

death or remarriage of the said Susan Staley to the share or interest of the said William A Staley and the Real Estate mentioned in said Bill of Complaint viz: George S Staley and S. Milton Staley who are of age, Hester Staley, Annie Staley, Estelle Staley, Catharine Staley, Blanche Staley & Olivia Staley who are infants under twenty one years of age all of whom reside in Frederick County Maryland. Your Petitioner further represents and charges that it will be for the interest of all parties and especially the infants above named to have said Real Estate sold and the proceeds thereof distributed among the parties thereto entitled and that said Real Estate is not susceptible of division among said parties without great and injurious loss to them. Your Petitioner further represents that he is advised that by the death of the said William A Staley it is proper that said Bill be amended so that the Executors, heirs and representatives and devisees of said William A Staley be made parties thereto and be summoned in to answer its allegations in respect to any interest they may have therein and asks that said Bill be amended so that it be charged therein that it will be for the interest of all parties and especially the said infants named in this petition as the children and devisees of the said William A Staley to have said Real Estate sold and the proceeds divided among those entitled thereto and that in order to make said amendments reference must be had to this Honorable Court.

To the end therefore that the parties above named to-wit: Susan Staley S Milton Staley Executors and devisees George S Staley Hester Staley, Annie Staley, Estelle Staley, Catharine Staley Blanche Staley and Olivia Staley the last six of whom are infants under twenty one years all of Frederick County Md. and devisees and children of the said William A Staley be summoned in to answer said Bill of Complaint and the amendment which charges that it would be to the interest of all and especially the infants and that said Amendment be made.

May it please your Honors to grant unto your Petitioner an order directing Subpoenas to issue directed to Susan Staley and S. Milton Staley Executors and devisees George S Staley, Hester Staley, Annie Staley Estelle Staley Catharine Staley Blanche Staley and Olivia Staley devisees and children of the said William A Staley commanding them to be and appear in your Honorable Court on a day to be therein named to answer said Bill of Complaint and the prayed for Amendment in reference to the sale of said Real Estate and abide by and perform such decree as may be passed therein and to further order and direct that the bill be amended so as to charge that it will be for the interest of all said parties and especially the infants above mentioned that said Real Estate be sold and the proceeds be distributed among the parties thereto entitled

And as in duty bound will ever pray
 Jas. C. Motters
 Sol for Petitioner

State of Maryland, County of Frederick Jct:
 Be it remembered that on this 23rd day of January A D. 1875 personally appeared before the subscriber a Justice of the Peace in and for the County and State aforesaid Charles E Mealey who being sworn according to Law declares that the matters and things alleged in said petition are true as herein set forth.

Wm. Higgins J.P.