

Honors that a certain John J. Willson of Frederick County died intestate sometime in the Month of August, in the year Eighteen hundred and seventy seized and possessed of valuable real estate, situate and lying in Frederick City State of Maryland, and particularly described in the deed from Basil Norris and wife to the aforesaid John J. Willson deceased and Recorded in in Liber H. S. No 15 folio 228 &c. One of the Land Records of Frederick County, State of Maryland, and in a further deed from William J. Ross, to the same John J. Willson deceased and recorded in Liber H. S. No 8 folio 275 &c one of the Land Records of Frederick County, State of Maryland as will appear by certified Copies of said deeds herewith Exhibited Marked Exhibits Nos. 1 & 2 which your Complainants pray, together with all other exhibits herein after 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 charge that the said John J. Willson died intestate as aforesaid charged, leaving a widow by the name of Anna J. Willson him surviving, who is entitled to a dower interest in said property, and the following Children, his Heirs at Law to whom the real estate herein before described, descended to as tenants in Common, viz Anna J. Willson, Adelyn B. Willson, Harriet M. Willson, Mary E. Willson, John J. Willson, Eleanor J. Willson, Tyler B. Willson, Anne C. Willson and Bradley J. Willson, all of whom are adults except Eleanor J. Willson Tyler B. Willson, Annie P. Willson and Bradley J. Willson, who are infants under the age of twenty one years, and all of whom reside in Frederick City. ~

Your Complainants further charge that the said property, cannot be divided without loss and injury to the parties interested, and that it would be to the interest and advantage of all concerned, that the real estate in the proceedings mentioned, be sold and the proceeds of sale divided amongst the parties interested. ~

To the end therefore that the said Anna J. P. Willson, Eleanor J. Willson Tyler B. Willson, Annie P. Willson and Bradley J. Willson may answer the several matters and things herein before charged, the same as if they were herein again repeated, and they were thereunto specially interrogated, and that the real estate in the proceedings mentioned may be sold and the proceeds of sale be divided amongst the parties according to their respective interests, and that your Complainants may have such other and further relief as the nature and Equity of their case may require. ~

May it please your Honors to grant unto your Complainants the writ of Subpoena against the said Anna J. P. Willson, Eleanor J. Willson, and Bradley J. Willson of Frederick City, commanding them to appear in this Court on 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 &c ~
Filed Seph. 1st 1870

Robert Stokes
Solicitor for Complainants

Exhibits

This Indenture made this 18th day of May in the year of our Lord 1839 - between Basil Norris and Jane his wife of Frederick County in the State of Maryland of the one part, and John J.