No. 4478 Equity

Your Orator charges that it will be to the interest and advantage and and benefit of the said Jeannette and Charles A Collins as well as to the benefit, interest and advantage of your Orator and all others having an interest in the said real estate to have the same sold under a decree of this Court and the proceeds arising therefrom applied in the first place to the payment of the said two notes so as aforesaid held by the said John H Williams and then, as to the surplus, divided between the said Edgar A. Collins, Jeannette Collins and Charles A. Collins as they are under the said deed from Mary A. Collins, entitled.

Your Orator further charges that it will be to the interest and advantage of the said infants, the said Jeannette Collins and the said Charles A Collins to have the said real estate sold and the proceeds divided between the parties entitled thereto after paying off the said incumbrance on said land.

Your Orator further charges that said Jeannette Collins and Charles A. Collins are residents of Frederick County Maryland and that the said John H. Williams is also a resident of said County and that said John S Johnson and William S. Thompson are non-residents of the State of Maryland and that they do not reside therein.

In consideration whereof and in as much as your Orator is remediless as aforesaid is without remedy in the premises except in a Court of Equity where matters of this nature are properly cognizable and relievable To the end that a Decree may be passed for sale of the said Real Estate described in said Exhibit A, except that portion thereof described in Exhibit C, and that the same may be sold free, clear and discharged of all incumbrances held by any and all the parties to this suit, and that the proceeds may be applied to the payment of the said notes held by the said John H. Williams and the remainder after paying the costs and expenses attending said sale may be divided among the parties entitled thereto under the said Exhibit A, according to the usage and practice of the Court of Chancery in such cases. May it please your Honors to grant unto your Orator an order of Publication addressed to the said John S. Johnson and William S Thompson giving them notice by publication inserted in some newspaper once a week for four successive weeks three months prior to the 16th day of August next, of the substance and object of this Bill of Complaint and the relief therein prayed for and warning the said John S Johnson and William S. Thompson to be and appear in this Court in person or by Solicitor on or before the 16th day of August next to answer this Bill, and stand to and abide by such decree as may be passed therein. And may it also please your Honors to grant unto your Orator a writ of subpoena addressed to the said Jeannette Collins, Charles A. Collins, Edgar A. Collins and John H. Williams requiring them to be and appear in this Court by some certain day to be therein named, to answer the premises and stand to and abide by and decree that may be passed therein.

And may it please your Honors to grant unto your Orator all such other and further relief in the premises as to your Honors shall seem meet and as the case may require.

And as in duty &c

April 11th, 1879

Filed April 12, 1879

Jas C McSherry
for Compts

Exhibit