

and Eveline R. Staley, who are infants under 21 years of age, all of Frederick County in the State of Maryland, humbly shows, that heretofore the said Charles W. Staley, Simon M. Staley, Susanna E. Staley, Daniel Adam Staley and Reuben R. Staley, since intermarried with Mark C. Carpenter, were seized as tenants in common of certain real estate lying and being in Frederick County, and which was conveyed to them by a certain John Adam Staley and Ann Rebecca Staley his wife, by deed bearing date the 11th day of February in the year One thousand Eight hundred and fifty one, and recorded in Liber N. B. 3 No 13 folio 131, One of the land Records of Frederick County as will more fully appear by a copy of said deed herewith filed marked Exhibit "A" and which is prayed to be taken and considered as part of this Bill of Complaint, together with all other Exhibits hereafter filed. ~ That sometime in the year One thousand Eight hundred and Sixty three, the said Simon M. Staley died intestate, leaving as his only heirs at law, his brothers and sisters the said Charles W. Staley, Reuben R. Carpenter wife of Mark C. Carpenter, Susanna E. Staley, and Daniel Adam Staley Calvin J. Staley and Eveline R. Staley, who are infants under 21 years of age.

That the said Charles W. Staley, Reuben R. Carpenter wife of Mark C. Carpenter, Susanna E. Staley and Daniel Adam Staley, Calvin J. Staley and Eveline R. Staley, who are infants under 21 years of age, are now seized as Tenants in common in fee of the Real Estate named in the Exhibit herewith filed as Exhibit "A", the four fifths part thereof belonging to the said Charles W. Staley, Reuben R. Carpenter wife of Mark C. Carpenter, Susanna E. Staley and Daniel Adam Staley, who is an infant under 21 years of age, as purchasers from John Adam Staley and Ann Rebecca Staley his wife, and the remaining one fifth thereof, belonging to Charles W. Staley, Reuben R. Carpenter wife of Mark C. Carpenter, Susanna E. Staley and Daniel Adam Staley, Calvin J. Staley and Eveline R. Staley, who are infants under 21 years of age, as heirs at law of said Simon M. Staley deceased. ~

And your Complainants charge that said real estate is not susceptible of division or partition among the parties aforesaid with advantage to them, and that your Complainants are entitled to have the same sold and the proceeds thereof distributed among said parties in proportion to their respective interests. ~

And your Complainants further charge that it will be for the interest and advantage of the said infants Daniel Adam Staley, Calvin J. Staley and Eveline R. Staley, and also of all the other parties to sell the aforesaid Real Estate, and to divide the proceeds thereof as aforesaid, and your Complainants are advised that a sale thereof can not be had without the assistance of this Honorable Court. ~

To the end therefore that the said Real Estate may be sold under the directions of your Honors, and that the proceeds thereof may be divided among the parties aforesaid in proportion to their respective interests, and that your Complainants may have such further and other relief in the premises as in equity they may be entitled thereto, May it please your Honors to grant unto your Complainants the Writ of Subpoena directed to Mark C. Carpenter Reuben R. Carpenter his wife, Susanna E. Staley and Daniel Adam Staley Calvin J. Staley and Eveline R. Staley, who are infants under 21 years of age commanding them to be and appear in your Honorable Court, on a day to be therein named, to answer the premises and abide by and perform such decree as may be passed therein, or in default thereof, that said Bill of Complaint, may be taken as against Mark C. Carpenter and Reuben R. Carpenter, his wife