

No. 4608 Equity

Yungling his wife, Zadoc A. Yungling, and Margaret A. E. Yungling his wife, and William J. J. Yungling and Eva Yungling his wife, all of Frederick County, State of Maryland, respectfully show unto your Honors that a certain William G. Yungling, late of Frederick County, State of Maryland dec'd, was, in his lifetime, seized, and possessed, of a large and valuable Real Estate, situated in Frederick County, State of Maryland, and composed of various pieces, tracts, and parts of tracts of Land, called "Garden", "part of a tract, called New Bremen", "part of a tract, called Black Ace", and part of a tract, called "Hope", and by any other name or names by which the same may be called, containing in the aggregate in and about six hundred and thirty five Acres of Land, more or less, and fully described in the following Deeds - J. E. H. Simmons to William G. Yungling, two Deeds from Meredith Lewis to William G. Yungling, George Kephart & wife to William G. Yungling, Elias Spalding & wife to William G. Yungling, Samuel C. Boyer & wife, to William G. Yungling, and John W. Baughman, to William G. Yungling, certified copies of said deeds, being herewith filed and Exhibits marked Exhibits Nos 1, 2, 3, 4, 5, 6 & 7. Your Complainants pray together with all other Exhibits hereinafter produced, may be taken and considered as part of this their Bill of Complaint, the same as if herein inserted in words and figures.

Bill of Complaint

Your Complainants further state that that the said William G. Yungling died on the seventeenth day of May in the year Eighteen hundred and eighty intestate, and leaving the following children to whom the real estate mentioned in these proceedings descended, as his heirs, at Law, the said William G. Yungling, at the time of his death being a widower:

- 1st. John H. Yungling, a son, who married Jennie Mulligan.
- 2 Edmund S. Yungling, a son, who married Sarah Roberts.
- 3 Eliza Jane, a daughter, who married Ruben B. Pickett, and who died since the death of her said father, on June 1st, 1880 intestate, leaving her husband Ruben B. Pickett, and the following children her surviving and to whom her interest descended, as her heirs, at Law, subject to the life estate of the said Ruben B. Pickett therein
 - 1 Benjamin Franklin Pickett,
 - 2 Edward J. Pickett,
 - 3 Eva C. Pickett,
 - 4 Lily Jane Pickett,

All of whom are infants under the age of twenty one years, and reside in Frederick County

- 4th. Zadoc A. Yungling a son, who married Margaret A. E. Geisler
- 5th. Sarah A. a daughter, now the wife of Daniel J. Gout.
- 6th. William J. J. Yungling, a son, married to Eva King.

All of which said children except as above stated are all adults and reside in Frederick County, State of Maryland.

Your Complainants further state that the Real estate in in said proceedings is not susceptible of a just and equitable partition cannot be divided among the parties interested without loss and injury and that it would be to the interest and advantage of all parties

Exhibits
Nos.