

No 4961 Equity

Some suitable person appointed as Trustee to Convey the said real estate to the said Frederick Hankey upon his paying in full the said purchase money therefor, from and clear of all the rights of the parties to this bill.

And your Orators pray for the following relief,

- 1st That the said sale to the said Frederick Hankey may be ratified and confirmed and that a Trustee may be appointed by your Honorable Court to Convey said real estate to said Frederick Hankey, upon his paying in full the purchase money therefor.
- 2nd That in Case your Honors should refuse to ratify said sale and grant the relief heretofore prayed, that your Honors would appoint a Trustee to sell said real estate for partition among said parties in interest
- 3rd That your Orators shall have such other and further relief to which they may be entitled
- 4th That the State of Maryland's writ of Subpoena be issued to said Frederick Hankey commanding him to be and appear in your Honorable Court on some certain day to be therein named to answer the premises and show Cause if any he have why a decree should not pass as prayed for the ratification of said sale to him.
- 5th That a Commission be issued to some suitable persons residing near said George Thomas Pusey and Johnson Jackson Pusey infants of the City and State of New York authorizing them to take the answer of said infants to this Bill of Complaint, or that your Honors direct some suitable service to be made upon said infants and their answer to this bill of Complaint be taken by a guardian ad litem to be appointed for that purpose
- 6th That an order of publication be granted against said Emma L Pusey, giving her notice of the object and substance of this bill and warning her to be and appear in your Honorable Court on some certain day to be therein named to answer the premises and abide by and perform such order or decree as to your Honors shall seem right
- 7th That your Orators may have all such other relief as the nature of the case may require and to your Honors shall seem right. And they will ever pray &c.

Milton F. Jones
Sol for Plaintiffs

Maria Pusey
William J. Martin & others
vs

Emma L. Pusey & others

No 4961 Equity

In the Circuit Court for Frederick County

Ordered by the Court this 15th day of February A.D. 1884, that Herbert A. Shipman and David D. Acker Jr Esquires of the City and State of New York, who reside near George Thomas Pusey and Johnson Jackson Pusey the infant defendants mentioned, be and they are hereby appointed to serve a copy of the foregoing Bill of Complaint on each of the said infants and leave a copy thereof with the mother of said infants or such person as in whose care and custody said infants may be, and that David D. Acker Jr be & he is hereby appointed Guardian ad litem for said infants. and that after making said service that he as guardian ad litem prepare and transmit to this Court an answer for said infants to the foregoing bill of Complaint, and state such defence for said infants as in his judgment their interests require

John A. Lynch
Judge of the Cir. Court

Filed February 15. 1884.

At the request of Thomas Pusey the following Deed is recorded April 9th 1887.

1887 April 9th Rec Stamp duty

W. D. Tyler. Clk.

Exhibit No. 1.

This Indenture made this 12th day of March in the year one thousand eight hundred and fifty one, between Elizabeth Baumgardner of Frederick County and State of Maryland