

No. 5312 Equity.

David Staub, and Catharine V. Staub, his wife

No. --- Equity -

Abraham J. Groshon, and his wife, Thomas H. Groshon, and Ella Groshon, his wife, John L. Groshon and Susan Groshon, his wife, Samuel Hahn, and Kitty Ann E. Hahn his wife, Robert Eyles, and Pessy Matilda Eyles, his wife

In the Circuit Court for Frederick County,

sitting as a Court of Equity -

Bill of Complaint.

To the Honorable, the Judges, of the Circuit Court for Frederick County, sitting as a Court of Equity. The Bill, of complaint, of David Staub and Catharine V. Staub, his wife, of Frederick County in the State of Maryland, respectfully represents unto Your Honors.

1st That in the Year Eighteen Hundred and eighty-five, One Ann Matilda Groshon, did seized and possessed, of Real Estate lying and being in Frederick County Maryland, which is fully described in a deed for the same, a certified copy of which as Recorded, among the Land Records of Frederick County is herewith filed it is prayed may be considered as a part hereof - And that she also died seized, of another Tract, containing Eleven Acres more or less adjoining the above, which was conveyed to John Groshon in Trust for her benefit, and then to her heirs, which trust she and her husband Absalom Groshon enjoyed, and occupied during their lives treated as their own absolutely and a certified copy of the deed conveying the same is herewith filed as Exhibit No. 2.

2nd That the said Ann Matilda and Absalom Groshon both died intestate, and left surviving them as their heirs at law, the following named children, viz - the plaintiff Catharine V. Staub, a daughter whose husband's name is David Staub, A son Absalom J. Groshon, whose wife's name is Mary Groshon, Thomas H. Groshon, a son, whose wife's name is Ella Groshon, a son John L. Groshon whose wife's name is Samuel Hahn, Pessy Matilda Eyles, a daughter, whose husband's name is Robert Eyles, all, of whose are adults over Twenty-one Years of age, and all reside in Frederick County, Maryland, with the exception of Absalom Groshon and his wife who reside in Carroll County, Maryland.

3rd That the Real Estate described in Exhibits No 1 & 2 on the death of the said Ann Matilda Groshon descended to, and vested in the above named children and heirs, at Law as Tenants in Common.

4th That said Real Estate abovementioned is not susceptible of division among the above mentioned children, and heirs, at law without great Loss and Damage, in fact it is not capable of division, at all, among so many heirs, at Law, and they being unable to agree among themselves with reference to a Sale thereof these Plaintiffs are entitled to have the same sold under a decree of Your Honorable Court, and the proceeds thereof divided among the respective parties according to their respective Interests

5th These plaintiffs further represent, and charge that it would be to the interest and advantage of all of said parties, to have the same sold, under the decree of Your Honorable Court, and the proceeds divided among them.

To the end, therefore that said Real Estate described in Exhibit No 1.

Exhibit No. 1.