

Exhibit A

Heller his wife, John C. Heller and Catharine Heller his wife, Reuben S. Heller and Perry W. Heller and Mary A. Heller Guardians and prochein Amie of Geo. H. S. Mary Alice, Amanda and Silas Heller, all of Frederick County and state of Maryland humbly shows that heretofore a certain John Heller of the County and State aforesaid during his life time, was seized and possessed of certain real estate, lying and being in Frederick County and State of Maryland, which was conveyed to him by Robert Kingston and Caroline Kingston, his wife David D. Bacon and Moriah Bacon of the county Samuel Duffendall Rebecca Ann Markes, John F. Cyster, Charles A. Cyster and Charlotte S. Cyster his wife, by deed bearing date the fourth day of February in the year Eighteen Hundred and sixty five, which deed is recorded in Liber B. G. C. No. 2 folio 391, one of the Land records of Frederick County, and by Jacob Rife and Susannah Rife his wife and Aloysius F. Orendoff, and Julia Ann Orendoff, his wife by deed bearing date the second day of April in the year Eighteen Hundred and sixty nine which deed is recorded in Liber B. G. C. No. 2 folio 388, One of the Land records of Frederick County. Certain Copies of which deeds are herewith filed marked respectively A & B which Exhibits, together with all other Exhibits filed by your Complainants, it is prayed may be taken as part of this Bill of Complaint, and the said John Heller being so thereof seized and possessed, on the third day of July in the year Eighteen Hundred and seventy one, departed this life intestate leaving Mary A. Heller his widow, and the following named children and heirs at law surviving him, David C. Heller who intermarried with Catharine Eckman John C. Heller who intermarried with Catharine Freshour, Reuben S. Heller, Perry W. Heller, Geo. H. S. Heller, Mary A. Heller, Amanda A. Heller and Silas Heller, all of Frederick County, That the said George H. S. Heller, Mary A. Heller, Amanda A. Heller and Silas Heller, are infants under twenty one years of age.

And your Complainants charge that said real estate is not susceptible of descent to the said parties aforesaid, nor is it advantageous to them, and that the said Complainants are entitled to have the same sold and the proceeds thereof distributed among said parties in proportion to their respective interests.

And your Complainants charge, that it will be for the interest and advantage of all the said parties, to sell the aforesaid real estate, and to divide the proceeds there of as aforesaid, and your Complainants are advised that a sale thereof cannot be had without the assistance of this Honorable Court.

It is the end therefore, that the real estate mentioned and described in Exhibits A & B, may be sold under the direction of your Honors, and that the proceeds thereof may be distributed among the parties aforesaid in proportion to their respective interests and that your Complainants may have such further and other relief as in Equity they may be entitled to, may it please your Honors to grant unto your Complainants the writ of Subpoena to George H. S. Heller, Mary A. Heller, Amanda A. Heller and Silas Heller, infants under twenty one years of age, and residents of Frederick County and state of Maryland, 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 thereon, and further to order and direct a Commission to issue to a Commissioner to assign a Guardian for said infants George H. S. Heller, Mary A. Heller, Amanda A. Heller and Silas Heller, to take their answer, and make answer for them to this Bill of Complaint, and return the same to this Honorable Court.

And as we duty bound well ever pray &c.

Jno. C. Moller

Sol for Complainants

Filed May 7<sup>th</sup> 1872

Exhibit B