died seized and possessed of certain Mountain Lots situate in Frederick County State of Maryland containing 18 Acres of Land more or less

Your Complainants further State that said Christian Correll left a widow named Mary E Correll him surviving entitled to dower in said Real Estate and the following children to wit: a son John Q Correll an adult living in Baltimore County Maryland one of the Complainants, a daughter Lydia E now wife of John H Crabbs living in Carroll County Maryland, and a daughter Frances L now wife of Abraham Null living in Carroll County Maryland, to whom said lands descended as Co parceners. Your Complainants charge that said Christian Correll and Mary E Correll by deed dated on the 22nd day of October in the year 1870 conveyed to his daughter Frances L Null and Abraham E Null her husband all those Lands situate in Carroll County therein described for the alleged consideration of Five thousand dollars all of which matters will more fully appear by reference to a certified copy of said deed hereunto exhibited marked Exhibit No 8.

Your Complainants charge expressly that the consideration of Five thousand dollars was never paid or intended to be paid by said Null and his wife or either of them and that the said conveyance was made as an advancement to said Frances Null and her husband Abraham Null by said Christian Correll as the portion of his said daughter in his Real Estate. Your Complainants offer ready to assign to Mary E Correll her dower in said Real Estate Your Complainants charge that the said lands and tenements cannot be divided without loss or injury to the parties interested and that it would be to the benefit and advantage of all parties concerned that the said lands and tenements should be sold under a decree of this Court and the proceeds of sale divided among the parties according to their respective rights.

To the end therefore that the Defendants hereinafter named may answer the several matters and things herein before stated and that said Abraham E Null and Frances L Null his wife state fully the nature and account of the consideration of the Deed executed by Christian Correll and wife to them and how much if any money and when was ever paid by them or either of them as the consideration for such conveyance, and that Commissioners may be appointed by this Court to locate and assign the dower of said Mary E Correll in the said lands whereof her said husband Christian Correll died seized and possessed, and that said lands and tenements may be decreed to be sold and the proceeds thereof distributed among the parties entitled to the same according to their respective interests charging the said Frances L Null with the value of the lands advanced to her and her said husband as aforesaid, and that said Frances L Null and Abraham Null her husband may be compelled to elect to bring said Lands so conveyed to them by said Christian Correll as aforesaid and that your Complainants may have all such other and further remedy in the premises as the nature and Equity of their case may require.

May it please your Honors to grant to your Complainants the Writs of Subpoena against Mary E Correll of Frederick County Md. to John H Crabbs and Lydia E Crabbs his wife and Abraham Null and Frances L Null his wife of Carroll County commanding them and each of them to be and appear in this Court by some certain day to answer the premises and abide by and perform such decree as may be passed therein

And as in duty bound &c.

Wm J Ross
Chas W Ross
Solicitors for Complainants.

Filed Nov 24, 1875.