

Sarah A. Geesey
 vs
 Mary D. Geesey
 Matilda Geesey

No 3692 Equity ~
 In the Circuit Court for Frederick County sitting as
 a Court of Equity. ~

Be it remembered that heretofore to wch. on the 24th day of July
 in the year of our Lord One thousand Eight hundred and Seventy One, came
 the said Sarah A. Geesey into Court here sitting as a Court of Equity by her
 Solicitor Fred^l. Nelson Esq. and filed here the following Bill of Complaint
 with the Exhibits therein mentioned.

Bill

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

Humly complaining sheweth unto your Honors your Oratrix Sarah
 A. Geesey of said County, that heretofore to wch. Sometime in the year 1867 a certain
 William H. Geesey, of said County, the son of your Oratrix, was the owner in fee
 simple of certain real estate lying and being in said County, and more particu-
 larly described in a certain deed from one Adam Hummer and Christiana
 his wife, to said William H. Geesey, conveying said property to said William H.
 dated April 14th 1867, and recorded in Liber D. S. B. folio 585, one of the Land
 Records of Frederick County, a certified copy whereof is herewith filed and
 marked Exhibit A. which together with all other Exhibits is prayed to be
 taken as part of this Bill of Complaint.

Your Oratrix further sheweth that a certain John B. Stimmel of said
 County was the owner in fee simple, of a certain other real estate, lying and being,
 in said County and hereafter more particularly referred to. ~

Your Oratrix further charges, that some time in the year 1867, she bargained
 and agreed with said Stimmel for the purchase of said real estate, and that
 through her agent, one Jesse Genselman she paid the purchase money, amounting
 to Three hundred and Seventy five (\$375) dollars to the said John Stimmel. ~

Your Oratrix further sheweth as to your Honors, that on and about the same
 time, and before any deed passed from said Stimmel to your Oratrix for said
 real estate, your Oratrix bargained and agreed with her said son the said
 William H. Geesey to exchange the said real estate so as aforesaid purchased
 by her from said Stimmel for the said real estate heretofore purchased by
 said W. H. Geesey from the said Adam Hummer, that is to say, the said W.
 H. Geesey was to convey in fee the said real estate so purchased by him from
 said Adam Hummer to your Oratrix, and in consideration thereof your
 Oratrix was to convey or cause to be conveyed to said W. H. Geesey the real
 estate so purchased by her, from the said J. B. Stimmel.

Your Oratrix further sheweth, that in pursuance of said bargain and
 agreement so as aforesaid made by and between your Oratrix and the said
 W. H. Geesey, she directed and instructed the said J. B. Stimmel to execute
 and deliver to said W. H. Geesey, a deed in fee simple of said property so as
 aforesaid purchased by your Oratrix from said Stimmel; And that said
 Stimmel together with Elizabeth his wife, did so execute and deliver to
 said W. H. Geesey, a deed in fee simple of said real estate, which said
 deed is dated April 10th 1867 and recorded in Liber D. S. B. folio 584, one of
 the Land Records of Frederick County, a certified copy whereof is herewith filed
 and marked Exhibit B. ~

Your Oratrix further sheweth that since the said W. H. Geesey could lawfully

Exhibit

82