

Bill

To the Honorable the Judges of the Sixth Judicial Circuit of the State of Maryland sitting in the Circuit Court for Frederick County, as a Court of Equity.

The Bill of Complaint of John W. Diehl and Hannah Diehl his wife and Anne E. Pouty of Frederick County, State of Maryland respectfully shew to your Honors. — That a certain George Pouty late of Frederick County, State of Maryland, died intestate, sometime in the month of January in the year Eighteen hundred and sixty eight — seized and possessed of a large and valuable real estate situate in Frederick County, State of Maryland — being part or part of the following named tracts or parts of tracts of land, part of a tract of land called "The Reservoir on Hunting Lot", part of a tract of land called "The Reservoir on Spring Garden", and part of a tract of land called "Long Ridge" — or by whatsoever name or names the same may be called, containing Two hundred and fifty acres of land more or less, and particularly described in the deeds of John Pouty and wife, Henry Booker and wife, Jared Stonifer and wife, William Diehl and wife, Upton K. Walty and wife, Jared Stonifer and Mary his wife, Solomon Schaeffer & wife, John W. Diehl Trustee, and Solomon Biddinger and wife to said George Pouty. — Except such parts thereof described in said deeds, as the said George Pouty sold and conveyed in his life time to different parties, Copies of which said deed are herewith Exhibited Marked Exhibits Nos. 1, 2, 3, 4, 5, 6, 7, 8 & 9, which your Complainants pray together with all other Exhibits hereinafter produced may be taken and considered as part of this their bill of Complaint, the same as if set forth in words and figures.

Your Complainants further state, that the said George Pouty died intestate as aforesaid leaving a widow named Catherine Pouty him surviving, and the following Children, his heirs at law viz:

- 1st Hannah Diehl then the wife of John W. Diehl and one of your Complainants
 - 2^d Sarah (Married to Daniel K. Saylor of Carroll County State of Maryland)
 - 3^d Elizabeth Married to William H. Renner and reside in Frederick County
 - 4th Anne E. Pouty, a daughter, who resides in Frederick County
 - 5th Martha Pouty a daughter, who resides in Frederick County
 - 6th Ida Pouty a daughter who resides in Frederick County
- All of whom are adults except Martha Pouty and Ida Pouty, who are infants under the age of twenty one years.

Your Complainants further state that the said Real Estate cannot be divided without loss or injury to the parties interested, and that it would be to the interest and advantage of all the parties interested, that the said lands be sold under a decree of the Court and the proceeds of sale divided among the parties according to their respective rights.

To the end therefore that the Defendants hereinafter named, may answer the several matters and things herein contained, the same as if they were herein again repeated, and they were thereunto specially interrogated, and that the real estate in said proceeding mentioned, may be sold, and the proceeds of said sale divided among all the parties interested according to their respective rights, and that your Complainants may have such further and other relief in the premises, as the nature and Equity of their Cause may require.

May it please your Honors to grant unto your Complainants, the writ of Subpoena against the said William H. Renner and Elizabeth Renner