No. 5721 Equity

William A. Hood and
Ella Hood, his wife

vs.

Rebecca Vansant, William E. Vansant
William Anderson and Virginia Anderson
his wife, Weedon Clary, and Sarah E. Clary
his wife, J. Wherly Vansant and Amelia Vansant
his wife, Lurie Vansant, Abel S. Vansant and
Claudia Vansant, his wife, Harry Helsby,
Joseph Helsby and James Helsby

No. 5721 Equity

In the Circuit Court for Frederick County,
sitting as a Court of Equity.

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

The Bill of Complaint of William A. Hood
and Ella Hood, his wife, of Frederick County, Maryland, respectfully represents unto
your Honors,

1st That on the 23rd day of August in the year Eighteen hundred and ninety one
Richard Vansant of Frederick County, Maryland, departed this life intestate, seized
and possessed of a large tract of land lying and being in Frederick County, Maryland,
containing something over two hundred and fifty acres of land, and fully described
in a deed from William Remsply and wife to the said Richard Vansant, a certified
copy of which deed is recorded among the Land Records of Frederick County, is
filed herewith as Exhibit No. 1. to this Bill, has that described in deeds executed by
the said Richard Vansant to various parties, certified copies of which deeds as
recorded among the Land Records of Frederick County are filed herewith as
Exhibits 2, 3, 4, 5, 6, 7, 8 all of which Exhibits, together with Exhibit No. 1. is
prayed may be taken and considered as a part hereof as fully as if inserted
therein in words and figures.

2nd That the said Richard Vansant left surviving him a widow named
Rebecca Vansant aged 64 years, who has a dower right in said real Estate and
the following named Children and Grand Children, as his heirs at law,

1. A Son named William E. Vansant,
2. A daughter Virginia A. Anderson, the wife of William Anderson,
3. A daughter Sarah E. Clary, the wife of Weedon Clary,
4. A son J. Wherly Vansant, whose wife's name is Amelia Vansant,
5. A daughter Ella Hood, the wife of William A. Hood, the plaintiff,
6. A daughter Lurie Vansant,
7. A son Abel S. Vansant, whose wife's name is Claudia Vansant,
8. And the following Children of a deceased daughter Georgianna Helsby to wit,

1 A Grandson named Harry Helsby
2 A Grandson named Joseph Helsby
3 A Grandson named James Helsby,

All of which heirs at law are adults over twenty one years of age excepting
the Grand Children Harry Helsby, Joseph Helsby and James Helsby, who are infants
under twenty one years of age,

3rd That the real Estate of which the said Richard Vansant died seized and
possessed, on his death descended to and vested in said heirs at law as tenants