

his wife, and of William Pearl, trustee of Sarah Staley, all of Frederick County, humbly shew, that hitherto they filed their Bill of Complaint in this Court against a certain David Levi Staley and Sarah Staley, his wife, Jonathan A. Staley and Jane Staley, his wife all of Frederick County, praying amongst other things for a sale of certain premises for the purpose of dividing the proceeds of sale among the parties entitled thereto in proportion to their respective rights, as in said bill is particularly set forth, to answer which the defendants were duly summoned to appear, but they have not answered the same, as by the proceedings now in this Court will appear. And your Complainants have lately discovered, and now charge by way of amendment to their aforesaid bill of Complaint that the said Jonathan A. Staley died on the twenty-eight day of July in the year Eighteen hundred and seventy-four, executed a mortgage upon his interest in said real estate and premises to a certain Louis F. Dietrich of Baltimore City in the State of Maryland, a certified copy whereof is herewith filed as part of this amended and Supplemental Bill of Complaint marked Exhibit No. 1, to Complainants' amended and Supplemental Bill of Complaint, and that said Louis F. Dietrich is therefore a proper and necessary party to this suit. Your Complainants further state by way of supplement to their aforesaid Bill of Complaint, that since the filing of the Original bill of Complaint in this cause, the said Sarah Staley wife of David Levi Staley, has died, that her interest being merely that of a contingent or potential right of dower in an undivided part of said real estate now vests in no one, and descends to no one. Your Complainants further state by way of Amendment to said bill of Complaint that the other Sarah Staley named in said bill of Complaint is a lunatic and of unsound mind, and therefore a proper and necessary party defendant in this suit. To the end therefore that the said David Levi Staley, and the said Jonathan A. Staley and Jane Staley, his wife, may answer this amendment and supplement, and that said Louis F. Dietrich, may answer as well the matters charged in the Original bill of Complaint as in this amended and Supplemental bill, and that said Sarah Staley by guardian to be appointed by your Honorable Court may answer as well the matters charged in the Original bill of Complaint as in this amended and Supplemental bill, and that your Complainants may have such relief against them as is prayed by their Original bill against the said David Levi Staley and Jonathan A. Staley and Jane Staley his wife. May it please your Honor to grant unto your Complainants the writ of subpoena directed to the said David Levi Staley, Jonathan Staley and Jane Staley, his wife and Sarah Staley of Frederick County and Louis F. Dietrich of Baltimore City, commanding them and each of them to be and appear in this Court, on some certain day to be therein named to answer the premises, and abide by and perform such decree as may be passed thereon, and are in duty bound &c.

C. V. S. Levy.

Solutor for Complainants.

Filed February 12th, 1878.