

Isaac Seely and Fanny
Seely his wife and Others
vs
Emmeline Seely, Cornelius
B. Lawrence and Matilda
B. Lawrence his wife & others

No 3427 Equity -
In the Circuit Court for Frederick County, sitting as a
Court of Equity. -

It is remembered that heretofore to wit on the 14th day of November in the
year of our Lord One thousand Eight hundred and seventy one, came the said Isaac
Seely and Fanny Seely his wife, into Court here sitting as a Court of Equity, and filed
by their solicitors Hays & Co. H. Ross Esqrs, the following Bill of Complaint, with the Exhibits
therein mentioned -

Bill of Complaint

To the Honorable the Judges of the sixth Judicial Circuit of the State of Maryland
sitting in the Circuit Court for Frederick County as a Court of Equity. -

The Bill of Complaint of Isaac Seely and Fanny Seely his wife of the State of New York
of Albro Hubbard and Julia C. Hubbard of the State of New York and of Anna M. Seely of
Frederick County State of Maryland, Jeanne S. Seely and Charles H. Seely of the State of
New York, shows that a certain Lyman Seely of Frederick County State of Maryland deceased,
died intestate on or about the Twenty fourth day of September Eighteen hundred and seventy
seized in fee simple, of all that Lot or Lots of ground situate on north Market Street
Frederick City, heretofore conveyed by Joseph Groat and Susan Groat his wife to
said Lyman Seely by deed dated on the first day of July in the year Eighteen hundred
and sixty nine, all of which matters and things will more fully appear by a certified
copy of said deed here with Exhibited marked Exhibit No 1, which with all other Exhibits
herein after introduced your Complainants pray may be taken as part of this their Bill
of Complaint - Your Complainants charge that the said Lyman Seely at his death
left a widow Emmeline Seely, entitled to dower in said premises - And the following children
and grand children to whom said lands and Real Estate descended as heirs at Law, to wit:

- 1 Isaac Seely now resident of the State of New York. -
- 2 Julia C. Seely now wife of Albro Hubbard, both of whom reside in the State of New
York -
- 3 Isabella B. Lawrence and Cornelia B. Lawrence, children of Rebecca Lawrence
a daughter of said Lyman Seely, and who died before her said father, both of whom are infants
under the age of twenty one years and reside in Frederick City in Frederick County State of
Maryland -
- 4 Matilda B. Lawrence a daughter now wife of Cornelius B. Lawrence, both of whom
reside in Frederick County State of Maryland. -
- 5 Anna M. Seely, a daughter, living in Frederick City. -
- 6 Jeanne S. Seely, a daughter, living in Frederick City. -
- Charles H. Seely a son living in Frederick City - All of which heirs at Law are of full
age except the 11 widew of Lyman Seely, now deceased. -

Your Complainants further state that Emmeline Seely, the widow of said Lyman Seely
and Isaac Seely, Julia C. Hubbard, Matilda Lawrence, Anna M. Seely Jeanne S. Seely,
Charles H. Seely, Isabella B. Lawrence and Cornelia B. Lawrence, and the children
and grand children of said Lyman Seely, are seized in fee or all that Lot or portions
of ground situate in Frederick City State of Maryland, which were hereafter
conveyed to them by the Mayor, Aldermen and Common Council of Frederick
by deed dated on the 4th day of January 1871, a certified copy of which deed
is herewith Exhibited marked Exhibit No 2. -

Your Complainants further state that the said estate herein before does not

Exhibits