

No 11409 Equity

John W Hayes & wife  
et al

(vs)  
Hiram A. Wolf & wife  
et al

To the Honorable the Judges of the Circuit  
Court for Frederick County as a Court of Equity  
The Bill of Complaint of John W. Hayes and  
Celia Ann Catharine Hayes his wife, Bradley

Bill of Complaint

Wolf and Hester E Wolf of Frederick County in the State of Maryland, respect-  
fully represents, that in or about the year Eighteen hundred and sixty a cer-  
tain Daniel Wolf Jr. departed this life intestate leaving surviving him a widow  
named Catharine Wolf, who is an adult, residing in Frederick County and the  
following heirs-at-law, namely a daughter Celia Ann Catharine, now the wife  
of John W. Hayes both of whom are adults living in Frederick County and Com-  
plainants in this cause, a daughter Moranda, now the wife of James Gordon  
both of whom are adults, non-residents of the State of Maryland and reside in  
the State of Ohio, a son Bradley Wolf who is an adult, unmarried, and lives in  
Frederick County, and is a complainant in this cause, a daughter Hester E.  
Wolf who is an adult, unmarried, and lives in Frederick County, and is a  
Complainant in this cause, a daughter Adeline V Wolf who is an infant  
under the age of twenty-one year, unmarried and lives in Frederick County, a  
son Hiram A. Wolf who is married, and the name of whose wife is Mary Wolf  
both of whom are adults, and live in Frederick County, a daughter Susan Ann  
Elizabeth now the wife of James O. Eastoday both of whom are adults, non-res-  
idents of the State of Maryland, and live in the State of Kansas, a son George  
W. Wolf who is married, and the name of whose wife is Sophia Wolf both of whom  
are adults, non-residents of the State of Maryland, and live in the State of Ten-  
nessee, a son David S. Wolf who died in or about the month of December in the year  
Eighteen hundred and seventy-seven leaving a widow Agnes Wolf, who is an adult  
surviving him, and two children Albert Wolf, and Emma Jane Wolf both of whom  
are infants under the age of twenty-one year, and widow, and infant children being  
non-residents of the State of Maryland, and residing in the State of Arkansas, and  
lastly, a son Richard H. Wolf who died intestate during the year Eighteen hundred and  
seventy-seven leaving surviving a widow Elizabeth Wolf, who is an adult, and is supposed  
to be living in Baltimore, Md, and a son Charles Wolf who is an infant living in Frederick  
County.

Your Complainants further state that said David Wolf Jr. died seized and pos-  
sessed of valuable real estate situated in Frederick County, described in a deed from  
George Hamer to him, a certified copy whereof is herewith filed, as part of this Bill, mark-  
ed Exhibit No 1 excepting therefrom such parts thereof as David Wolf Jr. sold during  
his life time, and are described in deeds, certified copies whereof are herewith filed as parts  
of this Bill, marked respectively Exhibits Nos 2 and 3.

Your Complainants further state that said David Wolf Jr. died seized and pos-  
sessed and possessed also of certain timber land, described in a deed from Peter Young  
and others to him, which deed has not yet been recorded but a certified copy whereof will  
hereafter be filed, as part of this Bill, and marked Exhibit No 4.

Your Complainants further state that said Real Estate is not susceptible of divis-  
ion among the parties entitled thereto without loss and injury to said parties and that  
it will be to the advantage and benefit of all the parties interested in said real estate  
infant as well as adult that said real estate be sold, and the proceeds thereof divided

Exhibit  
No 1