Amended Bill

To the Hon the Judges of the Circuit Court for Frederick County sitting in Equity.

The amended Bill of Susanna E Shaw to the bill of Complaint heretofore filed by her. By way of amendment to the Bill of Complaint heretofore filed by her your Oratrix showeth unto your Honors that heretofore to wit: on or about the day of March 1874 a certain Solomon Krise late of said County died seized and possessed in fee of certain Real Estate lying and being situate in Frederick County State of Maryland, that said Real Estate consists of certain land adjoining the lands of a certain Joseph Frozell, Samuel Maxwell & John Knode containing Ninety Nine and one half Acres (99½) more or less, and also a certain other tract or parcel of Land called the "Home Place" and now in the occupancy of Elbridge F. Krise. Your Oratrix further shows unto your Honors that the said Solomon Krise died intestate leaving him surviving Mary Ann Krise his widow about Sixty seven years of age and the following children to wit: Your Oratrix Susanna E Shaw wife of Thomas Shaw decd living in Carroll County, Elmira Crouse wife of James Crouse and Elbrge E Krise both living in Frederick County that said Real Estate of the said Solomon Krise decd. descended to his children as heirs at law subject to the right of dower of his said widow and is now owned by them as heirs at law and tenants in common.

And your Oratrix further charges that said Land cannot be divided without and injury to the parties interested therein and that it will be for the advantage of all the parties in interest that the aforesaid Real Estate should be sold and the proceeds divided according to the respective rights of the said parties. And your Oratrix further charges that the said Elmira Crouse is now Non Compos Mentis, and incapable of making a valid deed or contract or of attending to her own affairs. Your Oratrix further charges that on or about the 7th day of November 1874 that the said Elbridge Krise of the one part and the said Susanna E Shaw (Your Oratrix) Mary A Krise (the widow of Solomon Krise) and Elmira Crouse of the other part entered into certain Articles of Agreement a copy whereof is herewith filed and marked "Exhibit A" for the sale of said part of said Real Estate called the "Home Place" and now in the occupancy of said Elbridge E Krise but your Oratrix is informed that all of the said parties to said Articles are willing that the same should be annulled and their rights thereunder determined and that said Land should be sold under the decree of your Honorable Court, To the end therefore that the said Elmira Crouse and James Crouse her husband and the said Elbridge Krise and the said Mary Ann Krise the said widow may answer the premises and that a decree may be passed for the sale of the said land and the proceeds of sale thereof be distributed between said parties in the proportion to which they may be respectively entitled and that your Oratrix may have such further and other relief to which she may be entitled. May it please your Honors to grant unto your Oratrix the Writ of Subpoena directed to the said Elmira Crouse and James Crouse her husband and Elbridge F. Krise & Mary A Krise the said widow commanding them and each of them to be and appear in your Hon'l Court on some certain day to be named therein to answer the premises and to abide by and perform such decree as may be passed therein.

And as in duty bound your Oratrix will ever pray &c

Fred. J Nelson
Sol. for Complt

Filed July 3 1875