

No. 4585 Equity

Rail Road and that since that time his mind has been greatly impaired, and at the present time, he is of unbound mind and utterly incapable of taking care of himself or his property - And is now an inmate of the Alms House of Frederick County

Your Complainant further states, that it appears from the record of Magistrate Judgments in the Office of the Clerk of the Circuit Court of Frederick County, that on the 20th day of September in the year 1879, a certain Thomas J. Page obtained a Judgment before Joel Hall Esq. Justice of the Peace of Frederick County against the said George W. Purdy for the sum of Ninety dollars debt with interest thereon from date till paid and One dollar and fifty cents, costs - that said Judgment was recorded in the Record of Magistrates on file in the Office of the Clerk for Frederick County, as will fully appear by reference to a certified Copy of said Judgment, marked Exhibit No. 2.

Your Complainant further states that after said Judgment was recorded the said Thomas J. Page caused a fieri facias to be issued thereon by Joel Hall Esq. the Magistrate directed to Marshall Hanson, Constable, who made a levy on the property aforesaid but failed to make sale of the interest of the said George W. Purdy thereon.

And your Complainant further states that the Real Estates mentioned in these proceedings, cannot be divided without loss or injury to the parties interested and that it will be to the interest and advantage of all interested that the real estate in the proceedings mentioned be sold, under a decree of your Honorable Court and the proceeds of sale divided amongst those interested.

To the end therefore that the Defendants hereinafter named may answer the matters and things hereinbefore stated as if they were herein again repeated and they were thereunto specially interrogated and that the Real estate in these proceedings mentioned may be sold under a decree of your Honorable Court and that the proceeds of sale may be distributed under the Order of your Honorable Court amongst the parties thereto entitled, and that your Complainant may have such other and further relief as the nature and Equity of his Case may require

May it please your Honor to grant unto your Complainant the writ of Subpoena against the said George W. Purdy and Thomas J. Page of Frederick County State of Maryland Commanding them to 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 &c

Wm J. Ross  
Charles W. Ross  
Sols for Complainant

Filed April 21, 1880

Saml Talbott et al }  
To } Copy of Deed  
Rich'd & Geo Wash Purdy }

Exhibit 1

This Deed, made this First day of July in the year of Our Lord One thousand eight hundred and fifty seven, by Samuel Talbott & Catharine Talbott his wife, and Joshua Wood and Eliza Wood, his wife and Elias Wood Insolvent trustee of said Joshua Wood, all of Frederick County in the State of Maryland, Witnesses, that in consideration of the sum of Ninety Dollars the said Samuel Talbott and Catharine Talbott his wife, and the said Joshua Wood and Eliza Wood his wife, and the said Elias Wood, Trustee as aforesaid, do grant unto Washington Purdy and Richard Purdy of the County and State aforesaid, all that Tract or parcel of Land, situate in Frederick County aforesaid (being part of a Tract of Land, called "Hobbs Purchase," included