

with Thomas Jones and James De Derrida who died in Michigan some three or four years ago leaving a widow and one child, but your Orator is advised that both dying before the death of said Rosanna their heirs and representatives are not entitled under the said deed of trust

And your Orator charges that by the said deed of trust he is entitled, as he is advised, to one half of the proceeds of the sale of the said real estate, but that without the aid of your honorable Court your Orator is remediless in the premises.

In the end therefore that a new Trustee may be appointed by your Honor to carry out perform and execute the provisions of the said of trust, and that your Orator may obtain and receive, by the decree of your Honor his said one half equal part of the said proceeds of sale of the real estate aforesaid and that the said Mary Oates and John Oates her husband, and that the said Margaret Flanigan & John Flanigan may answer the premises as fully as if the same were herein set forth, and they were thereto specially interrogated, and that a decree may be passed appointing a new trustee and directing the sale of the real estate aforesaid, and the distribution of the proceeds as hereinbefore prayed, and that your Orator may have such other and further relief as his case may require. May it please your honor to grant to your Orator the writ of subpoena against the said Mary Oates & John Oates Margaret Flanigan and John Flanigan commanding them to appear in this court, at some day to be therein named to answer the premises and abide by & perform such decree as may be passed therein & as in duty bound he

James M. Sherry
Solicitor for Complainant

At the request of Thomas Flanigan the following Deed is recorded January 30th 1888

Deed
This indenture made this twenty eight day of January in the year of our lord one thousand eight hundred and thirty three, between
Jacob Michael and Rachael Michael his wife of Frederick County in the State of Maryland of the one part and Thomas Flanigan of the County and State aforesaid of the other part. Witnesses that the said Jacob Michael & Rachael Michael his wife for and in consideration of the sum of seven hundred Dollars, current money of the United States, to them in hand paid by the said Thomas Flanigan, he has and receives, before the sealing and delivery of these presents the receipt whereof they the said Jacob Michael and Rachael Michael his wife do hereby acknowledge, have granted bargain sold aliened, conveyed and confirmed and by these presents do grant bargain sell alien, convey and confirm unto the said Thomas Flanigan his heirs and assigns all the following described lot or parcel of land situate lying and being in the County and State aforesaid beginning in East Street at the end of the lot of the late Andrew Helmer and the heirs of the late Col. Baker Johnson and running with East Street South one