No. 5482 Equity.

The Bill of Complaint of Samuel Keealing and Mary Keealing his wife, of Frederick County, Maryland, respectfully represents unto your Honor,

1st. That on the 15th day of September 1888, Samuel Keealing Sr. of Frederick County, Maryland, departed this life intestate, seized and possessed of certain real estate consisting of a farm, containing about one hundred and twenty acres of land, and a tract of Mountain land, containing about forty acres of land, which is situated in Frederick County, Maryland, all of which is fully described in two deeds conveying the same to the said Samuel Keealing, certified copies of which deeds as recorded among the Land Records of Frederick County are herewith filed marked respectively Exhibits Nos 1. & 2. and that described as Exhibit No. 4 which deed & Exhibits, with all other Exhibits filed herewith, these Plaintiffs pray may be considered as a part hereof, as fully as if herein inserted in words and figures.

2nd. That the said Samuel Keealing left surviving him a widow named Christina Keealing, aged Eighty years and the following children and grand children as his heirs at law:

1. a son, Peter Keealing, whose wife's name is Elizabeth Keealing.
2. a son, David L. Keealing, whose wife's name is Alice Keealing.
3. the Plaintiff, a son, Samuel Keealing whose wife's name is Mary Keealing.
4. a daughter, Susan Cline, whose husband's name is Lawson Cline
5. a daughter Ella Greenwalt, whose husband's name is Walter Greenwalt.
6. the following Grand children by a daughter Mary Harp, who some years ago died intestate, leaving the following children & heirs at law, to wit: Elizabeth Poffenberger wife of John Poffenberger, George S. Harp, whose wife's name is Ann Harp, Amanda Brandenburg wife of Martin M. Brandenburg, Ellen Hart wife of Jacob Hart, Jenetta Hardman wife of Emanuel Hardman, Mollie Bateman wife of Clayton C. Bateman and Charles Harp.
7. the following Grand children by a daughter Martha Hays, who some years ago died intestate, leaving the following children & heirs at law, to wit: Viola Hays and Minnie Hays.
8. a daughter Amanda Cline wife of Elias Cline.

3rd. That all of the above named parties reside in Frederick County, Maryland, with the Exception of Peter Keealing and Elizabeth his wife, David L. Keealing and Alice his wife, who reside in Washington County, Maryland, Viola Hays who resides in Baltimore City, Maryland, Minnie Hays, who resides in the State of Kansas and does not reside in the State of Maryland, Mollie Bateman and Clayton C. Bateman her husband, who reside in the State of West Virginia, who are non residents of the State of Maryland, and all are adults with the Exception of Minnie Hays, who is an infant under twenty one years of age.

4th. That the real estate or parcels of land described in Exhibits 1 & 2 on the death of the said Samuel Keealing descended to and vested in the above named children and grand children as tenants in common, subject to the dower interest of the widow Mary Keealing, who is willing that said real estate be sold clear of her dower, she to receive in lieu thereof such an amount as under the laws and rules governing your Honorable Court would be right & just.

5th. That on the 22d day of March 1883, the said Samuel Keealing and wife, Executed unto Joshua E. Hoover a mortgage on the real estate described in Exhibit No 1. to secure the payment of the sum of nineteen hundred