

Among other were the following proceedings to wit  
 Henry A. Paddicord + Mary E. Paddicord his wife } By it remembered that hereinafter  
 Sarah M. Mercer et al } to wit on the 24th day of May  
 1859 came the said Henry A. Paddicord et al up Court here  
 setting by John A. Lynch Solicitor  
 and filed in Court here the  
 following Bill and Exhibits:

By the Honorable Mr. Nelson Judge of the Circuit Court for Frederick's County as a Court of Equity  
 The Bill of Complaint of Henry A. Paddicord and Mary E. Paddicord his wife of Frederick's County Maryland humbly shews unto your Honor that Henry D. Mercer late of said County departed this life intestate sometime in the month of February in the year 1857 leaving a widow Rachael B. Mercer who died in the month of February in the year 1859 that the said Henry D. Mercer left one of your complainants the said Mary E. Paddicord + Sarah M. Mercer - Copies of Mercer Samuel B. Mercer Charlotte Mercer and Anne M. Mercer his only children and heirs at law - all of whom reside in said Frederick's County and are all infants under age except the said Mary E. Paddicord who is over twenty one year of age

That said Henry D. Mercer did seize and possess in fee of the real property mentioned & described in a deed from Samuel Baker + wife to said Henry D. Mercer and also of the real property mentioned and described in a deed from Isaac Bowen Trustee to said Henry D. Mercer certified Copies of which deeds are herewith filed marked Exhibit A. and Exhibit B. both of which your complainants pray may be taken and considered as a part of this their Bill of Complaint

And your Complainants further shew and declare that the said real estate property is not susceptible of partition among the parties aforesaid and that it will be greatly to the interest and advantage of all the parties interested the said infants as well as your Complainants that said real property be sold and the proceeds divided amongst the parties entitled to the same according to their respective interests.

And your Complainants hereby expressly waive all and every right of partition + election given by the act of Assembly of the year 1820 Chapter 191. But prays it is that your Complainants are enabled except by the aid of your Honor's Court

So they pray therefore that the said Sarah M. Mercer Henry A. Paddicord + Mary E. Paddicord Samuel B. Mercer Charlotte Mercer and Anne M. Mercer may answer the premises and that a decree may be passed for the sale of the said real property