

No. 4119 Equity

Bill of
Complaint
of
Complainants

A Holland Sigafosse
& others
vs
Andrew Jackson Sigafosse
Chas Emory Sigafosse

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

The bill of Complaint of Annistead Holland Sigafosse & Senorita Sigafosse his wife and William H. Sigafosse of Frederick County, respectfully shews unto your Honors, that William Sigafosse late of said County died intestate seized and possessed of certain real estate situated in the town of Berlin in said County, particularly described in four deeds of conveyance from Robert Bone & wife, William Kuhn, A. J. M. Teller & wife, and James Kennedy - Certified copies of which are filed herewith marked Exhibits Nos 1, 2, 3 & 4 respectively and which with all other Exhibits herewith filed are prayed to be taken as part of this bill of Complaint as fully as if here inserted in words & figures; that the said William Sigafosse died leaving no widow and the following as his only children and heirs at law, viz: Your complainants A. Holland Sigafosse & Andrew Jackson Sigafosse & Chas Emory Sigafosse all of whom live in Frederick County & all of whom are adults with the exception of Andrew Jackson Sigafosse & Charles Emory Sigafosse who are infants; that said four children now own said real estate by inheritance as tenants in common that the same is not susceptible of division among said tenants in common without injury and loss and it would be to the interest and advantage of all, infants as well as adults, for said real estate to be sold and the proceeds divided between them.

In tender consideration whereof and for that your complainants are remediless in the premises by the strict rules of the Common Law and relievable only in a Court of Equity, where matters and things of this nature are properly cognizable. To the end therefore that the said Andrew Jackson Sigafosse & Chas. Emory Sigafosse may answer the premises fully and particularly and that said real estate may be sold by a Trustee to be appointed for that purpose & that your complainants may have such other and further relief in the premises as the nature of the case may require, and to your Honors may seem right: May it please your Honors to grant to your Complainants the State of Maryland's writ of Subpoena against said Andrew Sigafosse & Chas. Emory Sigafosse, commanding them and each of them to be and appear in your Honorable Court on some certain day to be therein named, to answer the premises and to abide by and perform such order or decree as may be passed thereon.

And as in duty bound will ever pray &c
Milton G. Warner
Sole for Complainants

Filed Aug 15, 1876