

gross sum of Two thousand dollars - And upon the following terms - One thousand dollars to be paid on or before the first day of April in the year Eighteen hundred and sixty eight, and One thousand dollars to be paid on or before the first day of April in the year Eighteen hundred and sixty nine, the whole of said sum of money to bear interest from the first day of April in the year Eighteen hundred and sixty eight - That the land is sold, upon the terms aforesaid, as part of a tract of land called "The Sawney or Holes Cabin" containing twenty acres of land, and which said land is particularly described in a deed (not executed) from the said Abraham Skinner to the said Samuel Young, and in a plat of said land, made by John S. Kapp, Esq, herewith Exhibited marked Exhibits 1 & 2, which your Complainant prays may, together with all other Exhibits hereinafter produced may be taken and considered as part of this his Bill of Complaint, the same as if set forth in words and figures. -

Your Complainant further states that in compliance with the terms of said sale the said Samuel Young paid to your Complainant in money and work done for your Complainant the sum of three hundred and ten dollars and forty three cents in part of the purchase money for the land sold as aforesaid. -

Your Complainant further charges, that the said Samuel Young from the date of the sale of said land sometime in the month of September or October, in the year Eighteen hundred and sixty seven, took possession of the said land - and from that time exercised acts of ownership and control over said land, and continued in possession of said land up to the day of his death. -

Your Complainant further charges, that the said Samuel Young died intestate, sometime in the month of February in the year Eighteen hundred and sixty eight, seized and possessed of the land aforesaid, and leaving a widow named Susan Young then surviving, and the following children his heirs at law - viz, 1<sup>st</sup> Mary M Young, 2 John M Young, 3 Samuel David Young, 4 Sarah L Young, 5 Susan E Young, 6 Margaret A Young, 7 Ida F Young, 8 Sophia Young, 9 William P Young, all of whom are infants under the age of twenty one years, and all of whom reside in Frederick County Maryland. -

Your Complainant further charges that of the purchase money for said land there is now due and owing to your Complainant, the sum of six hundred and eighty nine dollars and fifty seven cents with interest from the first day of April Eighteen hundred and sixty eight - Not yet due - but owing to your Complainant as part of the purchase money for the land sold as aforesaid. -

Your Complainant further charges, that the said land cannot be divided or sold in parcels, to pay that portion of the debt due and owing to your Complainant without injury to said property. - Wherefore your Complainant prays that a decree may be passed for the sale of the whole of said land, and that the whole of said debt be raised and payed out of the purchase money thereof. -

To the end therefore that the Defendants herein after named may answer the several matters and things herein before stated, the same as if they were herein against questioned and they were severally specially interrogated, and that the lands in the proceedings mentioned may be sold for the payment of your Complainant's Claim, both that part thereof which is now due and owing, and that part thereof which is not yet due, but owing to your Complainant, together with the interests due thereon - And that your Complainant may have such further and other relief as the nature and Equity of his Case may require. -

May it please your Honors to grant unto your Complainant the writ of Subpoena against the said Susan Young, Mary E Young, John M Young, Samuel David Young, Sarah L Young, Susan E Young, Margaret A Young, Ida F Young, Sophia Young and William P Young of Frederick County, 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 decrees as may be passed therein, And as in duty he -

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