

Bill

No 3787 Equity.

To the Honorable the Judges of the Circuit Court for Frederick County, sitting as a Court of Equity,

The Bill of complaint of Harriet F. Root and Lanna A. Root of Frederick County, State of Maryland, respectfully show to your Honor, that a certain Daniel Root of R. died sometime in the Month of March in the year Eighteen hundred and Seventy two intestate - and seized and possessed of certain Real Estate situate in Frederick County, State of Maryland, and composed of several parts of tract of land viz; part of a tract called Seventh Dividend, part of Williams Hill, and part of a tract called "Bully Creek" fully described and set forth in the deed from Samuel Birely to said Daniel Root of R. and Samuel D. McGuiness, to said Daniel Root of R. except provided such portions thereof, heretofore conveyed by the said Daniel Root of R. to Frederick Birely, John W. Haugh and Samuel D. McGuiness and others by deed, and about ~~two~~ Acres of said land sold to a certain Samuel Davis by the said Daniel Root in his life time but not conveyed, as will fully and at large appear by certified copy of deed from the said Samuel Birely, and from Samuel D. McGuiness and others to said Daniel Root of R. and by certified copies of deeds from said Daniel Root of R. to Frederick Birely, John W. Haugh and to Samuel D. McGuiness and others, and also by a copy of the course and distances of the land sold by said Daniel Root of R. to Samuel Davis herewith Exhibited marked Exhibits Nos. 1, 2, 3, 4, 5 & 6 which your Complainant prays together with all other Exhibits herein after produced may be taken and considered as part of this Bill of complaint the same as if set forth in words and figures. Your Complainants further state that the said Daniel Root of R. died intestate in the month of March in the year Eighteen hundred and Seventy Two as aforesaid, leaving a widow named Ann Elizabeth Root his surviving who is entitled to dower in all the lands whereof the said Daniel Root died seized and possessed, and the following children who are co heirs at law, and to whom the said lands descended as tenants in common, viz;

- 1st. Harriet Root a daughter.
- 2nd. Lanna A. Root a daughter.
- 3rd. Mary W. Root a daughter.
- 4th. Richard G. Root a son.
- 5th. Emma A. Root a daughter.

Your Complainants further state that the said Mary W. Root, Richard G. Root and Emma A. Root are infants under the age of twenty one years, and that they are residents of Frederick County. Your Complainants further state that the said Real Estate cannot be divided amongst the parties interested without loss and injury, and that it would be to the interest and advantage of all the parties to this cause that the Real Estate mentioned aforesaid be sold under a decree of your Honorable Court and