Joseph D. Anders et al.
vs
Salma Beard, Peter Beard et al

No 3487. Equity ~
In the Circuit Court for Frederick County in Equity ~
May Term 1869 ~

Be it remembered that heretofore, to wit: On the 25th day of August, in the year of Our Lord One thousand Eight hundred and Sixty Nine; Came the said Joseph D. Anders et al. in Court here sitting as a Court of Equity, by their Solicitor, James H. Pearre, Esq and filed here the following Bill and Exhibits named therein. ~

Bill

To the Honorable the Judges of the Sixth Judicial Circuit of the State of Maryland, Sitting in Equity in the Circuit Court for Frederick County. ~

The Bill of Complaint of Joseph D. Anders, Andrew Anders, Susanah Anders and Andrew Anders Jr., all of Frederick County and State of Maryland humbly shows: That heretofore a Certain Adam Anders, late of Frederick County deceased, was in his life time seized and possessed of Certain real estate lying and being in said County, as will more fully appear by reference to deeds of Conveyance herewith filed Marked "Exhibits" Nos. 1, 2 & 3, And being so thereof seized and possessed, some time in the year 1834 or 1835, departed this life intestate, leaving the following Children and Heirs at Law, to wit: William Anders, Andrew Anders, George Anders, Salma Anders, who married Peter Beard, Elizabeth Anders Eliza Anders, Catharine Anders, who married Charles Clauly of the State of Ohio, Anna Christiana Anders, who married William Fogle, and Mary Anders who married William Bostian, ~ And your Orators Charge that since the death of their said Father, two of the said Children, to wit Elizabeth and Eliza have died intestate, leaving their brothers and sisters their only Heirs at Law ~

And your Orators further charge that the said Adam, at the time of his death left a widow by name Christina, who has also departed this life ~

And your Orators further charge, that Mary who married William Bostian, by a deed of Conveyance, her husband joining her, Conveyed all her right title and interest in and to said real estate to her brother William Anders, as will fully appear by a reference to a Copy of said deed herewith filed marked "Exhibit No 4". ~

And your Orators further charge, that Catharine who married Charles Clauly of the State of Ohio, by a like deed of Conveyance, Conveyed her interest in said land, to her brother William Anders, also as will appear by reference to a Copy of said Conveyance, herewith filed and Marked Exhibit No 5.

And your Orators further charge, that Christiana Anders who married William Fogle, and George Anders and wife, by their respective deeds of Conveyance, Copies of which are herewith filed and Exhibited, marked "Exhibit No 6" ~ and "Exhibit No 7", Conveyed to their brother Andrew Anders, all of their respective rights and interests in and to the lands aforesaid so that the said William Anders and Andrew Anders were each seized and possessed of three undivided seventh part of the said real estate, and their sister Salma who married Peter Beard, was seized and possessed of the One undivided seventh part of said lands. ~

And your Orators further charge, that since the aforesaid purchase by the said William, to wit: some time in the year 1864, the said William Anders departed this life intestate, seized and possessed as aforesaid, leaving the following Children his only Heirs at Law to wit, Susannah C. Anders, Andrew Anders & Joseph D. Anders, all of whom, are of full and lawful age, and having