

with his part of said agreement heretofore entered into by him with your Oratrix, &c. &c. said  
W. H. Geesey did, without having executed a deed to said Oratrix in accordance with said agree-  
ment.

And your Oratrix further sheweth that no deed for said property has ever been made by  
any one to her.

Your Oratrix further sheweth that said W. H. Geesey left her surviving a widow  
Mary D. Geesey and one child, Matilda Geesey, which is an infant under twenty one years  
of age.

Your Oratrix charges that she is advised that she is entitled to have a trustee  
appointed by your Honorable Court, to convey said real estate to her as she might in  
accordance with said agreement heretofore referred to.

It is the end therefore that your Honor may pass a decree herein appointing a trustee  
with directions to convey said real estate to your Oratrix, and that your Oratrix may  
have such other and further relief to which she may be entitled.

May it please your Honors to grant unto your Oratrix the writ of subpoena  
directed to the said Mary D. Geesey and the said Matilda Geesey, ordering and directing  
them and each of them to be and appear in your Honorable Court upon some certain  
day to be therein named, to answer the premises, and abide by and perform such  
decrees as may be passed in the premises.

As in duty bound, your Oratrix will ever pray &c

Frederick J. Nelson  
Pl. for complainant

Filed July 24<sup>th</sup> 1871

Exhibit "A."

W. S. A. Rev. Stamp  
50 C. Canceled

This deed made this 1<sup>st</sup> day of April in the year eighteen hundred and fifty seven  
by us Adam Hummer and Christiana R. Hummer his wife - Witnesseth, that in consideration  
of Three hundred dollars, we the said Adam Hummer and Christiana R. Hummer his wife  
do grant unto William H. Geesey, all that parcel and lot of ground situated in Frederick  
County, State of Maryland, called "Spring Plains," being part of a tract of land for-  
merly belonging to Paul Learnaok, beginning at the end of seventeen and three eighths  
perches on the Sixth line, and running thence since and three fourths East twelve  
perches, then North fifty nine and a half East thirteen perches, then North seven-  
teen and a half East twelve perches, then North fifty four and a half West  
three and a half perches, from thence to the beginning, containing One  
Acre of land more or less, with all the appurtenances thereto have and  
and hold - Witness our hands and seals

Test. Geo. Taylor *[Signature]* Adam Hummer *[Seal]*  
Christiana Hummer *[Seal]*

State of Maryland, Frederick County, to wit:

I hereby certify that on this first day of April in the year of our Lord eighteen  
hundred and fifty seven, before the subscriber one of the Justices of the Peace of the State of  
Maryland in and for Frederick County, personally appeared Adam Hummer and  
Christiana R. Hummer, and acknowledged the foregoing deed to be their act.

Acknowledged before George Taylor J. P.

State of Maryland  
Frederick County, to wit:

I hereby certify that the foregoing is a true copy of the Original deed as recorded in Lib. B. 11  
Vol. 585. One of the Court Records of Frederick County.

*[Seal]*

In testimony whereof I hereunto subscribe my name and affix the seal of the Circuit  
Court this 25<sup>th</sup> day of July A. D. 1871  
Charles Monty, Clerk

W. H. Geesey