

No. 4753 Equity

Fleet Staley & Mary Jane Staley
his wife, Granville S. Stull & Alphy
E. Stull, his wife

vs
Mary M. Zimmerman
John Luther Zimmerman
Manuel B. Pearl & wife et. al.

To the Honorable the Judges of the Circuit Court for Frederick
County, sitting as a Court of Equity

The Bill and Complaint of Fleet Staley, and Mary Jane Staley,
his wife, Granville S. Stull, and Alphy E. Stull, his wife, of Frederick County, in
the State of Maryland, respectfully represents unto your Honors that in the month of May, in
the year Eighteen hundred and eighty one, a certain John A. J. Zimmerman, of Fred-
erick County, in the State of Maryland, departed this life seized and possessed of differ-
ent tracts of Land, situated, lying, and being in Frederick County aforesaid; that the said
John A. J. Zimmerman died testate, leaving a last will and testament, duly executed and
probated, according to law, a certified copy of which last will and testament, as
filed and recorded in the office of the Register of Wills of Frederick County, and admitted to
probate by the Orphans Court of Frederick County, is herewith filed as Exhibit No. 1 to this
Bill of Complaint, which Exhibit, with all other Exhibits by these Complainants
herewith filed, they pray may be taken and considered as a part hereof, as fully as
if herein inserted in words and figures.

These Complainants further represent that by one of the provisions of said last
will and testament, the said John A. J. Zimmerman bequeathed and devised to your
Complainants Mary Jane Staley and Alphy E. Stull, and their six sisters, Cora S.
Lama A. Emma S. Martha A. Jessie M. and Lena Kate Zimmermans, share and share alike,
among other things his home farm on which he then lived, containing as devised fifty two
acres of land, more or less, and all the rest and residue of his real estate, not otherwise devised
in said last will and testament, all of which, will appear by reference to said Exhibit No. 1 to this
Bill of Complaint.

These complainants further represent and charge that said home farm of fifty two acres
and mountain land, which is all the real estate left by the said John A. J. Zimmer-
man, which by his said last Will and testament is not otherwise disposed of, by virtue
of the provisions in said last will and testament, has vested in these Complainants
Mary Jane Staley and Alphy E. Stull and their six sisters above mentioned, share
and share alike, as tenants in common, that said home farm of fifty two acres
more or less is composed of adjoining tracts of land, as follows: That tract of land descri-
bed in a deed from Valentine A. Albough and Rebecca his wife, to the said John A.
J. Zimmerman, a certified copy of which deed, as recorded, among the Land Records of
Frederick County, is herewith filed as Exhibit No 2 less two acres sold and conveyed
to Manuel Gedricks, as appears from certified copies of the deeds of Conveyance
to Manuel Gedricks and from him back to the said John A. J. Zimmerman
as recorded among the Land Records of Frederick County herewith filed as Exhib-
its 3 & 4, leaving in the Albough tract Twenty eight acres and one rood of land
more or less. These two tracts of land described in a deed from Jacob E. Zimmer-
man and wife and wife, to the said John A. J. Zimmerman, a certified copy of
which deed as recorded among the land records of Frederick County is herewith filed

Bill of
Complaint