

No. 5125 Equity

Clara F. McDonnell and Mary C. Wiles
infants by Jacob V. McDonnell
prochein ami, Jacob V. McDonnell and
Clara V. McDonnell his wife. Plaintiffs

No. — Equity
In the
Circuit Court
for
Frederick County,
sitting
as a Court of Equity.

Clara F. McDonnell, Mary C. Wiles
Mary A. McDonnell, Elizabeth J. Jackson
Thomas H. Jackson her husband, Defendants

To the Honorable the Judges of said Court:

Your Orators and Oratrices complaining show—

Bill in
Chancery
for
Sale of
Real Estate

1. That Jacob McDonnell late of Frederick County aforesaid, departed this life in the Month of October last intestate seized and possessed of personal property and of considerable real estate situated lying and being in Frederick County aforesaid.
2. That said real estate consists of several distinct parcels and is fully described in the deeds herewith filed marked Exhibits A. B. C. D. E. respectively and which are prayed to be taken and considered as a part of this Bill, as fully as if herein at large in words and figures set forth.
3. That said Jacob McDonnell left surviving him a widow, Mary A. McDonnell and the following children and grand-children to wit: (1) Elizabeth A. Jackson, a daughter married to Thomas H. Jackson. (2) Jacob V. McDonnell, a son, married to Clara V. McDonnell, (3) Clara F. McDonnell, a daughter (4) Mary C. Wiles, a grand daughter, being the daughter of a deceased daughter of said Jacob McDonnell, who died in the lifetime of said Jacob McDonnell.
4. That said real estate of which said Jacob McDonnell so died seized and possessed descended to and vested in the said widow, the said children and the said grand child of said Jacob McDonnell.
5. That said widow, said children and said grand child, all reside in Frederick County aforesaid.
6. That said Clara F. McDonnell and said Mary C. Wiles are infants under the age of twenty one years.
7. That said Clara F. McDonnell and said Mary C. Wiles so being such infants under twenty one years of age are by Jacob V. McDonnell whose written authority for the use of his name as next friend is filed with the Bill of Complaint.
8. That said real estate is not capable of being divided and partitioned amongst and between the said parties entitled thereto, and that it will be to the interest and advantage of all the said parties both infants and adults to have said real estate sold and the proceeds divided and distributed amongst said parties in the proportions to which they may respectfully be entitled.
9. That said widow is willing that the said real estate shall be sold clear of her dower right.
10. Your Orator and Oratrices pray for the following relief, —
1. That a decree may be passed for the sale of the said real estate to the end that proceeds may be divided between the said parties entitled thereto in the several proportions to which they may

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