

the sale of the said, undecorated lot in the former Bill of Complaint. Your Orators therefore charge that said George Shaff at the time of his death was seized and possessed of certain real estate situated in the village of Jefferson, Frederick County State of Maryland, the same being fully set forth and described in a deed from John Loats and Henry Hilliard herewith filed, marked Exhibit No. 1, which your orators pray may be taken and considered a part of this their Bill of Complaint.

Your orators further charge that the said land is not susceptible of advantageous division among the parties interested, and that a sale thereof and a division of the proceeds, will be to the interest and advantage of all the heirs of said George Shaff and that the said Eight Children and heirs aforesaid hold the said land as tenants in Common. It tender consideration, whereof and inasmuch as your Complainants are remediless in the premises by the strict rules of the Common Law and are only remediable in a Court of Equity, where matters of such nature are properly Cognizable, and to the end that the Defendants hereinafter named, may answer the several matters and things herein set forth as fully and particularly as if the same were herein again repeated and they were thereto interrogated and that the said real estate herein described in Exhibit No. 1. may be decreed to be sold and the proceeds divided among those interested and that your orators may have such other and further relief as the nature and Equity of this case may require.

May it please your Honorable Court to grant your Orators the writ of Subpoena against John Shaff and Rebecca Shaff his wife, Solomon Shaff and Saml^l Shaff his wife, Francis Shaff and Leonard Shaff his wife, Jacob Shaff, Isaac N. Fry and Mary C. Fry his wife, Charles B. Ford and Anna M. Ford his wife, commanding them and each of them to be and 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 as in duty bound your Complainants will ever pray &c.

(Filed May 6 1875)

J. E. R. Wood
Solicitor for Complainants

Exhibit 1

This deed made this 1st day of April in the year 1861 by John Loats and Henry Hilliard Trustees, Witness it whereas by a decree of the Circuit Court for Frederick County sitting as a Court of Equity passed on the 12th day of January in the year 1857 in the case of Paul Horns (vs) Louisa Hilliard Administratrix of John Hilliard deceased being do 2000 on the Equity Docket of said Court the said John Loats and Henry Hilliard were appointed trustees to sell the land decreed to be sold and have sold the hereinafter described Lot or parcel thereof to George Shaff of the County of Frederick and State of Maryland for the sum of One hundred dollars who has fully paid the purchase money therefor; Now therefore in consideration of the premises the said John Loats & Henry Hilliard do grant unto the said George Shaff all the right and title of all the parties to the aforesaid case in and to all that lot or parcel of Land situate lying and being in the town of Jefferson Frederick County Maryland known and designated on the plat of said town as Lot No 6 said Lot fronting on the street 50 feet