

brother the said Peter Beard to wit:

George Holter married to Mary Koblenz, Susan Poole widow of Hanson Poole, William H. Holter married to Elizabeth Koblenz, Samuel G. Holter, Peter Holter, married to Mahala Koblenz, Sarah Holter, Mary Senaf widow of John Senaf and Elizabeth now widow of John Amis ~

Your Complainants further state that all of the decedents named heirs of said Peter Beard deceased, and residents of Frederick County State of Maryland, except Edward Beard who is a resident of the State of Iowa, John Alexander Beard who is a resident of the State of Virginia, Peter A. Beard, who is a resident of the State of California, and James Guy Elder Beard who is a resident of the State of Ohio ~

And your Complainants aver and charge that the said lands and tenements cannot be divided without loss or injury to the parties interested, and that the interest and advantage of all parties interested would be promoted by a sale thereof under a decree of this Court, and a division of the money arising from the sale thereof among the parties according to their respective rights. ~

It is the pnd therefore that the defendants herein after named, may answer the several matters and things charged in this Bill of Complaint, and that a decree may be passed for the sale of the real Estate in the proceedings in in this Cause mentioned, and that the proceeds of such sale may be divided under the order of the Court among the parties according to their respective rights, and that your Complainants may have all such other and further relief in the premises as the nature and Equity of their case may require. ~

May it please your Honor to grant to your Complainants an order of publication against Edward Beard, John Alexander Beard, Peter A. Beard, and James Guy Elder Beard, who are non residents, as aforesaid, giving them notice of the substance and object of this Bill, and warning them to appear in this Court in person or by solicitor, on or before a certain day to be therein named, to answer the premises and show cause, if any they have, why a decree ought not to pass as prayed; and also a subpoena against Joshua Zimmerman and Margaret Zimmerman his wife of Frederick County State of Maryland, commanding them to appear in this Court at some certain day to be therein named, to answer the premises, and abide by and perform such decree as may be passed therein, and as in duty bound your Complainants will ever pray &c. ~

Filed April 28th 1848

Wm. Ross
Chas. W. Ross

Solicitors for Complainants

Exhibit 1.

This Adventure made this Fifteenth day of Dec^r in the year of our Lord One Thousand Eight hundred and forty seven, between John DeGrange, Justice as hereinafter named, of Frederick County and State of Maryland of the one part, and Abraham Beard of the County and State aforesaid of the other part: Whereas by a decree of the Frederick County Court, sitting as a Court of Chancery, bearing date, the tenth day of May 1847 passed and made in a cause in said Court depending; Whereas John DeGrange and wife, and Catharine Robt were Complainants, and Mary Kennedy, Henry Runner, Michael Runner and others were defendants, and numbered 2091, on the Equity Docket of said Court, the above named John DeGrange was appointed Justice, and authorized and empowered to sell the real estate of Daniel Runner late of Frederick County deceased, for the purposes therein set forth,