

Washington County, Maryland. ~

4 Rezin Simmons a son, now residing in Frederick County, Maryland. ~

5 Mary R. D. Worthington a daughter, now wife of John J. Worthington, and who now reside in Frederick County, Maryland. ~

6 Thomas W. Simmons, a son, now residing in Washington County, Maryland. ~

7 James Vernon Simmons Simmons a son, who resides in the State of Virginia ~

8 Serena Hammond a daughter residing in Frederick County, Maryland. ~

Your Complainants further charge, that all of the foregoing named heirs at-law of said Sophia Simmons deceased are adults except Clara Ann Simmons, John R. Simmons, Richard G. Simmons, and Laura Mary Simmons, who are infants under the age of twenty one years. ~

Your Complainants further charge, that the said Lot of ground and premises above described in Exhibit "A" cannot be divided without loss or injury to the parties interested therein, and that the interest of all parties, infants and adults requires that the same be sold, under a decree of your Honorable Court, and the proceeds of Sale distributed among the parties entitled thereto according to their respective interests ~

To the end therefore that the defendants herein after named may answer the several matters and things herein before stated, and that the land and premises herein before described and mentioned, may be sold under a decree of this Court, and the proceeds of Sale distributed among the parties entitled thereto, according to their several and respective interests - And that your Complainants may have all such other and further relief in the premises, as the nature and Equity of their case may require ~

May it please your Honors to grant to your Complainants, writs of Subpoena against Clara Ann Simmons, John R. Simmons, Richard G. Simmons, and Laura Mary Simmons, John J. Worthington, and Henry R. D. Worthington his wife, and Serena Hammond of Frederick County, State of Maryland and against George W. Cole and Ann Sophia Cole his wife of Washington County, State of Maryland commanding them and each of them to appear in this Court at some certain day to be therein named, to answer the premises and abide by and perform such decree as may be passed therein, And your Complainants will ever pray, &c.

Wm. G. Ross
Chas. W. Ross

Solicitors for Complainants

Filed Sept. 5th 1871 ~

Exhibit "A"

This Deed, made this 7th day of March in the year 1870, by us David J. Bennett, and Charity A. Bennett his wife of Baltimore City in the State of Maryland Witnesses, that in Consideration of Seventeen Hundred Dollars, we the said David J. Bennett and Charity A. Bennett his wife, do grant in fee simple unto Sophia Simmons of Frederick County in the State of Maryland, all that piece or part of the Northern half of Lot No One hundred and fifteen, situate and lying on the South Side of West Third Street, in Frederick town in the County aforesaid beginning for the sharp curve intended to be conveyed at the end of twenty seven feet four inches from the South Eastern corner of Clinchards Alley, and running thence Eastwardly by and with Third Street, thirty five feet to intersect the Eastern boundary line of said Lot No One hundred and fifteen, thence in a Southerly direction and with the Eastern boundary line of the whole lot No. 115, One hundred and sixty six feet, thence westerly and in a line parallel with the division line between the Northern and Southern portions of the whole lot aforesaid, fifty two feet four inches to Clinchards Alley, thence Westwardly with said Alley, nine feet, thence

Exhibit "A"