

Wesley G Hammond et al. } No. 3749 Equity ~
 vs } In the Circuit Court for Frederick County, sitting
 Clarence Simpson et al } as a Court of Equity ~

Exhibit No 1

Be it remembered that here before to wit: On the 23rd day of January in the year of our Lord One thousand Eight hundred and seventy three, Came the said Wesley G Hammond et al into Court here sitting as a Court of Equity, by Frederick J Nelson their Solicitor, and filed here the following Bill with Exhibits therein mentioned ~

Bill

To the Honorable the Judges of the Circuit Court for Frederick County sitting in Equity, Humbly Complaining, sheweth unto your Honors, your Orators Wesley G Hammond, Mary A Shelby, Edith B Roach William G Hammond, Upton J B Hammond, Thomas G Hammond and Regim B Hammond, all of the State of Indiana that heretofore to wit on or about the 3rd day of November 1871 a certain Regim Hammond of said State of Indiana died intestate, seized and possessed of certain real Estate, lying and being situate in Frederick County Maryland, and more particularly described in a certain deed of Conveyance from Thomas Hammond, Trustee to said Regim Hammond, and recorded in Liber B. G. F. No 2, folios 545. 546. One of the land records of said County, a certified copy whereof is herewith filed and marked Exhibit No 1, which together with all other Exhibits is prayed to be taken as part of this Bill of Complaint.

Your Orators further shew unto your Honors that the said Regim Hammond left them surviving Ann Hammond his widow, aged about Twenty Seven years, and the following Children and grand Children his heirs at law to wit: Your Orators, Wesley G Hammond, Mary A Shelby, Edith B Roach William G Hammond, Upton J B Hammond, Thomas G Hammond, Regim B Hammond and Julia A intermarried with Richard Simpson; That said Julia A Simpson is since dead, leaving her surviving her Husband Richard Simpson and the following Children to wit: Clarence, Elison, Edward, and Julia A Simpson which said Children of the said Julia A Simpson are all infants under the age of twenty one years. ~

Your Orators charge that said real estate is not susceptible of an advantageous division among the said parties entitled thereto, but that it would be greatly to the advantage of all said parties, infants as well as adults that the same should be sold, and the proceeds thereof be divided amongst said parties according to their respective rights. ~

To the end therefore that the said defendants may answer this Bill of Complaint, and that a decree may be passed in the premises ordering and directing said real estate to be sold, and that the complainants may have such further and other relief in the premises as they may be entitled to. ~ May it please your Honors to grant unto your Orators the writ of Subpoena against the said Clarence, Elison, Edward, and Julia A Simpson, ordering and directing them and each of them to be and appear in this Court on some certain day to be named therein, to answer the premises and abide by and perform such decree as may be passed therein, as in duty bound, your Orators will ever pray &c. ~

Filed Jan. 23rd 1872 ~

Frederick J. Nelson