

No 4864 Equity

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

The Bill of Complaint of David A. Baker of Frederick County Maryland respectfully represents unto your Honors that on the twenty first day of January in the year Eighteen hundred and Eighty three, a certain Mary A. Saylor of said County departed this life intestate seized and possessed of certain real estate lying and being in Frederick County aforesaid in the town of Hoodsboro, it being the same property conveyed by George Saylor to the said Mary A. Saylor by deed, a duly certified copy of which as recorded among the Land Records of Frederick County and herewith filed respectively as Exhibit No 1. which Exhibit with all others herewith filed by this Complainant, it is prayed may be taken and considered as a part hereof as fully as if inserted in words and figures.

This Complainant represents and charges that the said Mary A. Saylor left surviving her no children, but as her heirs at law a brother John A. Baker who is married and whose wife's name is Margaret Baker, George B. Baker, your Complainant David A. Baker, William C. Baker, Ellen A. Ginder who is married to John H. Ginder, Fanny M. Fuss who is married to Emanuel Fuss & Emma J. Holbruner who is married to Charles H. Holbruner who are the children and heirs at law of George B. Baker a deceased brother of the said Mary A. Saylor; Ella Baker, a daughter and heir at law of Dr. William H. Baker a deceased brother of the said Mary A. Saylor; Brook Yantis who is married and whose wife is Ann Yantis, William Yantis who is married and whose wife's name is Maggie Yantis; Elizabeth Rahter married to Adolphus Rahter and Joseph Shank, the children and heirs at law of Bahinda Shank, a deceased sister of the said Mary A. Saylor; Fairfax Baker who is married and whose wife's name is unknown, This Complainant Obo Baker, John B. Baker, Lu Baker, Carrie Baker, Minnie Baker, Edna Baker and Effie Baker children and heirs at law of David P. Baker, a deceased brother of the said Mary A. Saylor and Jane R. Snyder married to John A. Snyder the child & heir at law of Louisa Shank a deceased sister of the said Mary A. Saylor to whom said real estate descended and vested in as tenants in common, on the death of the said Mary A. Saylor because of their being her heirs at law, that the said George B. Baker, Fairfax Baker and his wife whose name is unknown, H. Baker, and Brook Yantis and Ann his wife reside in the State of Ohio and are non residents of the State of Maryland, that William Yantis and his wife, Maggie Yantis, Elizabeth Rahter and her husband Adolphus Rahter reside in the State of Pennsylvania and are non residents of the State of Maryland, that all the remainder of said heirs at law reside in Frederick County Maryland with the exception of Fanny M. Fuss and her husband Emanuel Fuss and Jane R. Snyder & her husband John A. Snyder who reside in Carroll County, Maryland and all are adults with the exception of William C. Baker, John B. Baker, Edna Baker, Effie Baker, Carrie Baker and Joseph Shank, who are infants under twenty one years of age.

This Complainant further represents and charges that said real estate is not susceptible of division among those entitled thereto and above named without great loss and damage and that it would be to their interest and especially the interest of the above named infants to have the same sold under the order or decree of your Honorable Court and the proceeds distributed among the parties entitled thereto according to their respective interest.

To the end therefore that the said John A. Baker and Margaret Baker his wife, George B. Baker, William C. Baker, Ellen A. Ginder and John H. Ginder her husband, Fanny M. Fuss and Emanuel Fuss her husband, Emma J. Holbruner and Charles H. Holbruner her husband, Ella Baker, Brook Yantis and Ann Yantis his wife, William Yantis and Maggie Yantis his wife, Elizabeth Rahter and Adolphus Rahter her husband Joseph Shank, Fairfax Baker and Baker his wife whose Christian name is unknown, Obo Baker, John B. Baker