

Your Complainant further states that the said Mary Ellen Horsey, constituted and appointed her brother residuary legatee and Executor of her said last will, all of which matters will more fully and at large appear, reference being made to a copy of said will duly certified and herewith Exhibited marked Exhibit No. 1 which with all other Exhibits hereinafter produced, Your Complainant prays may be taken as part of this her Bill of Complaint. ~

Your Complainant further states that the said Mary Ellen Horsey died as before stated, without having revoked her said will hereinbefore Exhibited - And that letters testamentary on the Estate of said Mary Ellen Horsey were duly granted by the Orphan's Court for Frederick County, to Oatenbridge Horsey the Executor named in said Will, who has filed his approved bond, and entered upon the duties of his said Office. ~

Your Complainant further states that the said Mary Ellen Horsey at the time of her death, was seized and possessed in fee simple, of one undivided moiety of all those lands, situate in Frederick County State of Maryland, formerly the Estate of her Mother Eliza D. Horsey, and which lands were devised by the will of said Eliza D. Horsey to her son Oatenbridge Horsey, and Mary Ellen Horsey the above named Testatrix in fee simple to be divided as therein directed, and which devise was never legally executed - And that by a Codicil to her will, the said Eliza D. Horsey revoked the devise of one moiety of her lands to said Oatenbridge Horsey, and devised the portion intended for said Oatenbridge Horsey, to his wife Anna Horsey, all of which matters will more fully and at large appear, reference being made to a certified copy of the Will and Codicil of said Eliza D. Horsey, herewith exhibited Marked Exhibit No. 2. ~

Your Complainant further states that the personal Estate of the said Mary Ellen Horsey is wholly insufficient for the payment of her debts, and that a sale of the real Estate whereof said Mary Ellen Horsey died seized and possessed, will be necessary to discharge the debts owing by her. ~

Your Complainant further states, that George Carroll Horsey, Eliza Lee Horsey, and Mary Ellen Horsey, are infants under the age of twenty one years, and that Eliza Lee Horsey and Mary Ellen Horsey reside in Frederick County Maryland, and that George Carroll Horsey now resides in the City of Paris France and without the limits of the United States and its Territories, and beyond the reach of the process of this Court. ~

It is the said therefore that the said defendants hereinafter named may answer the several matters and things hereinbefore stated, as fully and particularly as if they were herein again repeated, and the said defendants were especially thereto interrogated, and that the land and premises hereinbefore mentioned, or so much thereof as may be necessary for the purpose, may be sold for the payment to your Complainant of her debt and interest, and to the payment of the Claims of all other Creditors of said Mary Ellen Horsey, whose Claims are unsatisfied, and that your Complainant may have all such other and further relief in the premises as the nature and Equity of her Case may require.

May it please your Honors to grant to your Complainant, an order of publication giving notice to the said George Carroll Horsey, who is a non resident as aforesaid stated, of the substance and object of this Bill, and warning him to appear in this Court in person or by guardian, on or before a certain day to answer the premises and show cause if any he has, why a decree ought not to pass as prayed, and also a writ of subpoena against Oatenbridge Horsey Executor of the last Will of Mary Ellen Horsey, Oatenbridge Horsey, in his own right as devisee for life and as residuary devisee, Eliza Lee Horsey, Mary Ellen Horsey and Eliza Lee Mitchell, of Frederick County State of Maryland, commanding them to appear in this Court, by a certain day to be therein named, to

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