in the early part of the month of April in the year 1859 and the following Children to wit: Thomas Baldwin Elizabeth married to Zachariah Shaw Susan B married to Patrick Henry Lough which said Patrick Henry Lough died about the month of January in the year 1850 William Baldwin Samuel Baldwin John Baldwin Lydia married to James Fulton and Ann married to William Moberly which Ann died about the year 1852 and since the death of said Reginald Baldwin all of which said survivors are of full age and further that the said Ann died leaving a child by her said husband William Moberly named George Moberly who is an infant and a resident of said Frederick County and the defendant in this cause. The Bill of Complaint of your orators and oratrices further humbly shews and says said orators and oratrices charge and declare that the aforesaid lands of the said Reginald Baldwin are incapable of beneficial partition amongst the parties aforesaid and cannot be managed as they are at present to the advantage of the said persons therein and that it will be of great benefit to all interested infant as well as adults, that the said lands be sold and the proceeds divided among the parties entitled according to their respective shares and that your orators and oratrices hereby expressly crave all right whatsoever of and partition given them by the acts of Assembly of this State or which they may in any way possess. But pray so it is that your orators and oratrices are unwilling in the premises except through the intervention of your Honorable Court. So the end therefore that the said lands of the said Reginald Baldwin deceased with their improvements and appurtenances may be sold by a decree of your Honorable Court at such time and on such terms as your Honorable Court shall direct and that a suitable trustee be appointed for that purpose who shall report the same to this Court for its ratification and such other orders as your Honorable Court shall see fit to pass and that the proceeds be divided among the said persons as they may be entitled and that the said George Moberly