agreement signed and sealed by your Orators & said John Alberts filed herewith as Exhibit No 2 Your Orators further show that they fully complied with all the stipulations to be performed by them, that the said John Alberts paid said sum of fifty dollars & the further sum of twenty five dollars as will appear by the receipts endorsed on said Article of Agreement and also executed to your Orators his note for the One hundred and twenty five dollars therein specified as will appear by said promissory note filed herewith as Exhibit No 3, and also paid the sum of one hundred dollars due on 1st April in the year 1866, that the said John Alberts died sometime in the year 1865 intestate, having said sums of One hundred and twenty five dollars unpaid, that the same is now due and owing to your Orators with interest on the One hundred & twenty five dollars from the 1st. day of April 1865, that said John Alberts died leaving Charles Alberts, Thomas Alberts & Rachel Alberts, his infant brothers & sisters as his heirs at law, who are infants & to whom said real estate descended subject to the lien of your Orators for unpaid purchase money and that Adam Alberts & Mary Alberts, the father & mother of said John Alberts are living upon said land & have the same in their possession and your Orators are advised that they are entitled to have said land & premises sold for the payment of the unpaid purchase money due your Orators, In tender consideration whereof & for that your Orators are remediless in the premises by the strict rules of the common law and relievable only in a Court of Equity where matters of this nature are properly cognizable To the end therefore that the said Charles Alberts, Thomas Alberts, Rachel Alberts, Adam Alberts & Mary Alberts his wife, may answer all the charges & matters aforesaid, and that said real estate may be sold by a trustee to be appointed by your Honor & the proceeds of sale applied to the payment of the purchase money unpaid as aforesaid; and that your Orators may have all such other & further relief as the nature of the case may require, and to your Honor shall seem meet. May it please your Honor to grant unto your Orators the State of Maryland's writ of subpoena to be directed to the said Charles Alberts, Thomas Alberts, Rachel Alberts, Adam Alberts & Mary Alberts his wife, of Frederick County thereby commanding them & each of them to be and appear before your Honor in your Honorable Court on a certain day thereon to be named to answer all and singular the premises and to stand to, abide & perform such order and decree therein as to your Honor shall seem meet, & your Orators will ever pray &c

Filed 26th July 1866

Grayson Eichelberger
Sol for Complainant

Exhibit No 1

Internal Revenue Stamp Cancelled U. S. — United States

This deed made this Twenty Eighth day of April, in the year eighteen hundred & sixty three, by me Edward Baker, Executor, Witnesseth, that Whereas, Frederick Baker, late of Frederick County, Maryland, deceased, by his last will & testament, bearing date the 26th. day of January 1860, duly proved & recorded in the Office of the Register of Wills of said County, did authorize and empower, his executors Aaron Baker & Edward Baker therein named, to sell & convey his real estate. And Whereas, the said Aaron has filed in the Orphans' Court of said County a renunciation of said trust. And Whereas, I the said Edward Baker, as acting executor, have sold the following described part of said estate to