respectfully represented that on the 18th day of May A.D 1870, they filed their Bill of Complaint in this Court, against Mark L Carpenter and Rencie R Carpenter his wife, Susanna E Staley, Daniel Adam Staley, Calvin J Staley, and Evaline R. Staley, for the sale of certain real estate mentioned therein. That since the filing of said Bill, to wit. on or about the twenty fifth day of September last the said Susanna E Staley intermarried with Joshua Maine of Frederick County Maryland. ~

To the end therefore that such amendment may be made of said Bill of Complaint, as will make the said Joshua Maine and Susanna E. Maine his wife, parties to the Cause, Your Petitioners pray the Court for leave to file an Amended Bill And as in duty bound will ever pray &c.

John L Motter
Sol'r for Petitioners

Exparte Order

Ordered by the Court this 5th day of October A.D. 1870, that the Complainants be allowed to Amend as prayed in this Petition. ~

W Veirs Bowie
Judge of the Cir. Court

Filed October 5th 1870 ~

Amended Bill

To the Honorable the Judges of the Circuit Court for Frederick County, in Equity. ~

The Amended Bill of Complaint of Charles W Staley, and John Adam Staley, Guardian and Prochein Ami of Daniel Adam Staley, Calvin J Staley, and Evaline R Staley, who are infants under twenty one years of age, of Frederick County, humbly shows that heretofore they filed their Bill of Complaint in this Court, against Mark L Carpenter and Rencie R Carpenter his wife, Susanna E Staley and Daniel Adam Staley, Calvin J Staley and Evaline R Staley, infants under twenty one years of age, all of Frederick County State of Maryland, praying, amongst other things, for the sale of certain real estate lying in said County, particularly described in Exhibit A. filed as part of said Bill of Complaint, to which Bill, certain proceedings have been had as by the same proceedings now in this Court will appear. ~

Your Complainants now charge by way of Amendment to their aforesaid Bill of Complaint, that the said Susanna E Staley, one of the Defendants mentioned in said Bill, and whose interest is particularly set forth in said Bill, subsequent to the filing of said Bill of Complaint, has intermarried with a certain Joshua Main of Frederick County, State of Maryland, who is therefore a necessary party to this suit ~

To the end therefore that the said Susanna E Maine, and the said Joshua Maine, may answer, as well the matters charged in the Original Bill of Complaint as in this Amended Bill, and that your Complainants may have such relief as is necessary ~

May it please your Honors to grant unto your Complainants the Writ of Subpoena, directed to Joshua Maine and Susanna E Maine his wife, 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 Original and Amended Bills be taken pro Confesso against them — And as in duty bound will ever pray &c.

John L Motter
Sol'r for Complainants

Filed October 5th 1870 ~