

No 4218 Equity

Bill

William Pearl & wife  
Urias Ramsburg & wife  
et al

vs  
David Levi Staley & wife  
Jonathan A. Staley & wife

No. 4218 Equity.

In the Circuit Court for Frederick  
County, as a Court of Equity.

May Term, 1879.

To the Honorable the Judges of the Circuit Court for Frederick  
County as a Court of Equity

The Bill of Complaint of William Pearl and Margaret L. Pearl, his wife, Urias Ramsburg and Ann S. Ramsburg, his wife, and of Sarah Staley by William Pearl her trustee respectively represents, that hitherto, to wit: in or about the year Eighteen hundred and sixty three, a certain Peter S. Staley, late of Frederick County, departed this life intestate, leaving as his children and heirs at law a son David Levi Staley, who is married, and the name of whose wife is Sarah Staley, both of whom are adults, residing in Frederick County; a daughter Margaret L. Pearl, now the wife of William Pearl, both of whom are adults residing in Frederick County, a daughter Sarah Staley, who is an adult unmarried and resides in Frederick County, a daughter Ann S. now the wife of Urias Ramsburg both of whom are adults, and reside in Frederick County, and a son Jonathan A. Staley, who is married, and the name of whose wife is Jane Staley, both of whom are adults residing in Frederick County.

Your Complainants further state that the said daughter Sarah Staley is now *compus mentis*, and that William Pearl is her trustee appointed by your Honorable Court, and your Complainants file herewith as part of this bill a certified copy of the order appointing said William Pearl trustee of said Sarah Staley, and also a certified copy of the docket entries in the cause in which said order was passed, marked respectively Exhibits Nos. 1 & 2.

Your Complainants further state that said Peter S. Staley left also surviving him an widow Margaret L. Staley who departed this life in or about the year Eighteen hundred and seventy three. Your Complainants further state that said Peter S. Staley was at the time of his death seized and possessed of certain real estate situated in Frederick County, which real estate is described in a deed from Darius Stodges to said Peter S. Staley a certified copy whereof is herewith filed as part of this bill marked Exhibit No. 3, and in a deed from John T. Neighbors to said Peter S. Staley, a certified copy whereof is herewith filed as part of this bill marked Exhibit No. 4 and in a deed from C. H. Burkhart and wife to said Peter S. Staley a certified copy whereof is herewith filed as part of this bill marked

Exhib  
No.