No. 4658 Equity

portion of which tract has been sold by the said Abraham Lowe Sr. in his life time, and there is only now remaining that described in the plats filed as Exhibits No 4 & 5. Another tract of five acres more or less, adjoining the above named tract fully described in the Plat filed as Exhibit No 6

Another tract of four acres more or less, near the above mentioned home place and fully described in the plat filed as Exhibit No. 7. These Complainants further represent that the said Abraham Lowe Sr. at the time above mentioned departed this life intestate seized and possessed of a tract of Land lying, and being in Washington County, in the State of Maryland containing twelve acres, two roods and twelve perches of Land more or less, the original deed conveying the same to the said Abraham Lowe Sr. is recorded among the Land Records of Washington County as herewith filed as Exhibit No. 8

These Complainants further represent and charge that the said Abraham Lowe Sr. left surviving him a Widow named Susan Lowe aged Seventy years and the following named Sons and daughters, as his heirs at Law, all of whom are yet living, to wit:

1st Mahala Lipps married to William Lipps
2d Daniel Lowe unmarried
3d Mary Ann Hurley married to John E. Hurley
4th Thomas B. Lowe married to Annamelia
5th Hiram Lowe married to Selina
6th Michael Lowe married to Catharine R.
7th John A. Lowe married Martha
8th Jacob Lowe unmarried
9th Abraham Lowe Jr. married to Julia.

These Complainants further represent and charge that the said Mary Ann Hurley and John E Hurly her husband, Daniel Lowe, Hiram Lowe, and Selina his wife, your Complainant Michael Lowe and Catharine R. Lowe his wife, John A. Lowe and Martha Lowe and the widow Susan Lowe reside in Frederick County, Maryland; that the said Thomas B. Lowe and Annamelia Lowe his wife and Abraham Lowe Jr. and Julia Lowe his wife reside in Washington County Maryland; that your Complainant Mahala Lipps and her husband William Lipps reside in the State of Indiana, and Jacob Lowe resides in Lyon County in the State of Kansas, and that all said parties are adults, over twenty-one years of age

These Complainants further represent and charge that all the lands above mentioned, and of which Abraham Lowe Sr. died seized and possessed, at his said death descended to and vested in, as tenants in common, the above mentioned Sons and daughters of the said Abraham Lowe Sr, and that the said Mahala Lipps, Daniel Lowe, Mary Ann Hurly, Thomas B. Lowe, Hiram Lowe, Michael Lowe, John A. Lowe, Jacob Lowe and Abraham Lowe Jr. are seized and possessed of the same as tenants in common, that said lands cannot be divided amongst said parties without great loss and injury and that it would be to the interest and advantage of all said parties to have all of said Lands, both in Frederick and Washington County, sold under a decree of this Honorable Court, and the proceeds of said sale be divided amongst those entitled thereto according to their interest; That the said widow Susan Lowe has a dower interest in said Real Estate.

To the end therefore that the defendant hereinafter named may answer the matters and things hereinbefore stated and that the real estate mentioned in this Bill of Complaint be sold under a decree of your Honorable Court, and the proceeds of said sale may be distributed under the Order and direction of this Court among those entitled thereto, and that your Complainant may have such further and other relief as the nature and equity of their case may require.

May it please your Honors to grant unto your Complainants the writ of Subpoena against