

To the Honorable, Messrs John A. Leypold and Wm. D. Bowie Judges of the said judicial Circuit of the State of Maryland, sitting as a Court of Equity for Frederick County ~

The Bill of Complaint of Charles W. Todd, Rachel Todd and Margaret Todd his wife, Upton Brown and Ellen Brown his wife, J. E. Tucker and Rachel R. Tucker his wife, Ann Jeanette Todd, James F. Thompson and Margaret Thompson his wife, Benjamin W. Todd, William Cornwel, and Martha C. Cornwel his wife, Samuel R. Todd, Assignee of Samuel Todd, Peter Davis and Mary E. Davis his wife, Charles W. Brungle, J. Adams and Susan Adams his wife, Rachel Brungle, Geo. W. Todd, J. R. Hollum and Mary Hollum his wife, J. Duxton and Sarah Duxton his wife Henry Johnson and Susan Johnson his wife, and James H. Brown; heavily shew. ~

That heretofore a certain Benjamin Todd, late of Carroll County deceased, was in his lifetime seized and possessed of certain Real Estate lying and being in Frederick County, and adjoining Counties in the State of Maryland, and among other, the following tracts or parcels of land, to wit: A parcel of land situate near New Market, in Frederick County, containing Eight and one quarter acres, more or less, being the same lot or parcel of land heretofore conveyed, to the said Benjamin Todd by Harry Leuckett, as will more fully appear large appear, by reference to copy of deed of conveyance herewith filed, and marked, Exhibit H. L. which Exhibit together with all other Exhibits herewith filed, your Orators and Oratrices pray, may be taken and considered as a part of this their Bill of Complaint. ~

1<sup>st</sup> ~ A house and lot in Ridgeville in Carroll County on the Frederick and Baltimore Turnpike Road. ~ The lot containing about one square acre of land more or less, it being the same parcel of ground heretofore conveyed, to the said Benjamin Todd by deed from William Hobbs of said, which will fully appear by reference to a copy of said deed of conveyance herewith filed, marked, W. H. No. 1. ~

2<sup>nd</sup> ~ A lot of about one square acre of land, with buildings and improvements thereon situate in Ridgeville Carroll County Maryland, being part of the lot conveyed to the said Benjamin Todd, by William Hobbs of said, and a part of the lot or parcel of land heretofore conveyed to the said Benjamin Todd, by deed of conveyance, from Margaret Collins, to a copy of which deed herewith filed, marked "Exhibit M. C." reference is hereby made and had. ~

3<sup>rd</sup> ~ Two acres of land, more or less, with dwelling house and office, situate in Ridgeville aforesaid, being the same lot and parcel of land heretofore conveyed to the said Benjamin Todd by deed of conveyance from William Hobbs Sr. which will more fully appear by reference to a copy of said deed of conveyance, herewith filed and marked "Exhibit W. H. No. 2." ~

4<sup>th</sup> ~ The last residence of said deceased, situate in the said Village of Ridgeville, together with the farm adjoining, containing One hundred acres of land more or less. ~ Your Orators and Oratrices shew unto your Honors, that the said Benjamin Todd, was equitably, but not legally seized of this last lot or parcel of land, he never having received a deed of conveyance for the same, nor in fact had he the said Benjamin Todd, ever paid the whole of the purchase money therefor, but according to the best information of your Orators and Oratrices, there is now due and owing of the purchase money for said farm, the sum of seventeen hundred dollars, which your Orators &c, are advised is a lien upon said lot, tract or parcel of land. ~

And your Orators and Oratrices, further shew, unto your Honorable Court here, that the said tract of land No. 5. herein mentioned, was purchased by the said Benjamin Todd of John C. Duval, Trustee, in No. 843 Equity in the Circuit Court for Carroll County, to sell the Real Estate of William J. Duval, late of Carroll County, deceased, as will fully appear by reference to a copy of the decree of said Court, and Copy of the Report of said Trustee, filed herewith, marked Exhibits W. C. D. Nos 7 & 8. Appointing the said John C. Duval