

Bill  
of  
Complaint

To the Hon<sup>ble</sup>. the Judges of the Circuit Court for Frederick County,  
sitting in Equity.

Shumbly Complaining sheweth unto your Honors  
your Orator William H. Danner that hitherto, to wit: Some time in  
the Month of July A. D. 1875, a certain Abraham Danner, dead  
seign and possessor of a certain real estate, lying and being  
situate in Woodboro' District, in Frederick County, State of Maryland,  
and more particularly described in a certain Deed from John P. Beard  
to Abraham Danner, recorded in Lib<sup>er</sup> B. G. D. No. 1. folio 610, one of  
the Land Records of said County, a certified copy whereof is herewith  
filed and marked Exhibit No. 1, which together with all other Exhibits is  
prayed to be taken as part of this Bill of Complaint Your Orator  
further sheweth unto your Honors that the said Abraham Danner  
left him surviving a widow; Dorothy Danner about seventy  
one or two years old, who is willing that said real Estate should  
be sold, and that she receive her proportion in lieu of dower,  
and the following children his heirs at law to whom said real Estate  
descending as tenants in common, to wit: Margaret Drah, who is now  
dead leaving a son begotten out of wedlock before her marriage with  
David Drah by name Charles Danner, Mary E. Willard, William  
H. Danner, (your Orator) and Harriet Danner, his wife, John J.  
Danner, Rachel Danner, his wife, residing in the State of Iowa,  
beyond the jurisdiction of this Court, James Michael Danner, whose  
residence is unknown and who has been absent from this State  
since the year 1858, and from whom nothing has been heard during  
all that time, Catharine Fox, wife of Jeremiah Fox, Francis Stetty  
wife of Jacob C. Stetty, Martha Reek, Ezra Danner, who resides  
in the State of Iowa and David H. Danner who resides in  
the State of Ohio And your Orator further charges that he is  
desirous of having a Partition of said land made between the  
parties according to their aforesaid interests or a sale of the same,  
and a distribution of the proceeds of the said sale according  
to the respective interests of the said parties, and has applied to  
said aforesaid parties for that purpose. But his reasonable application  
in that behalf have been rejected by the said parties, and your  
Orator is advised that he has no redress except by an appeal  
to this Court And your Orator further charges that it will be  
to the interest and advantage of all the parties in interest that  
said real estate be sold and the proceeds divided, the same not  
being capable of an advantageous purchase And this Complaint  
and further sheweth unto your Honors that a certain Nancy Barrick of  
Frederick County, State of Maryland, holds a Mortgage executed to  
her by the said Abraham Danner for Fifteen Hundred Dollars, which  
Mortgage is still due and unpaid.

It is therefore, that the said Dorothy Danner, Charles Danner,  
son of Margaret Drah dec<sup>d</sup>., Mary E. Willard, Catharine Fox and  
Jeremiah Fox her husband, Francis Stetty and Jacob C. Stetty, her